

Systemic Change Towards Sustainable Commuting DATA PROTECTION

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

Drafted 6.10.2023

Updated 16.11.2023, 10.6.2024

What is the purpose for which the data is collected?

The Systemic Change Towards Sustainable Commuting (Sycla) project is an urban pilot that examines the current state of commuting in Lahti and identifies individual and organizational barriers and incentives for sustainable commuting. The project pilots so-called "nudging" interventions to encourage low-emission and emission-free commuting options and monitors the impacts of these interventions in pilot organizations in Lahti. Baseline data on current commuting practices is collected from the pilot organizations through workplace observations, employee surveys, and interviews. The pilot organizations will implement selected development measures, guided and supported by the project. The impacts of the interventions on commuting behavior will be assessed during the project. The City of Lahti will use the project results to promote systemic change in mobility across the Lahti urban area and support the development of the city's sustainable urban mobility program. The project is carried out by City of Lahti (coordinator), LUT University, LAB University of Applied Sciences, and Päijät-Häme Wellbeing Services County.

The project activities include:

1. Investigating nudging interventions: The effectiveness of nudging interventions for sustainable commuting will be examined at the municipal, organizational, and individual levels.
2. Mapping commuting data: Data related to the commuting experiences and conditions of the staff in pilot organizations will be collected through surveys, interviews, and/or workshops. Collected data includes commuting practices, employer-provided commuting benefits, workplace conditions related to commuting (e.g., facilities and equipment), wellness aspects of commuting, and satisfaction and opinions regarding commuting. Based on this information, organization-specific current state analyses and action plans will be developed.



Data on the impacts of development measures on commuting practices and staff experiences regarding changes in well-being will also be gathered through surveys, interviews, and workshops. The collected data will be analyzed to provide a broader understanding of commuting in the City of Lahti, and the results will be utilized for urban transport development.

3. Assessing commuting benefits and conditions: Interviews and observations will be conducted to identify the commuting-related benefits and conditions in pilot organizations (e.g., employment benefits, social facilities, parking, bike storage, etc.). Based on this information, organization-specific current state analyses and action plans will be created.
4. Identifying accident risk areas: Areas with accident risks for non-motorized traffic will be mapped based on data provided by the participant organizations. This information will be utilized for urban transport development.
5. Organizing result meetings and workshops: Meetings and workshops will be arranged for pilot organizations to review the developed action plans and familiarize them with user-centered decision-making.
6. Guiding and supporting organizations: Pilot organizations will be guided and supported in selecting and implementing commuting development measures (interventions).
7. Evaluating Interventions: The effectiveness of the interventions implemented in the target organizations will be assessed from various perspectives (environmental, well-being, cultural, social, and economic impacts).
8. Utilizing results for urban mobility planning: The obtained results and information will be used to enhance the City of Lahti's Sustainable Urban Mobility Plan (SUMP) and investment plans, assess traffic planning in Lahti, and define the city's role in supporting the transition to sustainable commuting among both employees and businesses.

Personal data of individuals participating in the project activities will be collected and used for organizing the aforementioned project activities and for communication within the project.

Personal data will also be used for project-related communication. Information about the project's activities, such as meetings and workshops, will be communicated to the pilot organizations that have provided their contact information to the project operators. Additionally, communication will be conducted through social media and networks.



As part of the project activities, research data will be collected on the conditions affecting the commuting of staff in the participant organizations, commuting practices, employer-provided commuting benefits, the physical conditions of the workplace (e.g., facilities and equipment), well-being aspects related to commuting, and satisfaction and opinions regarding commuting and the employer's opportunities to promote sustainable commuting among employees. This data collection will involve surveys, interviews, and analyses conducted with the employees of the participant organizations, as well as observations carried out within the facilities of the participant organizations.

The resulting research data, which includes personal data, will be analyzed during the project to assess the current state of commuting in the participating organizations, identify measures that encourage changes in commuting modes, and evaluate the effectiveness of these measures. The data will also be used to assess the impact of the project and its activities. The research data will be anonymized by the end of the project. After the project's conclusion, the anonymized research data will be archived as described in this privacy notice. Anonymized research data may be used during or after the project for research, publications, development, and educational purposes.

What data do we collect?

We collect and store the following information from individuals when they register for or participate in project events: name, organization, job title, phone number, email, and dietary requirements. Attendees will be informed about photography or video recording at the event upon arrival. Separate consent will be requested from individuals for the collection, storage, and publication of photographs and video footage in which they can be identified and that are related to the project activities. Screenshots will be taken during remote events to serve as a participant list, which we may use to verify the organization of the event to the project's funder if necessary.

The impact of the trials conducted in participant organizations and the changes in staff commuting will be evaluated using surveys, interviews, and documentation from meetings and workshops. For this research purpose, we will store participants' survey responses, interview responses, and discussions from meetings and workshops. Audio recordings of interviews will be made and transcribed if the interview is recorded. Separate consent will be requested from participant organizations for photography and video recording during observations.

The project receives support from the Net Zero Cities Mission Pilots (Horizon 2020) program. In accordance with the funder's guidelines, the project will collect information from participating organizations for monitoring the project's impact.



On what basis do we process the data?

The legal basis for processing personal data is consent. This means that, for example, when registering for an event organized by the project, the participant gives permission for their information to be added to the participant list.

