







# **Information notice**

# **Luxmobil 2025 survey**

### 1. What is the Luxmobil 2025 survey?

The Luxmobil 2025 survey is being carried out on the initiative of the Ministère de la Mobilité et des Travaux publics du Grand-Duché de Luxembourg, hereinafter referred to as "the Ministry". It is necessary for the Ministry to fulfil its mobility planning mission, in particular by gathering indicators on residents' travel behaviour and mobility needs.

The participation of the people selected is essential, whatever their travel habits. It's a unique opportunity for their own experience to be considered in the results of the survey and, ultimately, in future decisions on mobility.

The survey consists of two parts: an initial telephone interview will cover the week's journeys. At the end of this interview, participants will be asked if they agree to be contacted again the following Monday to answer a few questions about their Saturday journeys.

Carrying out this survey involves processing personal data, i.e. processing information relating to identifiable individuals.

#### 2. What are the aims of the Luxmobil 2025 survey?

The 2023-2028 coalition agreement aims to ensure effective planning and evaluation of mobility and transport policies:

- Developing the national and international rail network.
- The development of high service level corridors (CHNS) for buses and optimisation of bus services, particularly in rural areas.
- The development of trams, in particular rapid trams.
- Creating park-and-ride facilities and reducing cross-border car traffic.
- Examining the possibility of widening motorways to include a 3<sup>rd</sup> lane dedicated to buses and carpooling.
- Opportunity analyses for additional train or tram lines.

To meet these challenges, the Luxmobil 2025 mobility survey is essential in order to obtain representative and up-to-date knowledge of the mobility behaviour of Luxembourg residents.









This is all the more true given that since 2017 (the date of the previous Luxmobil survey), population and job growth have remained high in the Grand Duchy, while crises (pandemic, inflation) and substantial improvements in public transport provision (tram, new RGTR network, new CFL offers, free public transport, etc.) have changed, perhaps even overturned, many mobility behaviours (teleworking, popularity of cycling on a daily basis, etc.).

In order to help decision-makers make informed choices and provide solutions to the travel problems encountered by the population, the data collected during this survey will enable better planning and effective evaluation of mobility and transport policies, through:

- The preparation of the next NMP with updated demand data.
- Assessing the impact of transport policies
- Improving understanding of changes in behaviour (COVID, teleworking, cycling, etc.).
- Feeding multimodal traffic models.

#### 3. How were you selected to take part?

Participants are selected by telephone, using randomly dialled numbers: ILRES, the polling institute commissioned by the Ministry to collect the data, will dial telephone numbers that it has generated by computer using the "Random Digit Dialing" technique. This technique involves creating telephone numbers from existing roots, i.e. taking the first allocated digits as published, for example, by the Institut Luxembourgeois de Régulation (ILR) and creating all possible combinations of numbers from the remaining four or six digits.

ILRES will then dial the numbers generated this way and invite the people contacted to take part.

ILRES does not know the identity of the people it calls using this technique. You will find full details of how ILRES generates and dials the numbers it contacts in the notice posted on the <a href="https://ilres.lu/">https://ilres.lu/</a> page, under the "How ILRES S.A. uses your telephone number" tab.

The decision to use a database of generated telephone numbers rather than a telephone directory, the decision to exclude participation "on request", are essential to the quality of the survey, in particular to ensure that the results are representative. A telephone directory only contains a part of the population, and its use would lead to biased results. The same applies to participation based on the registration of interested parties, as the survey would then only take into account the behaviour of people who are aware of the survey and interested in the subject.









#### 4. Who can take part?

Only people called using the methodology explained in the above-mentioned point 3, and sometimes a second person from their household, can take part. In fact, when the persons household contacted includes at least 3 people aged 5 and over, the participation of a second person within the household is desirable.

