

Dear EDPB Sir or Madam,

I am Zhang Miao Frank, a Data Protection Advisor in DPO Office of Huawei Belgium.

There are some suggestions for the EDPB connected vehicles guidelines in my personal view:

1. **Paragraph 60.** Accordingly, the vehicle and equipment manufacturer, service provider and other data controller shall be particularly vigilant not to collect location data except if doing so is absolutely necessary for the purpose of processing

Suggestion: it should be more clear for the 'absolutely necessary for the purpose of processing', the controller should consider about the legitimate assessment for the purpose test & necessity test and balancing test.

2. **Paragraph 76.** If data must leave the vehicle, consideration should be given to anonymize them before being transmitted.

Suggestion: There's some app cases that the user wants to authenticate himself on the cloud side, it can't be anonymized of his account and password, otherwise the authentication of the user will be failed.

3. **Paragraph 94.** The vehicle manufacturer, service provider or other data controller can transmit personal data to a data processor selected to play a part in providing the service to the data subject, provided the data processor shall not use those data for its own purpose.

Suggestion: It's not clear for 3rd party how to use the data, just not use the data for its own purpose. It should be clearly follow up the service content which controller provide to the data subject. It should be clear to notice or get the consent of the data subject when transmit the personal data to the third party.

4. **Paragraph 126.** In principle, only the data controller and the data processor have access to the data.

Suggestion: it should only the data controller, data processor and data subject have access to the data.

Best Wishes

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