
W3C Telematics Device Program

Purpose

W3C has identified a need for vehicle data in order to effectively demonstrate the ongoing work on vehicle standards development. In order to meet this need, the W3C telematics device program (the “Program”) was drafted. Vehicle data can be obtained via an OBD telematics device, or through OEM connected services, when the vehicle owner has provided consent for this use. The “W3C Device Program” is designed to both inform participants of the program, and provide record of informed consent for collection of data from their vehicle for these noted purposes.

Program Description

The Program will be administered in accordance with W3C’s [Privacy Policy](#).

To achieve the purpose above, W3C working group members are encouraged to become familiar with how to enable data collection (either through OEM connected services or through third party telematics solutions). Working group members are encouraged to take part in the development, integrity, testing and promotion of the Program by:

- regularly checking that your data is accurate
- reporting any malfunctions and/or safety concerns

If any malfunctions or driveability issues / safety concerns arise with the telematics device in your vehicle for data collection, you must immediately remove the device from your vehicle and report the issue to the equipment manufacturer.

The request to participate in the Program is also open to family members and friends of W3C working group members, pending approval to participate by W3C lead (Ted: Guild) and hardware manufacturer(s) or OEM who will be collecting and relaying the data. It is the responsibility of the participant (of the W3C working group) to share a copy of this program policy and obtain the necessary consent prior to participation in the Program. The respective telematics company and automotive manufacturer reserves the right to limit the total number of devices made available and which specific data points are collected and transferred in this program:

Any person participating in the program’s data collection must be informed of these data collection policies and agree to hold W3C harmless for any data collection or inadvertent disclosure. Participants shall agree to make other passengers or drivers aware of the data collection as well. Their sole remedy for breach is to uninstall the device and cease participation.

The following data is captured in the course of participation in the Program:

- Vehicle data (e.g. VIN*, odometer, speed, location information, engine diagnostic data)
- Device data (e.g. GPS, accelerometer, debug, input/output peripheral related data)
- Login information - email
- If applicable, third party device serial number

By participating in the Program, you are instructing W3C to process your personal and vehicle data for the purpose described above.

W3C will not use Program Data for commercial purposes or to evaluate work performance of participants or track the location of participants and/or alternate drivers of their vehicles.

Installing the Device (Optional)

For those using a telematics device, proper installation of a device is crucial in ensuring that the device functions properly. Improper usage or installation of the device has the potential to cause damage to you or your vehicle.

Please utilize the appropriate installation instructions (enclosed in packaging of your device) for your device.

Program Device Data

W3C may use individual or aggregated data of Program devices (“Program Device Data”) in order to fulfill the purpose of the Program. Individuals or groups that may process the data, include the following:

- **W3C working group members**
- **Other approved entities as individually approved by W3C Automotive Lead (Ted Guild) and Group Chairs (“Program Committee”)**
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Other reasonable purposes may be added with the approval of the **Program Committee data privacy officer** in the future, and, correspondingly, **Program Committee W3C** will establish a legitimate purpose or will obtain the required consent from participants for the new purpose in compliance with applicable law.

Program device data may be retained for as long as it is required and in compliance with W3C’s Privacy Policy and Technical and Organizational Measures **Statement (“TOMS”) link needed*** and other policies applicable to your employment. Participants have the option to delete their own vehicle data from their database by using the W3C portal whenever they choose, or can remove themselves from the Program altogether **VERIFY THIS EXISTS***.

STRICT PROHIBITION ON “SNOOPING”

SNOOPING WILL NOT BE TOLERATED. Snooping can be described as accessing, using, viewing, storing, or making available Program data for other than approved purposes. Logs are maintained of all program device data usage ***VERIFY (equivalent for W3C server, Geotab has auditlogs for their SaaS)**. Participants may use logs to ascertain usage of their Program Device Data (when and by whom). Any working group member found to have violated this policy will be subject to discipline, **including removal from working group for cause.**

If you are in any way unsure whether or not you are allowed to access another participant's Program Device Data, speak with the **Program Committee data privacy officer** **before** accessing the data.

Safeguards and Concerns

W3C will ensure that physical, organizational, and technological safeguards are in place to protect Program Device Data. More information about such measures are available in W3C’s **PUBLIC FACING ORGANIZATIONAL / TECHNICAL MEASURES FOR DATA SECURITY** document.

Program participants are expected to assign generic labels to their vehicle description* (such as letter and number combinations) rather than names, initials, or other personal identifiers for the purpose of pseudonymizing their vehicle related data.

Program participants who request more than one Program device or who place a Program device in a vehicle which is not driven exclusively by them agree to inform all drivers of these vehicles that a Program device is installed and that the use of the Program Device Data is subject to this policy.

Addressing Privacy Concerns

W3C encourages team members to share their privacy concerns. This provides valuable feedback and helps W3C to better understand and anticipate privacy concerns that may exist across the global user base. It also enables W3C to improve its communications and make system improvements to address privacy issues. In addition, privacy concerns will be addressed as follows:

- Participants should review and understand the W3C [Privacy Policy](#) ~~LINK TO PRIVACY POLICY~~, the W3C [Code of Ethics and Professional Conduct](#) ~~INSERT REFERENCE MATERIAL~~, the privacy and security checks and balances which include this policy and the **audit log feature?** - team members should familiarize themselves with this feature and use it. W3C employees based in Europe are encouraged to review the **Privacy Notice** as well.
- Participants are expected to use fictitious (pseudonymized) names (e.g. cartoon/movie characters, nicknames, etc) that do not allow conclusions as to the real participant using the system.
- Participants with questions should share their concerns with the [Program Committee](#) ~~data privacy officer~~ so we can understand and properly address them. Participants do have the option to opt out of the program altogether and opting out will not affect W3C working group status.

Oversight Provided by Chief Privacy Officer*

In order to ensure that Program device data is used properly, the data privacy officer provides oversight and is accountable for resolving complaints and updating this policy as necessary. Please direct any questions, concerns, or complaints to the data privacy officer at **INSERT CONTACT**.

Definitions

Throughout its privacy policies, W3C uses the following definitions:

“Data privacy officer” means W3C’s data privacy officer, **XXXXXXXX**, or his designate.

“Consent” means the individual provided permission, either expressly (verbally or in writing, including forms), or implicitly, authorizing W3C to collect, use, retain, or disclose their personal data for the purpose(s) set out by W3C.

“Personal Data” means any information about, or that can reasonably be expected to be related to, an identifiable natural person.