

Privacy Statement- Data for Road Safety

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What is the Data For Road Safety initiative?

Data for Road Safety (DfRS) is a public-private partnership to improve road safety across the European Union. Watch the video to learn more about Data for Road Safety:



<https://www.dataforroadsafety.eu/>

Why was Data for Road Safety established?

Year 2019 was by far the safest on EU roads according to European Commission's preliminary figures in 2020. Although 2019 compared to 2010 indicates a 23% decrease in fatalities, an estimated 22,800 people died in a road crash.

The European target for the decade 2010-2020, to reduce the number of fatal road crash victims by half, stays far away. Furthermore, it is estimated that each road death causes injuries and life-changing consequences to five more people. In monetary terms, the yearly external costs estimation of road crashes in Europe is around 280 billion euros.

Aiming to reduce fatal accidents and injuries in the future on European roads, the EU has set a new reduction target for the decade 2021-2030: A 50% reduction target for road deaths and, for the first time, for serious injuries. These are target milestones on the way to reach zero road deaths in Europe by 2050 ('Vision Zero').

In order to achieve these targets for road safety, involvement of vehicle manufacturers, traffic information service providers, automotive suppliers and public authorities was required, resulting in the EU Commission Delegated Regulation 886/2013. The goal of the regulation is to regulate the sharing of data for road safety applications.

The regulation was initially interpreted differently by public and private parties. It was necessary to clarify the agreed extent and scope of the Delegated Regulation amongst the collaborating parties. To ensure this, the Safety Related Traffic Information (SRTI) Ecosystem Data for Road Safety was initiated and, with support of the European Commission, mutual agreement upon the Regulation was established.

Who established Data for Road Safety?

European Transport Ministers of participating Member States, the European Commission and automotive industry partners established Data for Road Safety on the 15th of February 2017 in Amsterdam, the Netherlands. The Task Force was initiated as a result of the first High Level Meeting on Connected and Automated Driving. France, Germany, Spain and the Netherlands were the initiating Member States.

The reason that this many parties are involved goes back to the fact that significantly improving road safety across Europe for all road users requires the involvement of car manufacturers, traffic information service providers, automotive suppliers and public authorities.

Which parties are currently part of Data for Road Safety?

Public authorities: ASFINAG Maut Service GmbH (Austria), Agentschap Wegen en Verkeer (Belgium), Transport and Communications Agency TRAFICOM (Finland), Federal Ministry of Transport and Digital Infrastructure (Germany), Ministry of the Economy (Luxembourg), Ministry of Infrastructure and Water Management (The Netherlands), Ministry of Home Affairs La Subdirección General de Gestión de la Movilidad DGT (Spain), Highways England (United Kingdom).

Traffic information service providers: HERE Europe B.V., INRIX Europe GmbH, Niradynamics AB, TomTom Traffic B.V.

Vehicle Manufacturers: BMW AG, Ford Motor Company, Mercedes-Benz Connectivity Services GmbH, Volvo Car Corporation (please note that some other vehicle manufacturers participated in the POC and may join later on).

What is the mission of the Data for Road Safety?

Data for Road Safety was structured around 3 core principles:

1. **Working together to make driving safer.** Safer driving is a shared vision amongst government and industry stakeholders and is a key foundation for this public-private partnership.
2. **Safety without compromise.** Vehicle data have the potential to save lives. By making safety data a priority and by sharing data across brands and across borders, its benefits can be maximized and lead to enhanced road safety.
3. **A fair and trusted partnership.** Data for Road Safety is a trusted partnership of government and industry stakeholders that enables fair competition.

How will Data for Road Safety achieve these goals?

To achieve these goals, Data for Road Safety has set up an ecosystem in which the participating parties exchange data being used to create SRTI messages. The raw data is originating from vehicle manufacturers (car sensor data) or other contributors, namely crowdsourced events by navigation modules or traffic information from governmental bodies. The data that is generated by these sources, can be used to inform road users, e.g. about road or weather conditions that may affect their safety. In order to warn drivers about potentially dangerous situations, Data for Road Safety enables parties to generate SRTI messages.

These messages are generated by combining, aggregating and analyzing raw (event-based) data-elements that are made available through the ecosystem.

What are Safety Related Traffic Information messages?

SRTI messages are messages that appear on, for example, the dashboard of the car warning the driver about a slippery road, reduced visibility, a wrong-way driver or other safety-related situations on the road. European Regulation 886/2013 indicates the eight types of SRTI messages, which are further outlined in the section below.

