

## TRANSPARENCY NOTICE

Consumer Data Research Centre (CDRC)  
University College London (UCL)  
Department of Geography  
Gower Street  
London WC1E 6BT

UCL Centre Director: Professor Paul Longley [info@cdrc.ac.uk](mailto:info@cdrc.ac.uk)  
UCL Data Protection Officer: [data-protection@ucl.ac.uk](mailto:data-protection@ucl.ac.uk)

As referenced by the CDRC Privacy Notice for CDRC acquired data at  
<https://www.cdrc.ac.uk/privacy-notice-cdrc-acquired-data/>

Data Partner	Local Data Company
UCL Status	Public Authority
Data	SmartStreetSensor Footfall Data, July 2015 to present.
Description	The LDC SmartStreetSensor footfall data produced in partnership with the CDRC includes details of passive WiFi signal probing from a sensor network across Great Britain. These data are used as a proxy for estimating footfall at retail locations. No individually identifiable data are available, but some MAC addresses of devices in the dataset will be fixed, so theoretically could be used to track an individual across time. Additionally, individuals location is available, although there are no details about the individual person themselves.
Lawful Basis for processing personal data	GDPR Article 6(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
Purpose for processing personal data	Data is made available through the Secure Tier of the CDRC service for the purposes of social science research for the benefit of society.
CDRC Service Tier	Secure Tier
Access to data	By application for the purpose of social science research for the benefit of society. Applicants are required to submit a project proposal that is reviewed by the Data Partner and an independent Research Approvals Group to ensure the research is beneficial to society and/or has scientific merit. Following approval users are granted access to the data within one of the CDRC's secure research environments. All Users accessing the data are required to have completed safe researcher training as offered by the UK Data Service or Office for National Statistics. All results from analysis undergo a stringent output checking procedure to ensure there is minimal risk of disclosure before being released from the secure environment to the user.
Data Security	The data are held within the CDRC secure research environment. Access is restricted to users who have an

	approved project proposal, have signed a CDRC User Agreement and completed a safe researcher training course.
Retention period	No deletion date. Data will be held by the CDRC and then archived at the UK Data Archive to allow for longitudinal research studies and to enable research to be recreated.
Transferring data outside the EEA	These data will not be transferred outside of the EEA. Access to this data will be restricted to the CDRC secure environments.
Research Exemptions and Derogations	<p>The CDRC's use and holding of these data are covered under derogations for scientific research and statistical purposes, Article 89 of the GDPR and the appropriate safeguards are in place, specifically:</p> <ul style="list-style-type: none"> <li>- the technical and organisational measures required by GDPR Article 5(1)(e) 'storage limitation' are in place, including access controls and the security provisions above;</li> <li>- measures required by GDPR Article 5(1)(c) 'data minimisation' are in place, including, where the purposes can still be fulfilled, pseudonymisation; where possible, using anonymised data or where the research purposes can be fulfilled by further processing which does not permit or no longer permits the identification of data subjects, then those purposes shall be fulfilled in that manner.</li> <li>- measures to minimise likelihood of substantial damage and distress to individuals in accordance with DPA 2018 Part 2 Chapter 2 (19)(2); and provisions to ensure the processing is not carried out for the purposes of measures or decisions with respect to a particular individual in accordance with DPA 2018 Part 2 Chapter 2 (19)(3).</li> </ul> <p>The CDRC ensure safeguarding requirements are adhered to through the <a href="#">Research Approvals Process</a> whereby CDRC Users are required to provide detail on their planned use of CDRC data, proposed outputs and ethical approval for the work. Our independent review process ensures that the Data Partner(s) in question are aware of how their data will be used and agree to the research and that our independent academic review process ensures that the research has scientific merit and/or is for the benefit of society. Access to CDRC personal data is controlled and analysis undertaken within the secure environment with outputs checked to ensure results are non-disclosive.</p> <p>Article 17 of the GDPR, the right to erasure or the 'right to be forgotten' does not apply as these data are being held and analysed for scientific research, historical research or statistical purposes and subsequently archiving purposes in the public interest where erasure is likely to render impossible or seriously impair the achievement of that processing.</p>