



Information notice

Luxmobil 2025 Cross-border workers Survey

1. What is the Luxmobil 2025 Cross-border workers Survey?

The Luxmobil 2025 Cross-border workers Survey is being carried out on behalf of the Ministry of Mobility and Public Works of the Grand Duchy of Luxembourg, hereinafter referred to as “the Ministry”. It follows the mobility survey conducted among Luxembourg residents. It is necessary for the Ministry to fulfil its mobility planning mission, particularly by collecting indicators on the travel behaviour of cross-border workers and their mobility needs.

The participation of those selected is essential, regardless of their travel habits. This is a unique opportunity for the public to contribute their personal experiences to the survey outcome and, ultimately, to future decisions on mobility.

As part of this survey, it will be necessary to process personal data, i.e. processing information relating to identifiable natural persons.

2. What is the purpose of the Luxmobil 2025 Cross-border workers Survey?

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

- Development of the national and international railway network.
- Development of high-level service corridors (CHNS) for buses and optimisation of the bus services, particularly in rural areas.
- Development of the tram network, particularly the high-speed tram lines.
- Creation of park and ride facilities and the reduction of cross-border car traffic.
- Consideration of the widening of motorways to include a third lane dedicated to buses and carpooling.
- Opportunity analyses of additional train or tram lines.

To meet these challenges, the Luxmobil 2025 Cross-border workers Survey is an essential tool in the collection of representative and up-to-date knowledge on the mobility behaviour of cross-border workers employed in Luxembourg.

This is particularly relevant given that, since 2017 (year of the previous Luxmobil Survey), population and employment growth have remained influential in the Grand Duchy, while crises (pandemic, inflation) and the substantial improvement in public transport (tram, new RGTR network, new CFL (*Société Nationale des Chemins de Fer Luxembourgeois*) incentives,



free public transport, etc.) have changed, perhaps even disrupted, the mobility behaviour of many people (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 cross-border workers, the data collected during this survey will be used to facilitate better planning and a more effective evaluation of mobility and transport policies through the:

- Formulation of the next PNM National Mobility Plan with updated demand data.
- Evaluation of the effects of the transport policies implemented.
- Improved understanding of behavioural changes (COVID, teleworking, bicycle use, etc.).
- Conception of multimodal traffic models.
- Observation of factors determining mobility needs (location of residences, jobs and other points of interest, socio-economic situation of travellers and their ability to use different mobility options).

3. How were you selected to participate?

Participants are selected from the Social Security Centre (Centre commun de la sécurité sociale - CCSS) database. The Government IT Centre (CTIE) has sent you an invitation to participate without passing on your contact details to third parties: neither the ministry nor ILRES have access to your postal address.

4. Who can take part?

Only persons who have received an invitation letter may participate.

5. Who is the personal data controller and who is involved in the process?

The Minister of Mobility and Public Works of the Grand Duchy of 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
You can contact the data protection officer at: tr.dpo@mmtp.etat.lu

To perform the collection of data, the Ministry has engaged the services of three data processors, who will process the personal data necessary for this survey in accordance with its instructions, and in accordance with the description provided in this notice:

- a) The “Centre d’études et d’expertise sur les risques, l’environnement, la mobilité et l’aménagement” (Centre for Studies and Expertise on Risks, the Environment, Mobility and Urban Planning), F-69500 Bron, Cité des Mobilités, 25, avenue François Mitterrand, hereinafter referred to as “CEREMA”.



As an expert in the methodology chosen by the ministry for this mobility study (namely the EMC² methodology), the agency is responsible in particular for ensuring the satisfactory completion of the data collection phase of the survey, in compliance with methodological requirements. More information on CEREMA: <https://www.cerema.fr/fr>

- b) The company ILRES S.A., L-8070 Bertrange, 41, rue du Puits Romain.

