

## Systemic Change Towards Sustainable Commuting PRIVACY NOTICE OF THE PROJECT

Articles 13 and 14 of the EU General  
Data Protection Regulation (2016/679)

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### ***What is the purpose for which the data is collected?***

The Systemic Change Towards Sustainable Commuting project (Sycla) is a city pilot that examines the current state of commuting in Lahti and identifies individual and organisational barriers and incentives to sustainable commuting. The project will experiment with 'nudging' methods for low- and zero-emission commuting and monitor the impact of the experiments in pilot organisations in Lahti. Baseline data on the current state of commuting in the target organisations will be collected through workplace observations, employee surveys and interviews. The workplaces will implement their chosen development measures, guided and supported by the project. The impact of the implemented interventions on commuting will be evaluated during the project. The City of Lahti will use the results of the project to promote systemic mobility change in the Lahti city region and to support the development of a sustainable urban mobility programme. The project is implemented by the City of Lahti (coordinator), LUT University, LAB University of Applied Sciences and Health and Wellbeing County of Päijät-Häme.

As project activities, the project will

- 1) study the current state of commuting in Lahti, and the impact of nudging interventions at municipal, organisational and individual level,
- 2) identify, through surveys, interviews and/or workshops, the information and conditions concerning commuting of staff, commuting patterns, commuting benefits offered by the employer, commuting conditions at the workplace (e.g. facilities and equipment), well-being aspects of commuting, and satisfaction and opinions regarding commuting, and develop organisation-specific situation analyses and action plans based on the mapping. Surveys, interviews and workshops will be used to gather information on the impact of the development measures on commuting patterns and staff's experience of changes in their well-being. These surveys will be used to analyse commuting in the city of Lahti on a larger scale, and the results will be used to develop urban mobility planning.



- 3) identify, through interviews and observations, the benefits and conditions related to commuting in the participating organisations (e.g. employment benefits, social facilities, parking, cycle parks, etc.) and uses them as a basis for an organisation-specific current-state-analysis and action plans.
- 4) map the areas at risk of accidents in light traffic, based on data provided by the participating organisations. The data collected will be used for urban mobility development.
- 5) organise workshops for participating organisations to review the action plans and familiarise them with user-centered decision-making.
- 6) guides and supports organisations in the selection and implementation of development measures (interventions) to nudge sustainable commuting.
- 7) assess the impact of interventions in the target organisations from different perspectives (environmental, welfare, cultural, social and economic impacts).
- 8) use the results and information obtained to develop the City of Lahti's SUMP programme and investment plans, to evaluate the City of Lahti's transport planning, and to define the City of Lahti's role in supporting a shift to sustainable commuting among both employees and businesses.

Personal data of persons participating in project activities will be collected and used for the implementation of the above-mentioned project activities, and for communication within the project.

Personal data will also be used for communication about the project. Project activities, such as meetings and workshops, are communicated to the pilot organisations that have provided their contact details to the project actors. In addition, communication will take place via social media and networks.

As part of the project activities, research data will be collected from staff in the participating organisations on: the conditions of commuting, commuting patterns, employer-provided commuting benefits, physical conditions of the workplace (e.g. facilities and equipment), commuting-related well-being and satisfaction, and opinions on commuting and related issues, as well as on employer-provided opportunities to promote sustainable commuting for their employees through surveys and interviews. This data collection includes surveys, interviews and analysis of employees in the participating organisations, as well as observations on the premises of the participating organisations.

The resulting survey data that includes personal data will be analysed during the project to determine the current status of commuting, to identify measures to encourage sustainable commuting and to assess the impact of the interventions in the pilot organisations. The collected data will also be used to evaluate the impact of



the project and its activities. The collected data will be anonymised by the end of the project. After the end of the project, the anonymised data will be archived as described below in this privacy notice. The anonymised research data may be used during or after the project for research, publications, development and education.

### ***What data do we collect?***

We collect and record the following information from individuals when they register for or participate in project events: name, organisation, job title, telephone number and email, special dietary needs. Any photography or video recording at project events will be notified on arrival at the event. The collection, storage and publication of identifiable photographs and video material in connection with project activities will be subject to the individual's consent. For remote events, screenshots will be taken to serve as a list of names, which will allow us to verify to the project sponsor that the event took place, if necessary.

The impact of the interventions in the participating organisations and the change in staff commuting will be assessed through surveys and interviews, as well as documentation of meetings and workshops. For the purpose of this study, questionnaire responses and interview responses from participants in the interventions, as well as discussions from meetings and workshops, will be recorded. If the interview is recorded, an audio recording and a transcribed version will be recorded. Photography and video recording during observations will be subject to the explicit consent of the participant organisation.

