

CITY OF LOS ANGELES

CALIFORNIA

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SUBJECT: LADOT DATA PROTECTION PRINCIPLES

The City of Los Angeles Department of Transportation (LADOT) works to deliver a safe, livable, and well-run transportation system throughout the region. Our vision is for all people in Los Angeles to have access to safe and affordable transportation choices that treat everyone with dignity and support vibrant, inclusive communities. As we work to achieve our responsibilities of safety, congestion relief, equity, and sustainability, we also have a responsibility to protect individual privacy and promote a transportation system free from discrimination and the exploitation of personal mobility data.

The Mobility Data Specification (MDS)¹ is designed to process vehicle data minimally necessary for our stated goals and to apply strong privacy protections and security protocols. For example, we categorize this data as Confidential under the City of Los Angeles Information Handling Guidelines -- which exempts the data from the California Public Records Act² -- and we apply strong access controls and de-identification measures to the data.

As part of its Dockless Mobility permitting process, the City of Los Angeles requires Mobility Service Providers (Operators) operating on the streets of Los Angeles to comply with the MDS. Such permitting rules set a consistent standard for the transfer, use, and protection of vehicle data from Operators to LADOT.

LADOT will apply the following data protection standards to all data obtained from Operators to carry out the City's and the Department's data protection responsibilities:

- 1) *Data categorization*: LADOT designates raw trip data as Confidential Information under the City of Los Angeles Information Technology Policy Committee (ITPC) Information Handling Guidelines. This long-standing policy for the City of Los Angeles governs the obligations of the City to protect all manners of data under its control. LADOT will withhold this Confidential Information as exempt from release under the California Public Records Act.

¹ <https://github.com/CityOfLosAngeles/mobility-data-specification>

²

https://static1.squarespace.com/static/57c864609f74567457be9b71/t/5bd2165471c10bf711f24edc/1540494932514/Information_Handling_Guidelines.pdf

- 2) *Data minimization*: LADOT will mandate data sets solely to meet the specific operational and safety needs of LADOT objectives in furtherance of its responsibilities and protection of the public right of way.
 - a. *Aggregation, obfuscation, de-identification, and destruction*: Where possible, LADOT will aggregate, de-identify, obfuscate, or destroy raw data where we do not need single vehicle data or where we no longer need it for the management of the public right-of-way.
 - b. Methodologies for aggregation, de-identification, and obfuscation of trip data will rely on industry best practices and will evolve over time as new methodologies emerge.

- 3) *Access limitation*: LADOT will limit access to raw trip data related to vehicles and vehicle trips to what is required for our operational and regulatory needs as established by the City Council.
 - a. Law enforcement and other government agencies, whether local, state, or federal will not have access to raw trip data other than as required by law, such as a court order, subpoena, or other legal process. To be clear, the City will make no data available to law enforcement agencies through this process that is not already available to them from Operators now.
 - b. Similarly, the City will only allow access to raw trip data by contractors under the LADOT Third Party Master Data License Agreement which explicitly limits the use of raw trip data to purposes directed by LADOT and as needed for LADOT's operational and regulatory needs. LADOT will prohibit use of raw trip data for any non-LADOT purposes, including for data monetization or any third party purpose.
 - c. After completion of the Dockless Mobility Pilot, LADOT will create a publicly accessible transparency report discussing the types of third party requests for Dockless Mobility data that LADOT has received and how we have responded to those requests.

- 4) *Security*: The City will enact appropriate administrative, physical, and technical safeguards to properly secure and assure the integrity of data.
 - a. Los Angeles' formal information security program and the comprehensive set of security protections and standards established by the City will govern this data as it does all other city data, including but not limited to security incident and emergency response reporting.³
 - b. The City will conduct ongoing security testing to audit and improve security protections, consistent with the City of Los Angeles' information technology policies and practices.

- 5) *Transparency for the public*: The public deserve a clear description of the data used by LADOT and the ways such data is pertinent to the responsibility of protecting the public right-of-way. To that end, LADOT will publish a list of the data types collected via the MDS and the length of time that data is retained.

³ The current version is *City of Los Angeles Information Security Policy Manual* dated March 8, 2017.

- a. The City of Los Angeles shares certain information with the public to increase transparency, accountability, and customer service and to empower companies, individuals, and non-profit organizations with the ability to harness a vast array of useful information to improve life in our city.
- b. We share data via the City of Los Angeles [Open Data Portal](#). Before we publish any Dockless Mobility data to the Open Data Portal, LADOT will ensure the data is de-identified in accordance with established data protection methodologies.
- c. LADOT will not release any Dockless Mobility data on the Open Data Portal until data de-identification and destruction treatments are implemented.