ILRES is one of the main polling institutes in the Grand Duchy of Luxembourg. It has been tasked by the Ministry with conducting the 2,240 interviews required for this survey. More information on ILRES: <https://www.ilres.com/>

- c) The Luxembourg Institute of Socio-Economic Research, 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 Ministry of Higher Education and Research of Luxembourg. Dedicated to the social sciences, LISER supports public policies and provides information to civil society while contributing to the advancement of scientific knowledge in areas related to living conditions, the labour market, as well as urban development and mobility. As part of this project, the institute will ensure in particular that the survey methodology is properly adapted to Luxembourg’s specificities and will monitor its perfect implementation. More information on LISER: <https://www.liser.lu/>

6. What personal data will be processed, and for what purpose?

The information processed includes:

- a) Information processed by the CTIE:

- Name, first name, and postal address, used to send you the invitation and, if necessary, a reminder.
- The participation code assigned to you, which is included in your invitation letter: this code is used to ensure that only invited persons register via the online form, and it allows us to distinguish between those who have registered or declined to participate – via this form – and those who did not react after the letter was sent. Only the latter will receive a reminder, with ILRES sending the relevant codes to CTIE.

- b) Information requested during registration via the online form:

- Individual code provided in the invitation letter.
- Agreement to participate or refusal to participate.



- For those who agree to participate:
 - ✓ Telephone number on which ILRES can call them, as well as their surname and/or first name if they have a landline number.
 - ✓ Municipality of residence and whether or not they are employed in Luxembourg: this information is necessary to verify that they are still eligible to be interviewed.
 - ✓ Gender, age group and municipality of place of work in Luxembourg: this information is necessary to manage the sample, which must remain balanced and representative in terms of these criteria.
 - ✓ Where applicable, individual code assigned to a member of your household who has already participated in the survey: if another person in your household has already participated in the survey, ILRES will use this code so as not to ask you questions about your household again, as the answers have already been provided by that other member and linked to their participation code.

c) Information provided during the telephone interview:

This information concerns participants, but also members of their household:

- Socio-demographic information on the participants, their household, and all their household members, to allow cross-analyses based on the different profiles and types of households to be drawn up.
- Information on the means of transport in the participants' household (number of motorised vehicles, number of bicycles, etc.), in order to be able to take this into account in the analyses of mobility behaviour.
- Information on participants' journeys, in order to analyse their mobility habits.
- If the participant consents, the interview is recorded, so that LISER and CEREMA can listen to these interviews again to check that they have been conducted correctly.

The purpose of the processing is to carry out this survey, which is necessary to better understand travel behaviour and to identify the needs and expectations of cross-border workers. The analysis of the information derived from this survey will form an essential part of future planning actions to improve mobility in the Grand Duchy of Luxembourg and the Greater Region.

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

The processing of personal data involved in this study is lawful in that it is necessary for the performance of a task carried out in the public interest entrusted to the Ministry (Article 6,



paragraph 1, point e) of the General Data Protection Regulation - European Regulation (EU) 2016/679, known as the “GDPR”).

Indeed, the Luxmobil 2025 Cross-border workers Survey is necessary in order to carry out the tasks entrusted to the Minister pursuant to Article 1 of the Law of 24 July 2025 on the processing of mobility data. These tasks are also provided for in the Government's internal regulations, as approved by Grand Ducal Decree of 27 November 2023, including more specifically, that of inventorying needs relating to the general transport policy and global mobility planning.

Despite this legal basis, the selected persons are free to refuse to participate.

Furthermore, in order to allow LISER and CEREMA to listen to the interviews and to check that ILRES has conducted them properly, each participant will be asked whether they agree to the recording of their interview. Only where the participant agrees will this recording be made.

8. Who has access to the processed personal data?

During the collection phase of the survey, LISER and CEREMA will have access to the data collected by ILRES as part of their task to monitor compliance with the methodology. For them, this involves checking the consistency of the data, but also the proper administration of the questionnaire by ILRES researchers, in particular by listening to interview recordings.

ILRES will use data collection software provided by NIPO Software BV, Amsteldijk 166, 1079 LH Amsterdam. This company will be involved in data processing for the sole purpose of providing access to its data collection software. ILRES will also use the services of a cloud storage provider on which the data will be stored for the duration of the processing. Any service providers used by ILRES are contractually required not to use this data for their own purposes, access being necessary only for the upkeep of their services.

