



FEDERATION INTERNATIONALE DE L'AUTOMOBILE  
REGION I - EUROPE, THE MIDDLE EAST AND AFRICA

## **C-ITS stakeholder Workshop**

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# Results of FIA Region I's Public Survey





95%

**want legislation to protect user data  
when it comes to connected vehicles**

# FIA Region I legal study Main findings



## DATA PROTECTION CAR DATA IS PERSONAL DATA

LEGAL ASSESSMENT BASED ON THE GDPR FROM 2018

### LEGISLATION DISTINGUISHES ONLY BETWEEN PERSONAL AND NON-PERSONAL DATA



Personal data = data that can be linked to a specific user



Personal data = privacy laws ensure the right to privacy, protection and consent over who accesses and processes to the data



Car data = data transmitted from a connected vehicle

### WHAT THIS MEANS FOR CAR DATA



Car data can be linked to the car owner so almost all car data is personal data



Privacy laws apply to car data



Car owners have a right to data privacy and to decide whether to share data or not

#### DID YOU KNOW?

Technical data can qualify as personal as well. The primary nature of data does not make any difference for data protection legislation.



## FREE CHOICE USERS WILL BE ABLE TO TRANSFER THEIR CAR DATA TO A THIRD PARTY

LEGAL ASSESSMENT BASED ON THE GDPR FROM 2018

### THE DATA PORTABILITY PRINCIPLE WAS EXPRESSLY CREATED TO ENCOURAGE COMPETITION



This ensures the free flow of personal data in the EU without hindrance from the data controller



Personal data can be transferred from one controller to another, if technically feasible



Data has to be provided in a common, machine-readable format

### WHAT THIS MEANS FOR CAR DATA



Consumers can decide who processes their car data, independent from vehicle manufacturers

#### DID YOU KNOW?

78%

of consumers want to choose who repairs their car\*

\*Based on 2015 FIA Region I consumer survey



## FAIR COMPETITION EXTENSIVE MONITORING OF VEHICLE DATA FOR LIABILITY IS NOT NECESSARY

LEGAL ASSESSMENT BASED ON PRODUCT  
SAFETY & LIABILITY LEGISLATION

### VEHICLE MANUFACTURER LIABILITY



Obligations related to liability cannot justify an exclusive right to access and process data

### WHAT THIS MEANS FOR CAR DATA



Liability obligations do not allow for vehicle manufacturers to deny third parties access to data



Consumer consent is necessary to process data, as product monitoring obligations are not sufficient to justify extensive data processing

#### DID YOU KNOW?

MORE THAN 70%

of European car users are concerned about the monitoring of their car data\*

\*Based on 2015 FIA Region I consumer survey



# Legislation on access to vehicle data is essential

## WHAT IS THE SAFEST, MOST SECURE AND **CONSUMER FRIENDLY** WAY TO SHARE CAR DATA?

The EU needs to develop specific legislation to ensure the safe and free flow of data from car makers to trusted third-party providers.  
This will enable:



### **FREE CHOICE**

Consumers can choose and change their services providers and products



### **FAIR COMPETITION**

Third-party providers can develop a variety of useful services for car users

Direct access to car data  
by third-party providers  
does not compromise liability,  
security or data protection



The end  
**Thank you for your attention**

