

Privacy Notice for **SMARTEDGE** Research Study

Personal data filmed with research vehicles is being used in scientific research. This privacy notice describes the use of the personal data in accordance with the General Data Protection Regulation (GDPR) of the European Union.

1. What is being studied in this research study? What is the purpose of processing of personal data?

The subject of the SMARTEDGE-project is to apply swarm intelligence and IoT technologies into traffic management.

Personal (camera) data is used to obtain awareness of the traffic situations around the vehicle, including other vehicles, pedestrian and cyclists.

Your personal data is used to get the location, speed, direction of road users. The identity of person or vehicle is not of interest, but from camera data it is possible to recognize people and vehicles.

It may be possible to blur faces or registration plate, but in order to do that, we need camera stream that is not filtered.

Your role in this study: The road users have no active role in the study

Research funding: HORIZON Europe funding under SmartEdge project, <https://www.smart-edge.eu/>, Aalto University and Technische Universität Berlin (TUB).

2. Personal data will be collected from the following sources:

Personal data is collected in the form of camera images captured at public road areas. The cameras are equipped in the research vehicles of Aalto University. Data gathering is performed by driving on public roads, simultaneously collecting video from the installed cameras. Aalto University owns all equipment related to the data gathering. Data is collected in the Helsinki metropolitan area, with a focus on the Otaniemi and Jätkäsaari regions. The data collection takes place during the years 2023 and 2024. Data gathering activities are carried out by Aalto University employees.

3. What personal data is processed?

Personal data is processed in the form of images containing vehicle license plates as well biometric data (=facial images). The personal data is included in the video during the recording sessions on public road areas. The goal of the recording is traffic-related research, development and analysis, and the personal data is a by-product in the material.

Data processing activities are carried out by Aalto University employees, Technische Universität Berlin (TUB) employees and University of Freiburg employees.

TUB employees will carry out training computer vision model to detect road users including pedestrians and cyclists/motorists. The workflow includes image annotations in semi-automatically ways. Anomization will be carried out when possible.

4. What special categories of data are processed?

A special category of personal data present in processing, are facial images of people who may not be informed of their rights or capable of upholding them. For example, children or people with disabilities may not be aware of their rights, or they might not be conscious of the passing research vehicles.

Another special category is scenarios that are sensitive in terms of recording. For example, recording of traffic accident sites might result in sensitive data.

5. How is personal data minimized in the study?

Your personal data will be a part of a large dataset and will not be used to identify you or be singled out once processed from the video. The applied image processing techniques analyse the data from a traffic or vehicle operation perspective.

Only data that is relevant for the research is recorded. Unnecessary recording is avoided, keeping the amount of personal data collection to a minimum.

Automated blurring is not possible without compromising the data quality.

6. Legal basis for processing of personal data

The processing of personal data, including special category data, is required for the performance of a **task carried out in the public interest, namely scientific research.**

7. Sharing of Personal Data

Aalto University may need to share some of the research data with a third-party collaborators named in this document, who are also processors of your personal data.

These collaborators include:

- Technische Universität Berlin
- University of Freiburg

Aalto University has data processing agreements with these collaborators and they are only allowed to process your data according to data processing agreement that includes processing instructions AND is using the same legal basis as described above.

The data is shared and transferred via Aalto OneDrive. Access to the OneDrive folder is only provided for the time needed by the third-party collaborator for research purposes.

Third-party collaborators will NOT have access to your name or contact information.

Personal data collected in this study is not shared with law enforcement agencies, unless required by law.

8. Transfer of Personal Data to Non-EU/EEA countries

In this project, Personal Data can be shared to the Non-EU/EEA country of Switzerland, which offers adequate protection of personal data (2000/518/EC: Commission Decision of 26 July 2000 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data)

Personal data is not transferred to any other non-EU/EAA countries.

9. Storage period of your data and anonymisation

The data will be stored in Otaniemi, Espoo, on Aalto University controlled and owned devices. The named third-party collaborators will store data on devices controlled and owned by their respective organization. The third-party organizations will only store data during the study. The expected duration of this study is 8/2023 – 12/2024.

Additionally, data may be archived indefinitely as a part of a large Aalto University data collection of traffic videos (Aalto University Transportation Engineering Traffic Repository).

10. The rights of the study participant in a scientific study

According to the General Data Protection Regulation (GDPR), subjects have the right:

- to obtain information on the processing of their personal data
- of access to their data
- to request rectification of their data
- to request restricting the processing of their data
- to object to the processing of their data
- right to erasure, if the grounds of article 17.1 of GDPR apply and if processing is no longer needed for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right to erasure is not likely to render impossible or seriously impair the scientific research.

If the purposes for which a controller processes personal data do not or do no longer require the identification of a data subject by the controller, the controller shall not be obliged to maintain, acquire or process additional information in order to identify the data or the data subject for the sole purpose of complying with the GDPR.

If the controller cannot identify the data related to a data subject, the rights of access, rectification, objection and erasure shall not apply, except if the data subject provides additional information enabling his or her identification and the identification of the research data that relates to data subject.

Data is being processed for the purposes of scientific research, and the data is not used in decision-making related to the participant.

To exercise his or her rights, the data subject should contact the Data Protection Officer of Aalto University, or the research study contact person.

11. More information on the study and the exercising of your rights

The controller in this study is Aalto University.

The contact person in matters related to the research study:

lisakki Kosonen, Department of Built Environment, School of Engineering, Aalto University

name.surname@aalto.fi, +358 50 5050457

The research participant must contact Aalto University's data protection officer if they have questions or demands related to the processing of personal data.

Data Protection Officer Anni Tuomela +358947001 dpo@aalto.fi

In this customer service portal, you can make requests personal data requests based on your rights [Home · Consent Management \(aalto.fi\)](#) .

- a. If the research participant sees that their data has been processed in violation of the General Data Protection Regulation or data protection legislation, the participant has the right to lodge a complaint with the supervisory authority, the Data Protection Ombudsman (see more: tietosuoja.fi).
-