

Data Protection Notice

This data protection notice is issued by Transport Infrastructure Ireland with its main address at Parkgate Business Centre, Parkgate Street, Dublin 8, D08 DK10, Ireland (“TII”, “we”, “us”, “our”). As part of TII’s participation in the C-Roads Platform, TII is carrying out a pilot to test the effectiveness of a cooperative intelligent transport system across the Ten-T road network (which is the Trans-European motorway network which connects Cork, Limerick, Dublin and the border with Northern Ireland) and Dublin’s urban road network (the “C-ITS Pilot”).

TII is the controller of personal data collected and processed in connection with the C-ITS Pilot. Please be assured that the privacy and the security of personal data relating to participants is important to us. We will take appropriate steps to protect participants’ personal data and to comply with our obligations under data protection law.

About Us

TII was established following the statutory merger of the National Roads Authority and the Railway Procurement Agency under the Roads Act 2015. If you have any questions about the C-ITS Pilot’s use of your personal data or this notice, please contact our Data Protection Officer (the “DPO”):

A. O’Shaughnessy,
Transport Infrastructure Ireland,
Parkgate Business Centre,
Parkgate Street,
Dublin 8,
D08 DK10.

Tel: +353 1 646 3600

Email: dataprotection@tii.ie

Personal Data Processed by the Pilot

We may collect and process personal data relating to you in connection with your participation in the C-ITS Pilot. This personal data may include the following:

- Contact Details – Your name, address, email address, phone number and any other personal data that you may provide when registering as a participant of the C-ITS Pilot.
- Biographical data – Your age and gender.
- Device identifiers – Device identifiers such as the identifier of an on-board unit or a unique ID of a mobile device used in connection with your participation in the C-ITS Pilot.

- C-ITS messages – C-ITS messages transmitted between vehicles and transport infrastructure will be collected in connection with the evaluation of the C-ITS Pilot which may include location data. Location data includes data relating to the location of your vehicle, time of travel, speed and direction of travel.
- Surveys and feedback – Any personal data provided as part of surveys and feedback on the C-ITS platform which may include responses to ‘driver profile’ questions (e.g. age, gender and occupation).
- Rewards – Your email address and device identifier may be processed in order to provide you with access to rewards programmes and other benefits that you subscribe to.
- Miscellaneous – Any other personal data that you provide to TII or which is otherwise processed in connection with your participation in the C-ITS Pilot.

Purposes of Processing and Legal Basis

Your personal data may be processed in connection with the C-ITS Pilot including for the following purposes:

- Registration – Registering you as a participant of the C-ITS Pilot.
- Surveys and research – Carrying out surveys and research in connection with your experience of C-ITS and participation in the C-ITS Pilot.
- General Administration – We will process your personal data in order to operate the C-ITS Pilot and to respond to any queries you may have or other communications from you.
- Service Communications – When sending service communications or otherwise communicating with you about the service, we may process your personal data.
- Evaluation – We will process C-ITS messages and your personal data for the purposes of enabling us to evaluate and assess the effectiveness of C-ITS (e.g. testing capability of the technology) and to identify any improvements that could be made for longer-term deployment.
- Rewards – We may process personal data (such as your email and device identifier) in order to provide you with access to rewards programmes and other benefits that you subscribe to.

The legal bases on which we collect and process your personal data is as follows:

- Consent - your consent, which you can provide to us via TII’s consent form available on the Pilot Participant Data Platform. You can withdraw your consent at any time by selecting the ‘withdraw consent’ button on the Pilot Participant Data Platform. In addition, you can switch off your on-board unit or delete the application from your mobile device to prevent further processing of such data in connection with the C-ITS Pilot. Where you withdraw your consent, please note that this does not affect the lawfulness of the processing that took place before your consent was withdrawn, however, we will no longer process your personal data in connection with the C-ITS Pilot unless permitted by law. If you also request

that TII erase or anonymise your personal data, we will do this unless the continued processing and storage is permitted by law including where such processing is necessary:

- For compliance with a legal obligation which requires the processing by EU or Member State to which TII is subject to or for the performance of a task carried out in the public interest or in the exercise of official authority;
 - For historical research purposes or statistical purposes; or
 - For the establishment, exercise or defence of legal claims.
- Performance of a task in the public interest – Where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority. In this regard, TII has been conferred with the power, amongst others, to secure the provision of a safe and efficient network of national roads under the Roads Act, 1993 (as amended).
 - Performance of a contract – Where the processing is necessary for the performance of a contract to which you are subject or to take steps at your request prior to entering into a contract with you including, without limitation, the terms and conditions that apply to C-ITS.

Personal Data that the C-ITS Pilot Requires You to Provide

You are not under any statutory obligation to provide TII with your personal data. However, if you do not provide us with your personal data, you cannot participate or continue your participation in the C-ITS Pilot as the effective evaluation of the C-ITS Pilot is dependent on a review of the data.

Recipients of Data

TII may disclose your personal data to various recipients in connection with the above purposes, including:

- Consultants, Service Providers and other partners – Third parties who we engage to provide services to us or others who are involved in the provision of the C-ITS Pilot or in connection with the evaluation of the C-ITS Pilot. Where commercially practicable, such third parties will process pseudonymised or anonymised data.
- Regulatory Authorities and Government Bodies – Where required by law or requested, we may make your personal data available to regulatory authorities and government bodies.
- Consultation groups – Where we participate in a consultation group or other group considering or assessing C-ITS or similar technologies, we may provide your personal data to them, however, we will endeavour to anonymise such data prior to any such disclosure.
- Rewards programmes – Where you have signed up to participate in a rewards programme, we may provide that third party with any relevant personal data which is needed to enable you to access the rewards.

Transfers Abroad of Members Personal Data

In connection with the above, TII does not propose transferring your personal data outside the European Economic Area. In the event that this changes and TII transfers your personal data outside the European Economic Area (including to a jurisdiction which is not recognised by the European Commission as providing for an equivalent level of protection for personal data as is provided for in the European Union), TII will ensure that appropriate measures are in place to comply with our obligations under applicable law governing such transfers, which may include entering into a contract governing the transfer which contains the 'standard contractual clauses' approved for this purpose by the European Commission and carrying out a transfer impact assessment. Further details of any measures that TII takes are available from TII's Data Protection Officer.

Retention

TII will not hold your personal data for longer than is necessary. TII retains your personal data for as long as we need it for the purposes described in this notice, or to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise between you and us. In general, your personal data is retained for the duration of the C-ITS Pilot and for twelve (12) months thereafter and it will then be aggregated and anonymised.

Your Rights

You have the following rights, in certain circumstances, in relation to your personal data:

- *Right to access the data* - You have the right to request a copy of the personal data that TII holds about you, together with other information about its processing of that personal data.
- *Right to rectification* - You have the right to request that any inaccurate data that is held about you is corrected, or if TII has incomplete information you may request that it updates the information such that it is complete.
- *Right to erasure* - You have the right to request TII to delete personal data that it holds about you. This is sometimes referred to as the right to be forgotten.
- *Right to restriction of processing or to object to processing* - You have the right to request that TII no longer process your personal data for particular purposes, or to object to the processing of your personal data for particular purposes.
- *Right to data portability* – You have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.

You can make a request to exercise any of the above rights through the Pilot Participant Data Platform.

Updates to your Personal Data

Please note that if there are any changes to your personal details, you can update/amend these on the Pilot Participant Data Platform.

Complaints

You also have the right to lodge a complaint with the Data Protection Commission if you are not happy with the way TII has used your information or addressed your rights. Details of how to lodge a complaint can be found on the Data Protection Commission's website at www.dataprotection.ie.