

(To be filled out in the EDPS' office)
REGISTER NUMBER: 1428

(To be filled out in the EDPS' office)

NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 16-01-2017

CASE NUMBER: 2017-0080

INSTITUTION: EC DG JRC

LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001⁽¹⁾

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

CONTROLLER : NICHOLL CIARAN

E-MAIL: Ciaran.NICHOLL@ec.europa.eu

DELEGATE : CALDEIRA SANDRA

E-MAIL: Sandra.CALDEIRA@ec.europa.eu

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF PERSONAL DATA

THE EUROPEAN COMMISSION
DG JRC - DIRECTORATE F.1

3/ NAME AND DESCRIPTION OF THE PROCESSING

NAME: Social Biking: A field study on Physical Activity and Social Networks

JRC will measure, in different cities (in Germany during the pilot in 2017) and in other Member States (in 2018), the impact of different peer incentive schemes on cycling activities of people. A randomised trial will be set through the use of the Bike-Prints mobile application and a web platform that will be developed to measure the physical activity and the social interactions of the participants. Social based incentives, based on the existing social networks and different behavioural nudges, will be used to incentivize participants to exercise more with their friends or partners. A detailed experimental design

¹ OJ L 8, 12.01.2001.

has been developed, based on behavioural economics methodologies that will allow the JRC-researchers to measure the behavioural change achieved by the different incentives.

In the first phase of our intervention (2017), the JRC will develop the Bike-Prints mobile application and web-platform for data collection and analysis respectively. The software and the intervention protocol will be tested in a pilot intervention study in different cities in Germany for 4 months in the Spring-Summer 2017, in collaboration with local authorities, sports and bicycle associations and educational institutes. During the second phase (in 2018) we will further disseminate and scale up the project, hopefully in different member states. The role of JRC in this phase will be to coordinate the different projects, process the data and provide any technical support related to the Bike-Prints mobile application and web platform. The data will be collected through the Bike-Prints mob application and exclusively processed by the Health in Society Unit of Directorate F – Health, Consumers and Reference Materials, Joint Research Centre.

The registration will be electronic after the installation of the application. It will contain detailed information related to S-B rules and instructions and an informed consent which should be signed (electronically) by all adult participants as a prerequisite for participating in the game. All adult participants (smart phone users) who sign the informed consent and comply with the general rules of S-B will be eligible to participate. Underage smart-phone users will be eligible to jointly participate in S-B with their schoolmates, given that the school authority will undertake the joint registration of all interested students after having collected the informed consents (hard copies) signed by students' parents. Teachers will be used only for the registration process of underage but they will not have access to any recorded or self-reported data. However, as they will provide students with the passwords they will be requested to sign a confidentiality declaration.

Any participant has the right to quit from the game at any time. Participants will also be asked to provide some general information (email address, gender, age, nationality, height and weight) and a nickname. However, as the game is designed to be anonymous, participants' identity will never be asked and personal information will never be disclosed. The study involves collecting of personal data-information, measurement of Physical Activity and movement tracking through the Bike Prints mob application and therefore constituting the processing operation under Regulation 45/2001. Participation in the study is voluntary and demands the approval (electronically during app installation) either by the participants or by the parents (through teachers) in case of underage. Additional to this, every participant (or parent) grants his/her informed and written consent (enclosed), prior to the collection of the required personal data.

A detailed draft proposal of the project including the registration process and the game rules is enclosed.

The Joint Research Centre (JRC) of European Commission with the project BeHEALTHi (Behavioural Health-Interventions) is looking to support the Childhood Obesity Action plan by promoting physical activity. The Social-Biking project aims to motivating European citizens to move more and use more environmentally sustainable forms of transport. It has been designed to collect primary data related to physical activity and social networks. The analysis of the data will allow the JRC to determine the most efficient social-based incentives in promoting physical activity.

The whole idea is based on a preliminary study developed and coordinated by JRC "Individual vs. Peer rewards for increasing children's physical activity: A school based study", which was register by the European Data Protection Supervisor on the 07/02/2014 (Notification-DPO-3669.1). This study was refereeing to children, while the Social Biking project is expected to cover a broader population including both adults and underage mobile users.

