



to Hoofd DRD
cc CPO, privacycoordinator DRI
from FG en plvFG

subject Smart Survey 2023

date August 11, 2023

rubriek 1

rubriek 2

I have been asked to assess the DPIA concerning the smart perceptions survey 2023. I have only a few comments:

- (1) Location data do not belong to a special category of data. They are widely considered 'sensitive data' though.
- (2) The appendix with variables used in the field test is not part of the document.
- (3) It is not clear to me what the 'in house' measurement of distance traveled means, and whether this meets the requirement of data minimisation (if the distance can be determined at the respondent's side this is preferable to sending co-ordinates to Statistics Netherlands).
- (4) My main concern is the collection of personal data without the intention of using them for (primary) statistics. However, given the goal of the survey, I can see this pass the proportionality and subsidiarity test.

I have no reason to advice negatively on proceeding with carrying out the envisaged data processing.