

## **Annex 2. Privacy Notice**

### **What is the GTS Smart Mobility Hub App?**

The Smart Mobility Hub is a pilot project that allows Dublin City Council (DCC) staff to use a selection of e-cars, e-bikes and push bikes when they need to go off-site for work purposes. This service is free to DCC staff.

Good Travel Software (GTS) have developed the GTS Smart Mobility Hub app to allow staff to conveniently book the Mobility Hub vehicles.

In order to provide this service, **DCC (Data Controller)**, project partner **GTS (Data Processor)** and sub-processors, need to collect and process your personal data for booking and fleet maintenance purposes.

This privacy notice sets out how your data will be processed and your rights as a data subject.

Separate to this service delivery, anonymised (not personal) journey data will be shared with UCD Spatial Dynamics Lab for research purposes. This is to help evaluate and validate the Smart Mobility Pilot Project. The data shared with UCD will be historic GPS data collected from the Mobility Hub Vehicles. No personally identifiable information will be shared with UCD. To read more about the research project [click here](#).

### **Why do we have a Privacy Statement?**

This privacy statement intends to demonstrate Dublin City Council's firm commitment to privacy and to assure you that in all your dealings with us we will endeavour to ensure the security of the data you provide to us.

Any personal information that we process will be treated with the highest standards of security and confidentiality, strictly in accordance with the General Data Protection Regulations (GDPR) 2018 and the Data Protection Acts 2018.

### **How will the GTS Smart Mobility Hub process your data?**

#### **1. What personal data do we need?**

The below personal data fields are collected and subsequently processed when you sign up to the service:

- First name
- Last name
- Email address
- Password
- Work address
- Mobile phone number
- Driver's license image front and back

- Date of Birth
- Pay Number
- Gender
- Grade
- Section
- Department

The below data is processed automatically when an e-car or e-bike is being used:

- GPS location data

## 2. How will we process your personal data?

### Registration

- In order to use the Smart Mobility Hub vehicles you must register via the GTS Mobility Hub App.
- The personal data that you share via the app registration process will be used to create a user profile. This will enable you to make bookings and use the service.
- In the case of booking cars, your personal data will also be reviewed to ensure that you can legally use the service.

### Communication

- Your personal data will be used to enable DCC, GTS, or customer support sub-processors, contact you, if necessary, in relation to service use.
- Your personal data will not be used for marketing purposes.

### Fleet Maintenance and Customer Support

- GPS location data will be collected automatically when the e-cars and e-bikes are in use. No GPS location data is collected from push-bikes.
- This e-car GPS location data will be used to respond to customer support or maintenance issues such as a break-down or if a vehicle is stolen.
- The e-bike data will be shared with UCD Spatial Dynamics Labs for research purposes.

User data will be aggregated and analysed by project staff (DCC) for the purpose of understanding and increasing project success.

**The personal, including location, data processed as part of this service, will not be used for the purposes of tracking the location or monitoring the behaviour or vehicle users.**

### Research

- At weekly intervals throughout the project, historic (i.e. not real-time) GPS journey data from the e-cars and e-bikes will be shared with UCD Spatial Dynamics Lab for research purposes. This location data will be anonymous, i.e. the data will not be linked to any personally identifiable information (see section 10 below). The research carried out by UCD Spatial Dynamics Lab

### 3. The legal basis for processing the personal data

The legal basis for processing your data is *Contract*;

*“Processing is necessary for the performance of a contract to which the data subject is party”*

The Mobility Hub Service is provided to Dublin City Council staff in order to assist in work-related travel. This processing is therefore carried out in the performance of your employment contract with Dublin City Council.

### 4. Data Sharing

The personal data collected from this app will be processed securely by:

- **Dublin City Council: Data Controller**
- **Good Travel Software: Data Processor**
  - **Sixt (NiftiBusiness): Sub-Processor (provide e-car customer support)**
  - **BleeperBike: Sub-Processor (provide e-bike and bike customer support)**

Personal data will not be shared with or accessed by any other parties.

The scope of the processing is outlined in a Data Processing Agreement between DCC and (sub)Processors.

Anonymised journey data will be shared with our research partner UCD Spatial Dynamics Lab.

### 5. Security Measures

DCC, GTS and the sub-processors implement adequate, documented security measures in order to ensure that the integrity of your personal data is upheld and that all data is processed safely.

### 6. Retention period

Personal Data collected will be anonymised on or before 31st December 2022, with the option to extend this period by written instruction only.

## 7. Your Rights

You have the following rights, in certain circumstances and subject to applicable exemptions, in relation to your personal data:

- the right to access the personal data that we hold about you, together with other information about our processing of that personal data;
- the right to require us to rectify any inaccuracies in your personal data;
- the right to require us to erase your personal data;
- the right to request that we no longer process your personal data for particular purposes;
- the right to object to our use of your personal data or the way in which we process it; and
- The right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller.

Please note that to help protect your privacy, before granting access to personal data and you may be asked for proof of identity.

### **Subject Access Requests**

If you would like to exercise any of these rights, you can submit a written request to:

Data Protection Officer  
Dublin City Council Civic Offices  
Dublin 8  
Email: [dataprotection@dublincity.ie](mailto:dataprotection@dublincity.ie)

All valid requests will be processed without undue delay and in any event within one month of receipt of the request. This period may be extended by up to two further months where necessary.

### **Right of Complaint to the Office of the Data Protection Commission**

If you are not satisfied with the outcome of the response you received from the local authority in relation to your request, then you are entitled to make a complaint to the Data Protection Commission who may investigate the matter for you.

The Data Protection Commission's website is [www.dataprotection.ie](http://www.dataprotection.ie) or you can contact their Office at:

Lo Call Number: 1890 252 231

E-mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)

Postal Address: Data Protection Commission, Canal House, Station Road, Portarlinton, Co. Laois. R32 AP23.

## **8. Automated decision making**

Data collected will not be used for automated decision making.

## **9. Transferred to a non EEA country**

Your data will not be transferred to non EEA countries.

## **10. Further processing**

As noted above, anonymised journey data will be shared with our research partners UCD Spatial Dynamics Lab. This data will be historic, GPS data and will not include any personally identifiable information. This further processing for the purposes of scientific research is permitted under Article 5(1) (b) and Article 89(1) of the GDPR.