The data will be collected through the Bike-Prints mob application and exclusively processed by the Health in Society Unit of Directorate F – Health, Consumers and Reference Materials, Joint Research Centre. Teachers will be used only for the registration process of underage but they will not have access to any recorded or self-reported data. However, as they will provide students with the passwords they will be requested to sign a confidentiality declaration.

4/ PURPOSE OR PURPOSES OF THE PROCESSING, AND PROCESSORS

The Head of the "Health in Society" Unit (referred to hereafter as Data Controller) collects and uses your personal information to carry out research endeavour aimed at observing phenomena belonging to our directorate sphere of activity and to record their evolution in time. In line with the mission of the JRC, the results gathered during the studies are then used in assessment of the policy options relating to health and consumer protection.

PROCESSORS:

--

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

As data subjects are considered a) all adults who have electronically signed this study's informed consent during the installation of the Bike-Prints mobile application, and b) all underage students whose school teacher has registered them in the system and authorised (through password) the instalment of the Bike-Prints mobile application.

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (*including, if applicable, special categories of data (Article 10) and/or origin of data*).

The personal data collected and further processed are:

A) Self-reported:

Email address of the participant Country and Postal Code of the participant Gender of the participant, Nationality of the participant, Age in months (not precise date of birth) of the participant, Height (in cm) and weight (in kg) of the participant,

B) Recorded by the Bike-Prints application:

Data on Physical Activity (km cycled) of the participants which will be recorded by the app occasionally and only after the voluntary activation of the app by the user. This piece of data will be used during the study for measuring the relative performance of the participants and rewarding them accordingly. This information will also be the main dependent variable of the study measuring the effect of the different incentives in physical activity.

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

The enclosed Privacy Statement shall be delivered to each data subject through the Bike-Prints mob application.

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

The data subjects (or their parents in case of underage) can use their rights to access their data held by the controller, at any time. The data subject shall have the right to obtain from the controller the rectification without delay of inaccurate or incomplete personal data. In order for anonymity to be protected, mob users will be able to request their data through the mob application just by using their username.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

The data is processed automatically by a computer. The back end server will be hosted in the Joint Research Centre's premises.

10/ STORAGE MEDIA OF DATA

The data is stored on Joint Research Centre's server.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

The mission statement of the Directorate F, JRC – basic act of the Directorate – granting the mandate to carry out the research in the field of health and consumer protection and in particular in the area of the public health policy support. Title XIV of the Treaty on the functioning of the EU, defining the Union's obligations and tasks in the area of the public health. Participation in the field experiments is voluntary. Every adult (parent or legal guardian in case of underage) grants his/her consent to the collection of the required personal data (Article 5.d of the Regulation 45/2001). The processing falls under Art. 27 as data relating to health is processed (Art. 27 (a)).

12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENT TO WHOM THE DATA MIGHT BE DISCLOSED

The recipients of the results of the scientific analysis: Directorate F, JRC scientific officers.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

The Data Controller only keeps the data for the time necessary to fulfil the purpose of collection or further processing (the expected duration of the study will be 18 months). Once the study is completed, they will be used for drafting the study results which will be ready within 6 months after the completion of the study. The personal data will be deleted after one year from the completion of the report

summarising the study results.

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

Fifteen (15) days-time allocated to satisfy the request from individuals who would like to exercise their rights to:1) obtain from the controller the blocking of data,2) ask for erasure of data if their processing is unlawful.

14/ HISTORICAL, STATISTICAL OR SCIENTIFIC PURPOSES

If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification.

15/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

--

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING

Data relating to health is processed.

Article 27.2.(a) Processing of data relating to health and to suspected offenses, offenses, criminal convictions or security measures.

17/ COMMENTS

--

PLACE AND DATE: BRUXELLES, 16.01.2017

DATA PROTECTION OFFICER: RENAUDIÈRE PHILIPPE

INSTITUTION OR BODY: THE EUROPEAN COMMISSION