The processing of special categories of personal data (e.g., health-related information that may be included in survey responses) is based on the explicit consent of the data subject.

Where we collect personal data from

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

To whom is the data transferred?

In the project's activities, personal data is transferred to the following external processors:

- event management services (such as Lyyti or Webropol) which are used to collect and process registrations for events and workshops. The project partners LAB and LUT and the service provider have signed an agreement regarding 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 information, survey and interview responses) is updated and stored on the internal servers of the implementing organizations or in services deemed secure by the implementing organizations, such as OneDrive for Business and Microsoft Teams.

For the transcription of interviews, i.e., converting them into text form, Microsoft Teams or a service provider committed to the secure processing of personal data may be used. The service provider will destroy the received audio recording after the transcription is completed.

The project staff has access to the personal data in the register during the course of the project. For research data, only the project staff has access to data that contains direct identifiers (such as individual-level interview recordings and survey responses).



The research data describes the commuting patterns of the staff within organizations. Anonymized research data can be used by the implementing organization's staff for publications, research, development, and teaching purposes.

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

As a general rule, the collected personal data will not be transferred outside the EU or the European Economic Area. However, when personal data is processed in Microsoft services or other systems of U.S. origin, it is possible that personal data may be transferred to the United States. In such cases, the legal basis for the transfer is the European Commission's adequacy decision in accordance with Article 45 of the General Data Protection Regulation (GDPR), ensuring an adequate level of data protection (Adequacy decision for the EU-US Data Privacy Framework, available at https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Secure storage of collected data

Digital data will be stored on secure servers belonging to the City of Lahti and the co-implementers (LUT University, LAB University of Applied Sciences, and Päijät-Häme Wellbeing Services County), as well as in services deemed secure. Access to the data is restricted to project staff during the project.

The research data generated in the project, once anonymized, can be used for research, teaching, and development purposes related to sustainable mobility, based on the consent given by participants. During the analysis phase, direct identifiers and indirect identifiers sufficient to identify individuals will be removed from the research data. The anonymized data will be archived on the secure servers of the implementing organizations. 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?

The personal data of individuals participating in the project's activities will be retained for communication and contact purposes for the duration of the project, from June 1, 2023, to May 31, 2025 (or until the project officially ends, including any potential extensions).

Project monitoring data, such as participant lists and personal data forms, will be retained and archived in accordance with the funder's guidelines for at least 5 years from the due date of the project's final payment.



Anonymized research data collected during the project will be retained until the manuscripts reporting the research results have been 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 their consent when the processing of personal data is based on consent.

The data subject also has the right to lodge a complaint with the Office of the Data Protection Ombudsman if they believe that the processing of their personal data has violated applicable data protection laws.

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

- a) The right to access their personal data.
- b) The right to rectify their data.
- c) The right to erase their data.
- d) The right to restrict the processing of their data.
- e) The right to transfer their data to another data controller.

If the data subject wishes to exercise their rights under data protection law, they are requested to contact the Data Protection Officer, whose contact details are provided 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
Business ID: 0245904-2
Address: Yliopistonkatu 34, 53850 Lappeenranta
Phone: +358 29 4462111

LAB University of Applied Sciences
Business ID: 2630644-6
Address: Mukkulankatu 19, 15101 Lahti, Finland
Phone: +358 29 4465000

Health and Wellbeing County of Päijät-Häme
Business ID: 3221309-4
Address: Keskussairaalankatu 7, 15850 Lahti
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.

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

Name: Katja Ojala
Organisation: City of Lahti
Address: Harjukatu 31, 15100 Lahti
Phone: +358 44 483 1797
Email: katja.ojala@lahti.fi

Name: Miika Marttila
Organisation: LUT University
Address: Yliopistonkatu 34, 53850 Lappeenranta
Phone: +358 50 355 6489
Email: miika.marttila@lut.fi

Name: Niina Sallinen
Organisation: LAB University of Applied Sciences
Address: Mukkulankatu 19, 15101 Lahti, Finland



Phone: +358 50 436 2386
Email: niina.sallinen@lab.fi

Name: Taru Pietilä
Organisation: Health and Wellbeing County of Päijät-Häme
Address: Keskussairaalankatu 7, 15850 Lahti
Phone: +358 44 482 4272
Email: taru.pietila@paijatha.fi

Project leader in charge

Name: Elina Ojala
Organisation: Environmental Director, City of Lahti
Address: Harjutie 31, 15100 Lahti
Phone: +358444826376
Email: elina.ojala@lahti.fi

Those carrying out the research

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

Data Protection Officers

Name: Asianhallintapäällikkö Tiina Häyrinen
Organisation: City of Lahti
Address: Harjutie 31, 15100 Lahti
Phone: +358 40 183 4334
Email: tietosuoja(at)lahti.fi

Name: Legal Counsel Ilona Saarenpää
Organisation: Lappeenrannan-Lahden teknillinen yliopisto LUT / LAB University of Applied Sciences
Address: PL 20, 53851 Lappeenranta
Phone: +358504301072
Email: tietosuoja@lab.fi, tietosuoja@lut.fi

Name: Tietosuojavastaava Pauliina Saarinen
Organisation: Health and Wellbeing County of Päijät-Häme
Osoite: Keskussairaalankatu 7, 15850 Lahti
Sähköposti: kirjaamo@paijatha.fi

