



Privacy and modern cars through a dual lens

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COMMUNICATION DOMAINS



V2V



V2I



IV



U2V



Car Maker



Third parties



Emergency services

CAR COMPONENTS

- CAN-Bus
- OBD-II port
- Sensors
- Electronic Control Units
- Autonomous vehicle imaging



CAR COMPONENTS

- Infotainment system
- E-call box / SIM Card
- GPS
- Smartphone integration
- Cabin monitoring system

TYPES OF DATA



VEHICLE:
functioning of vehicle, maintenance status, ECU data and operations



DRIVER:
physical characteristics, driving style, driver's behaviour



LOCATION:
geographic location of a vehicle, history and route tracking, speed



ACCOUNT:
personal accounts, personal and special category

Art 12. GDPR “*The controller of the data, has to provide information to the user in a concise, transparent, intelligible and easily accessible form, using clear and plain language*”

Focus: Understand if the privacy policies are compliant with article 12 of the GDPR

Approach: Analysis of the privacy policies of twelve car manufacturers and study of readability indices evaluating the policy

Steps:

1. Privacy policy collection
2. Policy readability analysis



Privacy policy collection

Twelve carmakers company: the top ten most famous car companies in Europe plus Tesla and KIA.

We download the privacy policy by using two different channels:

- During the installation of the respective app
- From the company website and contacting the customer service



Policy readability analysis

Textstat, a Python library to calculate statistics from text, that allows also to compute readability indexes.

We calculate the *Coleman-Liau* index, the *SMOG* index, the *Automated Readability* Index and the *Flesch Reading Ease* Index.

The first three indexes use the U.S. school grade to label a text as “difficult” or “easy” to read.

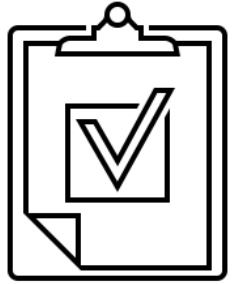
Score/Grade	Education Level
1-4	Elementary School
5-8	Middle School
9-12	High School
13-16	Undergraduate
17+	Graduate

- **CLI**: depends on the complexity of the words, measured from the number of letters, and the complexity of the sentences.
- **SMOG**: uses the polysyllables (words of 3 or more syllables) in a certain number of sentences (at least 30).
- **ARI**: takes into consideration also the number of characters, in addition to the number of words and sentences.
- **FREI**: that differs from all the three previous indexes because it outputs a score instead of the school grade.
- **GIDR**: is calculated by combining the previous four indexes: the lowest value “0” indicates the most readable privacy policy, while the value “100” the most difficult among the selected documents.

Privacy Policies Metrics							
Company	Number of Words	Number of Sentences	CLI	SMOG	ARI	FREI	GIDR
Ford	9744	1327	8.7	10.0	5.1	58.3	0.0
Peugeot	2151	437	9.0	9.0	6.0	47.7	3.6
Kia	22043	3096	9.6	10.4	5.8	49.8	10.7
Skoda	5831	860	9.9	9.9	6.1	49.7	12.5
Mercedes	8591	1387	10.0	10.0	6.0	44.0	14.3
Opel	2438	323	11.0	10.0	7.0	46.6	21.4
Audi	13661	1410	10.4	11.1	6.8	49.4	23.2
BMW	991	119	11.1	10.5	7.1	49.1	25.0
Tesla	13224	1453	10.8	11.1	7.0	49.5	25.0
Volkswagen	11742	1206	12.2	11.8	8.3	42.1	42.9
Toyota	3279	263	11.7	13.2	8.8	43.6	48.2
Renault	2568	94	12.7	17.3	15.9	37.3	100.0

Questionnaire design:

- Basic information
- Capturing concerns on privacy
- Capturing perceptions of trust



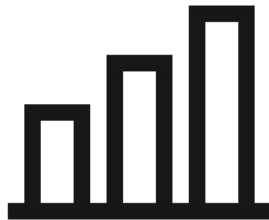
Participant

- Choice of the subjects
- Sample of 88 respondents



Essential sample statistics

Explanation of results and presentation in tables



A 7-point balanced Likert scale is used for most of the questions in the questionnaire

Simplifying the analysis: grouping the 7 levels of agreement into 3 categories

Levels of agreement	Categories
Strongly agree	Agreeing
Agree	
Somewhat agree	
Neither agree nor disagree	Undecided
Somewhat disagree	Disagreeing
Disagree	
Strongly disagree	

Core questionnaire questions

- **Q1:** evaluates the driver's knowledge on modern cars.
- **Q2:** asks respondents whether or not they agree that modern cars are similar to modern computers.
- **Q3:** select all the categories of data they think a car collects.
- **Q4:** asks whether they think it is necessary to collect personal data to achieve full vehicle functionality.
- **Q5:** asks whether personal data collected by a modern car about its driver needs to be transmitted over the internet.
- **Q6:** asks whether participants agree that a modern vehicle safeguards the life of its driver.
- **Q7:** asks participants whether a modern car protects its driver's personal data better than its driver's life.
- **Q8:** asks whether the data collected from the vehicle is legitimately processed according to the relevant regulations.
- **Q9:** asks if participants believe that the personal data collected is systematically analysed and evaluated using automated processes (including proling).
- **Q10:** asks whether the participants feel that the data transmitted over the Internet are protected by adequate technologies.

Analysis of findings

	Q1
Knowledgeable about modern cars	70%
Average knowledge	17%
Not knowledgeable about modern cars	13%

	Q3
Personal data about the driver	69
Public data about the driver	56
Public data not about the driver	44
Special categories of personal data about the driver	15
Financial data about the driver	15
No data at all	1

	Q2	Q4	Q5	Q6	Q7	Q8	Q9	Q10
Agreeing	83%	32%	26%	80%	22%	50%	52%	51%
Disagreeing	6%	33%	48%	6%	41%	34%	31%	23%
Undecided	11%	35%	26%	14%	37%	16%	17%	26%

- Reading and understanding the twelve privacy policy documents requires, a high level of education equal to the last years of high school or the first years of university to be comprehensible in every part.
- The interviewed sample feel quite informed about modern vehicles.
- Collection of personal data, the participants seem to be equally divided.
- Q9 tell us that half of the sample thinks that their data is analysed and studied by the vehicle systems in order to evaluate some personal aspects.
- Regarding the transmission of collected data just a few of the participants think it is truly necessary.



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Thank you for your attention

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