What kind of SRTI messages does the Data for Road Safety generate?

To improve road safety, Data for Road Safety generates data about eight types of safety-related situations on the road, so called SRTI messages:

1. Temporary slippery road.
2. Animal, people, obstacles, debris on the road.
3. Unprotected accident area.
4. Short-term road works.
5. Reduced visibility.
6. Wrong-way driver.
7. Unmanaged blockage of a road.
8. Exceptional weather conditions.

The SRTI message itself does not contain data that can be directly linked to an individual. For example: the end-user receives an SRTI message about a possibly dangerous event on the road, e.g., reduced visibility but will not receive additional information about which specific car, car brand or license plate is involved or which car has initially detected the event. Therefore, the SRTI message cannot be directly linked to an individual and does not represent personal data. What data does Data for Road Safety use and how is this collected?

The purpose of Data for Road Safety is to enhance data sharing between public and private parties (or between public parties) so that road users can be informed with the most reliable and timely road safety information available, thus improving road safety for road users.

The source of the data exchanged within the Data for Road Safety ecosystem mostly comes from connected vehicles on the road in the European Union, produced by manufacturers which are part of Data for Road Safety. Car manufacturers collect various data points from such cars, depending on the services activated or consented to by the customer, agreements in place with customers, provided customer consent, as well as other factual elements in accordance with applicable law, differing from one manufacturer to another. Since this data is personal, each car manufacturer must have in place specific notices explaining the processing of personal data. Customers can obtain more information by contacting their respective manufacturer. It is important to note that this initial collection of car data by the manufacturer is not part of the Data for Road Safety ecosystem, and that data is fed into this ecosystem only after being stripped from all personal identifiers, as detailed below.

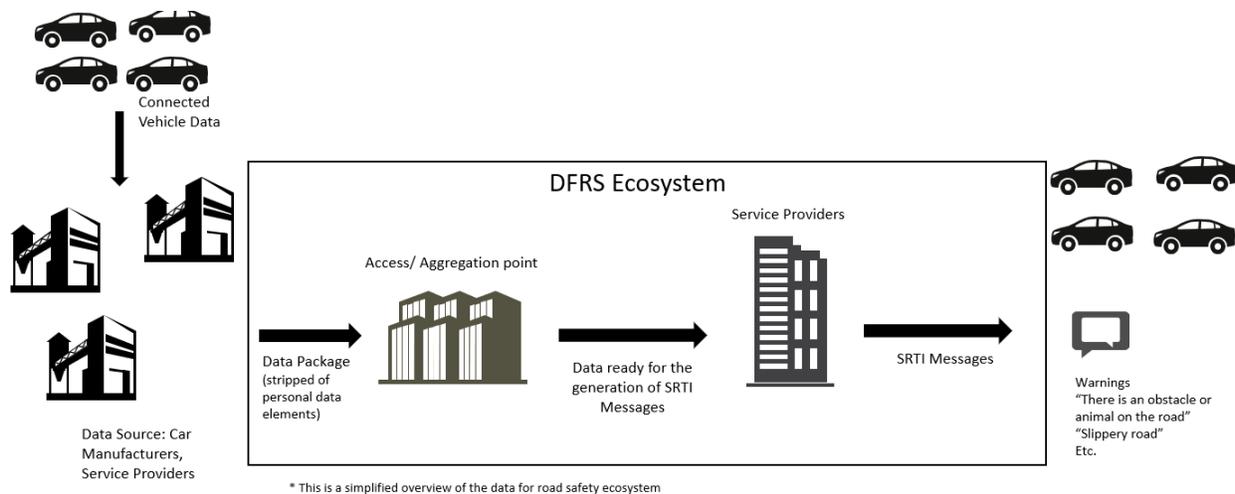
The participating vehicle manufacturers deliver to Data For Road Safety a very small fraction of the data collected from the vehicle, for reuse of such data to create SRTI messages. The data consists of six data points, which are only passed on in the case of an observation / event, not permanently:

- Event ID
- Event Type
- Longitude
- Latitude
- Heading/direction of travel
- Time stamp

The data points only contain the very bare minimum of what is required to generate the aforementioned SRTI messages, and they are not linked to another in any way. For example, it is not possible to know that the same car issued two of these collections. All potential direct links to an individual and any other personal data have been irreversibly stripped from the data package before it enters the Data for Road Safety ecosystem in order to protect the privacy of individual vehicle owners and users.