The project is supported by the Net Zero Cities Mission Pilots (Horizon 2020) programme. The project will collect data from the participating organisations, according to the donor's instructions, to monitor the project's impact.

### ***On what basis do we process the data?***

The basis for processing personal data is consent. This means, for example, that by registering for a project event, a participant gives his/her consent for his/her data to be included in the list of participants.

### ***Where we collect personal data from***

Personal data is collected from the data subject himself/herself.

### ***To whom is the data transferred?***

The project will transfer personal data to the following external processors:

- event management services (such as Lyyti or Webropol) to collect and process registrations for events and workshops. The project partners LAB



and LUT and the service provider have signed an agreement on personal data processing practices.

- an online form service from an external service provider (such as Webropol, Maptionnaire) is used to collect survey responses and feedback.
- personal data (e.g. name and contact details, survey and interview responses) are updated and stored on internal servers of the implementing organisations (such as OneDrive for Business and Microsoft Teams).

To transcribe the interviews, i.e. translate them into text format, you can use Microsoft Teams or a service provider that is committed to the secure processing of personal data and destroys the audio copy after transcription.

Project staff will have access to the personal data in the register during the project. For research data, only project staff will have access to data containing direct identifiers (such as interview recordings and questionnaire responses at the individual level). The survey data describe the commuting patterns of staff in the organisations. The anonymised survey data can be used by the staff of the implementing organisation for publications, research, development and teaching purposes.

### ***Transfer or disclosure of data outside the EU or the European Economic Area***

The personal data collected will not be transferred outside the EU or the European Economic Area.

### ***Secure storage of collected data***

The digital materials are stored on secure servers and in services certified as secure by the City of Lahti and the sub-projects (LUT University, LAB University of Applied Sciences, Päijät-Häme Welfare Region). Access to the data is restricted to project staff during the project.

The research data generated by the project will be available anonymously for research, teaching and development purposes related to the development of sustainable mobility, subject to the permission of the participants. During the analysis phase, direct identifiers and indirect identifiers that are sufficient to identify an individual will be removed from the research data. The anonymised data will be archived on the implementers' secure servers. The interview data will be archived in transcribed form, and the interview recordings will be deleted by the end of the project.

### ***How long will the data be stored?***



Personal data of participants in project activities will be stored for communication and contact purposes for the duration of the project, from 1 June 2023 to 31 May 2025 (or until the official end of the project after any extension period).

Project monitoring material such as participant lists and personal data forms will be kept and archived according to the donor's instructions for at least 5 years after the due date of the last payment of the project.

Anonymised research data collected during the project will be kept until the manuscripts reporting the results of the research are published.

### ***Automated decision-making***

There is no automatic decision-making when processing the data.

### ***Rights of the data subject***

The data subject has the right to withdraw his or her consent where the processing of personal data is based on consent.

The data subject has the right to lodge a complaint with the Office of the Data Protection Ombudsman if the data subject considers that the processing of personal data concerning him or her has infringed the applicable data protection legislation.

The data subject has the following rights under the EU General Data Protection Regulation:

- (a) The right of the data subject to verify the data concerning him or her.
- (b) The right to rectification of his/her data.
- (c) The right of the data subject to obtain the erasure of his or her data.
- (d) The right of the data subject to have his or her data rectified.
- (e) The right of the data subject to have his or her data transmitted to another controller.

If the data subject wishes to exercise his/her rights under data protection legislation, he/she is invited to contact the Data Protection Officer, whose contact details are given below.

### **Information about the register**

The register of project Systemic Change Towards Sustainable Commuting.  
Project period: 1.6.2023-31.5.2025

### **Keepers of the joint register**

City of Lahti



Business ID: 0149669-3  
Address: Harjukatu 31, 15100 Lahti  
Phone: +358 3 814 2355

LUT University  
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LAB University of Applied Sciences  
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Health and Wellbeing County of Päijät-Häme  
Business ID: 3221309-4  
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Phone: +358 3 819 11

## Parties involved in a project as a joint project and division of responsibilities

The Systemic Change Towards Sustainable Commuting project is a joint project of the City of Lahti, LAB University of Applied Sciences, LUT University and Päijät-Häme Welfare Region. The City of Lahti is the project manager and coordinator. However, all project participants have the same rights and obligations.

Research data will be collected by the different project partners in a jointly defined way. The data will be processed and analysed in cooperation with all project promoters in accordance with the project plan. The project is funded by NetZeroCities, with Horizon 2020 funding.

## Contact information

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### Project leader in charge

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### Those carrying out the research

Project managers, project workers and specialists, trainees and students involved in project implementation.

### Data Protection Officers

Name: Tiina Häyrinen  
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