

Nordic WAY 2



Data privacy and GDPR in the NordicWay2 national pilots – **The Finnish pilot**

Michaela Sannholm, Project Manager,
Finnish Transportation and Communications
Agency Traficom



Co-financed by the Europe
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Background of the Finnish C-ITS-deployment pilot

- The C-ITS-deployment pilot continues the architecture developed in NordicWay with sharing of C-ITS-messages through a central cloud
- The aim of the pilot is to share information that **enhance traffic safety and fluency** and to **create a new way to share C-ITS-messages between traffic information suppliers** so that the end user gets more information of better quality
- Traficom has contracts with 3 suppliers
 - Each supplier sets up an interchange node
 - Each supplier is obliged to exchange their ecosystem's C-ITS messages with other suppliers via the interchange nodes

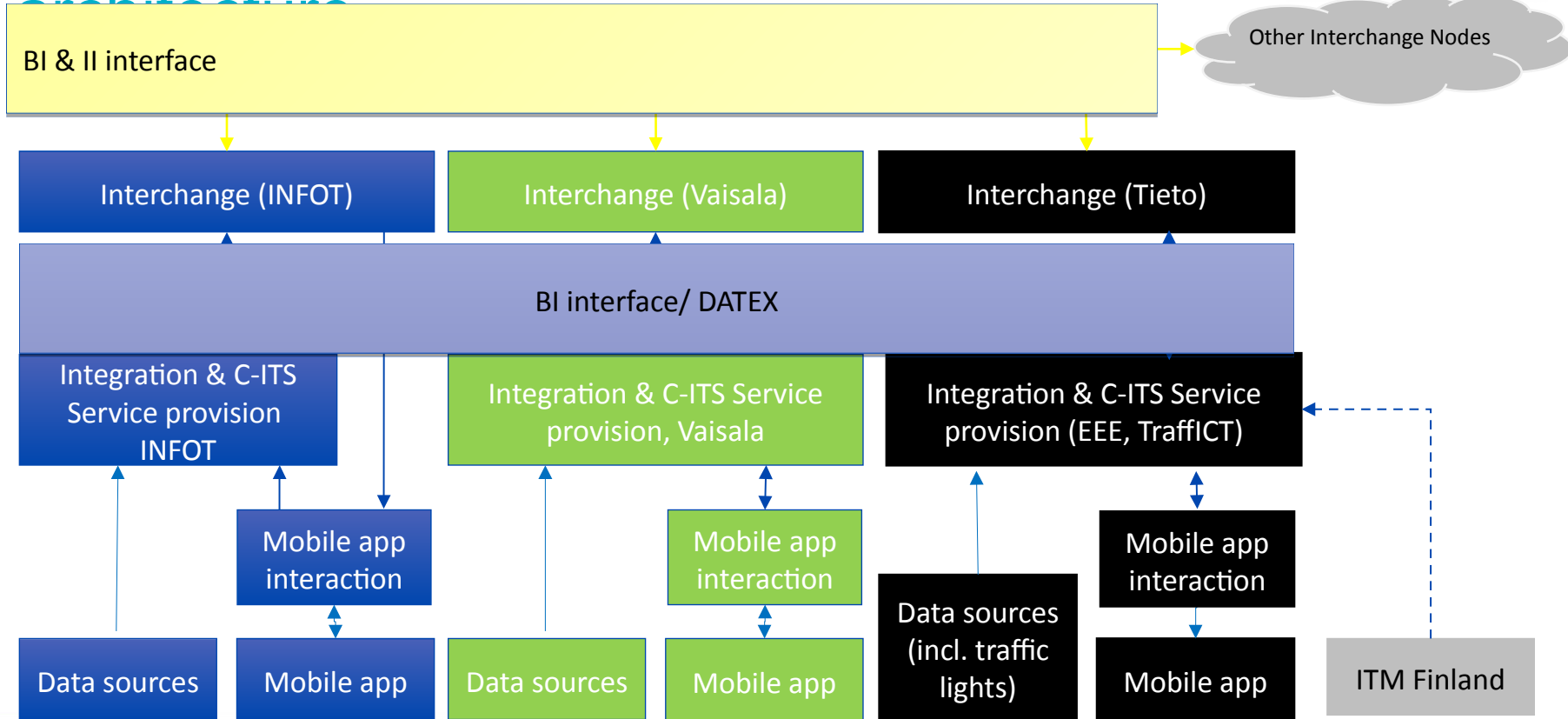


Finnish C-ITS-deployment pilot partners

- estimated amount of pilot users ~7000



The Finnish C-ITS-deployment pilot, architecture



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Finnish deployment pilot: Protocols

- Exchange between interchange servers:
 - NordicWay protocol,
 - Based on AMQP v1.0 publish-subscribe protocol
 - Migration to C-ROADS BI protocol
 - Federation protocol for automated discovery is being tested
 - Avoids to have to connect to each interchange server separately

- Payload:
 - DATEX II v3.0 used for publication of events
 - Migration to standard C-ITS messages in NordicWay3



Roles in the Finnish C-ITS-deployment pilot

- The Finnish Transport and Communication Agency Traficom is funding the pilot
- 3 suppliers, with 15 subcontractors (service providers) in total: different roles, many companies have several roles:
 - Data collectors
 - Integrators
 - Data analyzers
 - Visualizers
 - Interchange Server providers
- A large variety in how the suppliers and service providers are gathering the data
 - Mobile apps
 - Professional drivers and private persons
 - In car devices (dash board devices, in-vehicle sensors, machine vision)
 - Static devices (in-road sensors, traffic signals, VMS...)



Process to establish good data privacy in the pilot

- Traficom wants to have a good picture of **how the involved companies are handling their personal data** and wants to make sure that they are acting accordingly to the GDPR
- **The companies are filling out a form**, with information about the piloted C-ITS-services and how personal data is handled in the different services:
 - What kind of information/data is gathered for the C-ITS-service and what is the purpose of it
 - What kind of personal data is gathered by the company for this particular service
 - Lawfulness of processing the personal data
 - The rights of the data subject
 - Anonymization and pseudonymization of the collected personal data
 - Other factors considered in the processing of personal data



Lessons learned

- Public-private collaboration
 - The private companies are the controllers/processors and therefore obliged to follow the GDPR, but as public interest (and money) is involved in the development, it is also a public interest to solve these issues.
- Important to have right kind of expertise solving issues and raising the questions
 - Collaboration between technical – legal – user understanding – communication
- Collaboration on EU-level?



What next / open questions

- How to build new on old structures?
 - The pilot involves services that already have users (~7000) from before – important to secure that these users understand what they are involved in
 - New consent from the users?
- C-ITS feature
 - Messages can and will be distributed widely and they will be aggregated and analysed on the way – if the user wants to know where his/hers personal data is being used, it can be hard to track
 - When does personal data stop being personal data?
- Employees as data subjects
 - How can a consent be freely given when the controller is your employer?



Thank you!
Questions?