The aforementioned Event ID contains a unique randomized rotating number within the ecosystem to solely identify the specific event (e.g., the activation of the ABS). The Event ID is used to de-register the event after the situation was cleared (e.g., the ABS has been deactivated again). Next to that, the location where the event has happened is shared (longitude and latitude), including the vehicle’s direction to identify the lane in case of multiple lane roads. The final datapoint being shared is the time at which the event has occurred or has been identified to occur. SRTI data is only generated when a specific event is triggered, and only then a signal is being sent to the SRTI ecosystem. Any event generated by a vehicle looks like a completely new event with no relation possible between events originating from the same vehicle.

This data package is then sent by the car manufacturer to a National Access Point (NAP) or (private) aggregation point. The NAPs are being designated by Member States. The NAP regroups (and where necessary, aggregates) the data for reuse by service providers and road operators to generate and distribute SRTI messages. The dataflow within Data for Road Safety is illustrated in the picture below:



The purpose, goals and tasks of Data for Road Safety are based on European law, in particular on the Commission's Delegated Regulation 886/2013 supplementing Directive 2010/40/EU of the European Parliament and of the Council with regard to data and procedures for the provision, where possible, of road safety-related minimum universal traffic information free of charge to users.

Is personal data shared within the SRTI Ecosystem between different parties?

Data for Road Safety consists of vehicle manufacturers, traffic information service providers, automotive suppliers and public authorities. The parties use and share data to improve road safety by generating so SRTI messages. The contractual duty of all parties is to refrain from exchanging personally identifiable data within the ecosystem.

Could it be possible that the Data for Road Safety collects personal data of me?

As stated above, there is no personal data passed on to Data for Road Safety, and there is no personal data involved in the generation or distribution of SRTI messages. The manufacturers are taking care of stripping off all personal data elements, thereby reducing the shared data to the bare minimum, as described above.

Furthermore, there is no possibility to relate any data collected from the customer or the customer's vehicle with one another within the SRTI ecosystem. Hence, two events from one vehicle entering the ecosystem cannot be traced back to the same vehicle. They are seen as any two events entering the ecosystem, coming from any given vehicle.

What safeguards are in place to prevent the usage and collection of data which can be attributed to a specific data subject?

Data for Road Safety has conducted an extensive Data Protection Impact Assessment to assess the privacy risks of the ecosystem and has defined compensating measures to mitigate the identified risks. The measures and safeguards that have been taken are summarized below:

To begin with, there is no personal data or information on an identifiable natural person injected into the ecosystem.

To reduce possible privacy risks, parties of the ecosystem contractually agreed to take appropriate measures to ensure that the data they make available to the ecosystem do not contain personal data. This means that all individual parties are responsible to implement technical and organisational measures to ensure that no personal data is being shared within the ecosystem. This also includes measures to prevent the possible re-identification of the event once the data has been shared with the ecosystem.

Participating parties are contractually bound to remove the content they receive through the SRTI ecosystem without undue delay.

What laws, contracts & regulations apply to Data for Road Safety?

The lawful basis for generating SRTI messages within the SRTI ecosystem Data for Road Safety is defined in Delegated Regulation 886/2013.

The terms, conditions and obligations of all parties to the ecosystem are established in a 'Multi Party Agreement'.

What rights do I have in relation to this data?

As Data for Road Safety does not collect, store or share data that can be directly linked to an individual, it cannot answer to any data subject rights under the General Data Protection Regulation. For example, Data for Road Safety cannot provide individuals with a copy of the personal data the ecosystem holds about individuals, nor can it facilitate an individual's right to be forgotten because there is no data within the ecosystem that can be directly tied to an individual. Individual end-users are able to exercise their rights in relation to their vehicle, e.g. the vehicle's contact details can be found on the website and in any dedicated privacy notice of the vehicle's manufacturer. Manufacturers will however only provide information about their own processing of personal data. Such information does not include the data shared within the SRTI ecosystem.

Who can I contact if I have privacy-questions about Data for Road Safety?

If you have questions or concerns about Data for Road Safety or the way the ecosystem handles (personal) data, you are welcome to contact us via info@dataforroadsafety.eu. You may also contact your local data protection authority with questions and complaints.

The opinions and views expressed in this statement are those of the DFRS public-private partnership. They do not necessarily purport to reflect the opinions or views of the individual parties that are part of the partnership.