



Information notice

Luxmobil- Sunday Survey

1. What is the Luxmobil- Sunday Survey?

The Luxmobil- Sunday Survey is being carried out on the initiative of the Ministry of Mobility and Public Works of the Grand Duchy of 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 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.

During the performance 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- Sunday Survey?

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

- Development of the national and international railway network.
- Development of high-level service corridors (CHNS) for buses and optimisation of the bus service, 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 – Sunday Survey is an essential tool in the collection of representative and up-to-date knowledge on the mobility behaviour of Luxembourg residents.

This is especially 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 population, 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.

3. How were you selected to take part?

Participants are selected by telephone, using randomly dialled numbers: ILRES, the polling institute tasked by the Ministry with the collection of data, will dial the telephone numbers that have been generated by computer using the random digit dialling technique. This technique consists of creating telephone numbers using the existing root digits, i.e. taking the first digits assigned as they are published by the Luxembourg Regulatory Institute (ILR) for example and creating all the possible number combinations with the remaining four to six digits.

ILRES will then dial the numbers generated and invite the people contacted to participate.

In using this technique, it is not possible for ILRES to know the identity of the people it calls. You can find further details on how ILRES generates and dials the numbers it contacts in the online notification on the website <https://ilres.lu/>, under the tab “How ILRES S.A. uses your telephone number”.

The choice to use a database of generated telephone numbers rather than a telephone directory, as well as the decision to exclude participation “on request”, are essential to the quality of the survey, in particular to ensure the representativeness of the results. In fact, a telephone directory only contains a section of the population, and its use would lead to biased results. The same applies to participation based on registration of interested persons, because the survey would then only take into account the behaviour of people aware of this survey and interested in the subject.



4. Who can take part ?

Only people called via the methodology explained in point 3 above and in some cases, a second person from their household, can participate. In the event that the household of the 2 person 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 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

To perform the collection of data, the Ministry has engaged the services of the company ILRES, established in 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 1,300 interviews required for this survey. More information on ILRES: <https://www.ilres.com/>.

The Ministry also intends to engage the services of two further data processors:

- 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 (namely the EMC² methodology), it is intended that it should check the quality of the data collected by ILRES. For more information about CEREMA: <https://www.cerema.fr/fr>

- b) 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 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, it is intended that it should check the quality of the data, taking into account Luxembourg's specificities. More information on LISER: <https://www.liser.lu/>.

All these data processors will process the personal data required for this survey in accordance with the Ministry's instructions and as described in this notice.

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

The information for processing is that which is provided by the persons participating in the survey at the time of their interview(s). This information concerns participants and also members of their household:

- Socio-demographic information on the participants, their household, and all the people who make up their household, 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 residents' mobility habits.
- In the case whereby a second person in the household is able to participate but is not immediately available, their contact details provided by the first participant (first and last names and telephone number), in order to be able to call them and invite them to participate.

The purpose of the processing is to carry out this survey that is necessary to better understand travel behaviour and to identify the needs and expectations of residents. 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.

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 - Sunday 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 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.

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

If the Ministry entrusts them with this task, LISER and CEREMA will have access to the data collected by ILRES as part of their data verification mission. Their role will be to check that the data is consistent.

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. 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 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 31 December 2027.

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 shall make the file it receives completely anonymous within 2 years following the end of the survey, i.e. no later than 31 December 2029.

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

11. What are your rights ?

All people whose personal data are processed as part of the Luxmobil- Sunday Survey may exercise the rights listed below:

- a) Right of access: The right to obtain information regarding their personal data that has been processed.
- b) Right of rectification: The right to obtain rectification of their processed personal data when it is inaccurate.
- c) Right to limit 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 the 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>).

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.

12. How can you exercise these rights?

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 by ILRES without registration of the exact identity of the respondent, processing this request will require knowledge of at least the participant's telephone number.

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 31 December 2027. 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 directly 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.