# 5. Who is the data controller and who is involved in data processing?

The Ministère de la Mobilité et des Travaux publics du Grand-Duché de Luxembourg is the data controller of the processing of the personal data involved in carrying out this survey:

Ministry of Mobility and Public Works of the Grand Duchy of Luxembourg 4, place de l'Europe, L-1499 Luxembourg

https://mmtp.gouvernement.lu/fr.html / Tel: (+352) 247-82478
To contact the Data Protection Officer: tr.dpo@mmtp.etat.lu

In order to carry out the data collection, the Ministry has engaged the services of three data processors, who will process the personal data required for this survey in accordance with the Ministry's instructions and as described in this notice:

- a) The Centre d'études et d'expertise sur les risques, l'environnement, la mobilité et l'aménagement, established at F-69500 Bron, Cité des mobilités, 25, avenue François Mitterrand, hereinafter "CEREMA".
  - As an expert in the methodology chosen by the Ministry for this mobility study (i.e. the EMC<sup>2</sup> methodology), it is responsible for ensuring that the data collection phase of the survey is carried out correctly, in compliance with the methodological requirements. For more information about CEREMA: <a href="https://www.cerema.fr/fr">https://www.cerema.fr/fr</a>
- **b)** The company ILRES S.A., established in L-8070 Bertrange, 41, rue du Puits Romain.
  - ILRES is one of the leading polling institutes in the Grand Duchy of Luxembourg. It has been commissioned by the Ministry to carry out the 7,860 interviews required for this survey. For more information about ILRES: <a href="https://www.ilres.com/">https://www.ilres.com/</a>
- c) The Luxembourg Institute of Socio-Economic Research, established at L-4366 Esch-sur-Alzette, 11, Porte des Sciences, hereinafter referred to as "LISER".









LISER is a public research centre under the supervision of the Luxembourg Ministry of Higher Education and Research. Dedicated to the social sciences, LISER supports public policy and informs civil society, while contributing to the advancement of scientific knowledge in areas relating to living conditions, the labour market, urban development and mobility. As part of this project, it will ensure that the survey methodology is properly adapted to Luxembourg's specific circumstances and that it is fully implemented. For more information about LISER: <a href="https://www.liser.lu/">https://www.liser.lu/</a>

# 6. Which personal data is processed, and for what purposes?

The information processed is the one people taking part in the survey provide in their interviews. This information not only concerns the participants themselves, but also the members of their household:

- Socio-demographic information about participants, their households and all the people in them, so that cross-analyses can be carried out according to the different profiles and types of households.
- Information on the means of transport used by participants' households (number of motorised vehicles, number of bicycles, etc.), so that this can be considered in analyses of mobility behaviour.
- Information about participants' journeys, in order to analyse residents' mobility practices.
- If a second person in the household can take part but is not directly available, the contact details provided by the first participant (surname, first name and telephone number) will be used to call them and invite them to take part.
- If the participant agrees, the interview is recorded so that LISER and CEREMA can listen to it again to check that it has been correctly administered.

The purpose of the processing is to carry out this survey, which is needed to gain a better understanding of travel behaviour and to identify residents' needs and expectations. Analysis of the information from this survey will be essential for planning future actions to improve mobility in the Grand Duchy of Luxembourg.

# 7. What is the legal basis for this processing of personal data?

The processing of personal data involved in this study is lawful insofar as it is necessary for the performance of one of the public interest tasks entrusted to the Ministry (Article 6, first paragraph, point e) of the General Data Protection Regulation - European Regulation (EU) 2016/679, known as the "GDPR").









Indeed, the Luxmobil 2025 survey is necessary in order to carry out the tasks entrusted to the Ministry in accordance with the Government's internal regulations as approved by the Grand Ducal Decree of 27 November 2023, in particular the task of taking stock of needs in terms of general transport policy and planning all aspects of mobility.

Despite this legal basis, the people selected are of course free to refuse to take part, and the only data processed will be that which the participants provide during the telephone interview.

In addition, in order to allow LISER and CEREMA to listen to the interviews and check that ILRES is administering them correctly, each participant will be asked if they agree to the recording of their interview. Only if the participant agrees will the recording be made.

#### 8. Who will have access to the personal data processed?

During the survey collection phase, LISER and CEREMA will have access to the data collected by ILRES as part of their task of checking compliance with the methodology. This involves checking the consistency of data, as well as the correct administration of the questionnaire by the ILRES interviewers, in particular by listening to recorded interviews.

ILRES will use data collection software provided by NIPO Software BV, established at Amsteldijk 166, 1079 LH Amsterdam. This company will process data for the sole purpose of providing access to its data collection software. ILRES will also use the services of a cloud space provider on which data will be stored for the duration of the processing. The service providers used by ILRES are contractually obliged not to use data for their own purposes, as access is only necessary for the maintenance of their services.

