

# Navigating the Data Privacy Landscape for Autonomous and Connected Vehicles: Defining Data Privacy Principles

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*This is the third part in a series of advisories on data privacy best practices for autonomous and connected vehicles. To read previous advisories in this series, please visit: [Best Practices](#) and [Documenting Data Collection](#).*

In 2014, leading automakers adopted the Consumer Privacy Protection Principles for vehicle technology and services. These Principles were reviewed again in 2018. Led by the [Alliance for Automotive Innovation](#) (Auto Innovators), these [Consumer Privacy Protection Principles](#) currently define privacy principles for vehicle technologies and services including:

- Voluntary disclosure of the types of data being collected and how the data will be used and shared
- Multiple points of disclosure including in-vehicle displays, web-based registration portals and owner's manuals
- Ability for consumers to review privacy policies prior to purchase
- Opportunity for consumers to grant permission for their data to be used for third-party marketing

Despite the time lapse since the Principles' initial adoption and their applicability to conventional vehicles they, along with industry best practices and current regulatory requirements, can nonetheless be a useful reference for autonomous vehicle companies. In-house counsel at autonomous vehicle companies should ask the following questions to help construct effective data protection and privacy policies that ensure their company's technologies manage access to identifying data:

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- Where possible, can internal and external access to this data be restricted to the technologies required to perform a specific service?
  - Where should the technology use persistent versus randomly assigned identifiers?
  - Can the data be anonymized or de-identified?
  - What degree of control can customers have over what data is collected, stored or shared?
  - When it's time to transfer ownership, which user data should be deleted, as it may be on other personal devices like a laptop?

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