The Ministry will be given the data collected by ILRES, however it will not receive the file containing first and last names, telephone numbers or other directly identifying data on the participants. However, given the type of data requested in the survey questionnaire, it is possible that some of the respondents may be identifiable based on their answers. This identification remains theoretically possible in certain cases, in particular taking into account data on journeys between the workplace and home and socio-demographic information on the respondents and their household. Although the Ministry will not seek to identify anyone and personal identification is not necessary for its processing, it will protect the file it receives from ILRES as a personal data file until anonymisation is complete following analysis.

Once the collection phase is complete, the survey data will be analysed in pseudonymised form by the Ministry in order to achieve the project 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. Can personal data be transferred outside the European Union territory?

The personal data that is processed will not be transferred outside the European Union territory.

10. How long will the personal data be processed?

ILRES will delete all data processed in connection with this survey as soon as possible after the survey has been completed and the results file has been delivered, and no later than 30 June 2026.

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, because it cannot be entirely ruled out that certain respondents may be identifiable by cross-referencing the data contained therein or with other existing data. All of this data is essential to the analyses to be carried out by the Ministry and therefore cannot be combined by ILRES. The Ministry will make the file it receives completely anonymous within two years of its receipt, i.e. no later than 30 June 2028.

The data shall not be made public until anonymisation is fully effective. Only anonymous results may be published.

11. What are your rights?

All persons whose personal data are processed as part of the Luxmobil 2025 Cross-border workers Survey may exercise the following rights:

- a) Right of access by the data subject: The right to obtain information regarding their personal data that has been processed.
- b) Right to rectification: The right to obtain rectification of their processed personal data when it is inaccurate.
- c) Right to restriction of processing: The right to obtain restriction of processing, either for the period necessary to verify the accuracy of certain data, or because its processing is unlawful or 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 a supervisory authority: In the event that 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 National Commission for Data Protection(<https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html>).
- ✓ For Germany, the authority depends on the states (Land) of residence:
 - For the Saarland: <https://www.datenschutz.saarland.de/online-dienste/beschwerde-kontrollanregung#c2602>.
 - For Rhineland-Palatinate: <https://www.datenschutz.rlp.de/themen/online-services/beschwerdeformular>.
- ✓ For Belgium: <https://www.autoriteprotectiondonnees.be/citoyen/agir/introduire-une-plainte>.

Given that the legal basis for processing is a task of public interest, certain rights do not apply: these are the right to erasure, the right to data portability or the right to withdraw consent. However, if you want the recording of your interview to be deleted before two-month legal requirement, you can submit a request to ILRES as outlined below.

12. How do I exercise my rights?

If you do not wish to participate, please indicate this on the registration form by simply selecting “No” in response to the question asking whether you confirm your participation, after entering the participation code provided in your letter. (if you connect via the QR code, this participation code will already be pre-filled).

Any requests relating to your rights listed above can be made to the ILRES data protection officer, either by post to ILRES S.A., 41, rue du Puits Romain, L-8070 Bertrange, or by email to DPO@ilres.com.

Please note, however, that because the data will have been collected without ILRES recording the respondent's exact identity of the respondent, processing this request will require knowledge of at least the participant's telephone number or participation code.

In addition, ILRES will delete the data from its files as soon as possible after the survey has been completed, which is likely to be before 30 June 2026. It is therefore possible that this data will have already been deleted by the time you make your request, in which case ILRES will no longer have the data, and the request will become moot.

The Ministry will not seek to identify the participants in the file provided to it by ILRES, and in many cases, this identification will be impossible, even with additional information provided by the applicant.

Pursuant to Article 11 of the GDPR, the Ministry shall not be obliged to maintain, acquire or process additional information in order to identify the data subject for the sole purpose of complying with this Regulation.



In this context, after ILRES has deleted the data from its files, persons who wish to do so may contact the Ministry's data protection officer directly (tr.dpo@mmtt.etat.lu) to exercise their rights indicated above. If, however, the Ministry is able to demonstrate that it is unable to identify these persons, these rights are no longer applicable, except where the person concerned provides, for the purposes of exercising these rights, additional information which allows them to be identified. In summary, for many participants, the data in the file will be anonymous, and for others, identifying them from the file would require them to communicate their place of residence, their place of work at the time of the survey, as well as their socio-demographic data.

In any event, a response will always be sent as soon as possible to persons exercising their rights and, unless there are special circumstances of which they will then be informed, no later than one month following receipt of their request.