The Ministry will receive the data collected by ILRES, but the file will not contain surnames, first names, telephone numbers or other directly identifying data concerning the participants. Nevertheless, given the data requested in the survey questionnaire, it is possible that some of the respondents may be identifiable based on their answers. Such identification remains theoretically possible in certain cases, particularly in view of the data on travel between the workplace and home and the socio-demographic information on respondents and their households. Although the Ministry will not seek to identify anyone and such identification is not necessary for its processing, it will protect the file it receives from ILRES as a personal data file, until such time as it is able to take measures to completely anonymise the data after carrying out the analyses.









Once the collection phase has been completed, the survey data will be analysed in pseudonymised form by the Ministry in order to achieve the project's objectives. The Ministry may also collaborate with external partners, such as research institutes or consultancy firms, to carry out joint analyses for technical and scientific purposes with similar aims and in compliance with the applicable legislation.

#### 9. Is personal data transferred outside the European Union?

The personal data processed will not leave the territory of the European Union.

### 10. How long will personal data be processed?

ILRES will delete all data processed as part of this survey as soon as possible after the end of the survey and delivery of the results file, and no later than 31 December 2025.

Audio recordings of interviews will be deleted no later than two months after their creation.

As indicated above, the file submitted to the Ministry is not completely anonymous, as it cannot be totally ruled out that certain respondents may be identifiable by cross-referencing the data contained therein with each other or with other existing data. All these data are essential to the analyses to be carried out by the Ministry and cannot therefore be aggregated by ILRES. The Ministry will make the file received completely anonymous within 10 years of the end of the survey, i.e. by 31 December 2035 at the latest.

The data will not be made public until the anonymisation process is complete, and only anonymised results will be published.

# 11. What are your rights?

All people whose personal data are processed as part of the Luxmobil 2025 survey may exercise the rights listed below:

- a) Right of access: The right to request information about their processed personal data.
- **b)** Right of rectification: The right to ask for their personal data to be rectified if it is inaccurate.









- c) Right to limit processing: The right to request that processing be restricted, either for the time necessary to verify the accuracy of certain data, or because the processing is unlawful or is no longer necessary.
- **d)** Right to object: The right to object to the processing of their personal data.
- e) Right to lodge a complaint with the supervisory authority: Should they consider that the Ministry is not respecting their rights regarding the processing of their personal data, participants may lodge a complaint with a supervisory authority. For the Grand Duchy of Luxembourg, this supervisory authority is the Commission nationale pour la protection des données (<a href="https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html">https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html</a>).

As the legal basis for the processing is the public interest mission, certain rights do not apply: this is the case for the right to erasure, the right to portability and the right to withdraw consent. If, however, you would like the recording of the interview to be deleted before two months have elapsed since it was made, you can make a request to ILRES as explained below

#### 12. How can you exercise your rights?

You may submit any request relating to your rights listed above to the ILRES Data Protection Officer, either by post to Ilres S.A., 41, rue du Puits Romain, L-8070 Bertrange, or by e-mail to DPO@ilres.com.

Please note, however, that as this data is collected without the respondent's exact identity being recorded, processing this request will require at least the participant's telephone number.

Please also note that ILRES will delete the data from its files as soon as possible after the end of the investigation, i.e. probably before 31<sup>st</sup> December 2025. It is therefore possible that the data will already have been deleted by the time you make your request, in which case ILRES will no longer have the data and the request will become pointless.

The Ministry will not try to identify participants in the file provided by ILRES, and in many cases this will simply not be possible, even with additional information provided by the applicant.









Pursuant to Article 11 of RGPD, the Ministry is not required to retain, obtain or process additional information to identify the data subject for the sole purpose of complying with the said Regulation.

In this context, once ILRES has deleted the data from its files, individuals who so wish may directly contact the Ministry's Data Protection Officer (tr.dpo@mmtp.etat.lu) to exercise their rights as indicated above. If, however, the Ministry is able to demonstrate that it is unable to identify these individuals, these rights are no longer applicable, except where the data subject provides, for the purposes of exercising these rights, additional information that makes it possible to identify him or her. In short, for many participants, the data contained in the file at their disposal will be anonymous, and for others, finding them in the file would require them to communicate their place of residence and place of work at the time of the survey, as well as their socio-demographic data.

In any event, a reply will always be sent as soon as possible to people exercising their rights and, except in special circumstances of which they will then be informed, no later than one month following receipt of their request.