

Federation of European Motorcyclists' Associations (FEMA)



View of FEMA on the EDPB Guidelines 1/2020 on processing personal data in the context of connected vehicles and mobility related applications (version 1, adopted 28 January 2020)

We are concerned about the use of the data of vehicles, including motorcycles and other powered two- and three-wheeled vehicles, by motorcycle manufacturers and others and the privacy of their owners. Therefore we are glad with the Guidelines of EDPB and think they can contribute to the enforcement of right of ownership of data and the protection of the personal life space of vehicle owners and -users.

However, the scope of the Guidelines is not clear enough. In the Guidelines (connected) vehicles are mentioned in several places, while in other places cars are mentioned. This gives the impression that only cars (category M1 vehicles?) are in the scope of the Guidelines and not other vehicles like all categories L, N1, M2, N2. Some motorcycles are already connected and at least one brand (BMW) already downloads (personal) data from the motorcycle when it is serviced by a BMW dealer or workshop without the explicit consent or often even knowledge from the owner.

As federation of motorcyclists' rights organizations in Europe we are very concerned with the developments in data gathering and processing and we think that motorcycles and other L-category vehicles must be implicitly included in the scope of the Guidelines.