

Privacy Principles for Vehicle Technologies and Services

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A breakthrough in privacy

- The Alliance of Automobile Manufacturers and Global Automakers came together in 2014 to create a set of privacy principles for vehicle technologies and services
- Members of the associations subscribed and agreed to adhere to the baseline privacy commitments established in the principles

Development of the Principles

- The auto industry has long recognized the importance of consumer trust
- The Principles were developed to reflect the industry's commitment to consumer privacy
- Throughout the spring and summer of 2014, and in consultation with key stakeholders, the Alliance and Global Automakers developed the Principles

Key elements of the Principles

- *Principles* create fundamental set of expectations for the collection, use and sharing of data
- FTC guidance and enforcement principles are embodied in the *Principles*
- Sensitive personal information (geolocation, biometric, driver behavior) subject to *opt-in* when data to be used for marketing or shared with unaffiliated 3d parties for their own use
- Bright-line restrictions on disclosure of geolocation information to the government

Covered information

- *Identifiable information* that is retrieved from vehicles by or on behalf of participating company
- *Principles* apply to *registration information* and *data from vehicle technologies and services*

Key commitments

- Transparency
 - Clear, meaningful notices about the collection, use and sharing of Covered Information
 - Special attention to notice for geolocation, biometrics and driver behavior information
- Choice
 - Opt-in for marketing and unaffiliated third-party use of sensitive information
 - Choice may not be an option where essential to safety, compliance and warranty
- Accountability
 - Adoption of *Principles* imposes obligations enforceable through consumer protection laws, e.g. Section 5 of the FTC Act (which prohibits unfair or deceptive trade practices)
 - Requirement of reasonable internal accountability mechanisms
 - Reasonable steps to ensure 3d party service-providers' adherence to the *Principles* and others to be urged on privacy

Next steps

- Confirming that practices align with commitments
- Consider updating the *Principles* to address new developments
- Consider expanding the scope of the *Principles* to include other participants in the ecosystem
- Consider alignment of the *Principles* with developing regulations