



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

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Opinion

The Swedish Government issues appropriation directions for the government agencies using regulation letters. According to Swedish regulation (2010:185) with instructions for Swedish Transport Administration, STA shall perform accidentology studies. Thus, the legal basis for personal information processed in those studies is GDPR Art 6.e public interest.

Section 3.3 Accidentology studies in the guidelines focuses only on voluntary accidentology studies, where consent is required for all processing of personal information. Swedish Transport Administration suggest that the guidelines are updated to better reflect participation in studies where public interest is the legal basis.

Internal consultation

Internal departments with responsibility for C-ITS, accidentology studies, information management have been consulted. Data Protection Officer Per Tuvall have been mainly responsible for analysing the guidelines and preparing the response. The response have been approved by Executive Director Legal Matters and Plan Review Charlotta Lindmark.

Lena Erixon
General Director