

## Comments on Guidelines 1/2020 on processing personal data in the context of connected vehicles and mobility related applications

Comments from Swedish Transport Agency on Guidelines 1/2020 on processing personal data in the context of connected vehicles and mobility related applications.

### General comments

- The guidelines constitute a useful compilation of personal data related topics, in the context of connected vehicles and mobility related applications.
- Due to a continuous development and ongoing related works, the guidelines should be updated and fine-tuned, at least when the revision of the ePrivacy regulation is adopted.
- There are useful definitions, explanations, recommendations in the guidelines. The annex with use cases and the GDPR walk through gives valuable guidance on GDPR interpretation.
- A special attention should be given to clarify the use of legal basis for public authorities processing of personal data. How general could a regulation be formulated to be considered a valid legal basis?

### Specific comments

Section 1.3.1. "Out of scope of this document" is a bit unclear.

- Point 32 is very hard to understand and should be rephrased.
- Point 34: It is stated that C-ITS is out of scope, due the fact that the field is to some extent paid special attention by WP29, and that a future development related to automated vehicles is foreseen. However, the rest of the guidelines does give recommendations for ex. for vehicle design, (partitioning, security alarm, log, standardisation of in-vehicle user information.) Such recommendations are valid also to C-ITS. The section should thus be rephrased.