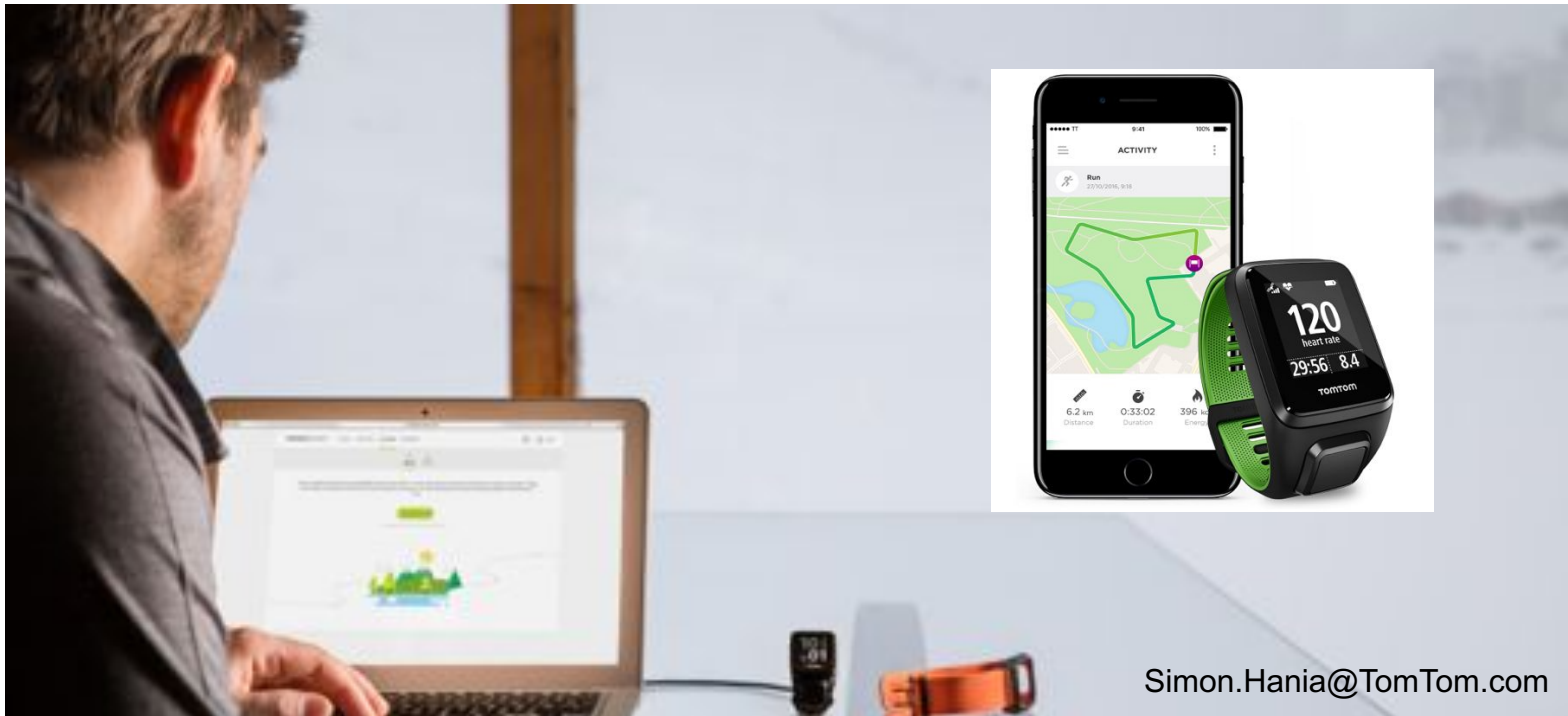




TomTom



Simon.Hania@TomTom.com







## Data portability put to practice

Enabling easy downloads of heaps of data  
can be quite a winding road

# Where are we going today?



-  Demonstrate: Show you how useful “data portability” can be delivered to real people
-  Share: Show you some of our learnings and some nitty gritty topics we addressed
-  Discuss: Table a few teething topics and provoke discussion amongst you
-  Avoid: Teaching GDPR

# How will we get there?



Context

Wearables, watches, work-outs & the web



Easy does it

Share, download, import, export and explaining it



Mechanics

APIs, authentication & authorization



Accountability

Demonstrate that we achieve what GDPR requires



Loose ends

Ten teething topics

# Wearables, watches, work-outs and the web



# Share, download



Work... Search Sheet

Home Insert Page Layout Formulas Data Review >> Share

A1 fx time

time	activityType	lapNumber	distance	speed	calories	lat	long	elevation	heartRate	cycles
0	1	1	0	0	0	52,083591	4,332374	4,3	86	
1	1	1	0	0	0	52,083593	4,33238	4,3	83	
2	1	1	0,28	0,28	0	52,083598	4,33238	4,3	81	
3	1	1	2	1,22	0	52,083606	4,332377	4,3	80	
4	1	1	3,42	1,19	0	52,083616	4,332369	4,3	80	
5	1	1	5,01	1,33	0	52,083629	4,332357	4,4	80	
6	1	1	6,81	1,6	0	52,083644	4,332343	4,4	81	
7	1	1	8,76	1,81	0	52,083662	4,332325	4,4	80	
8	1	1	10,89	2,06	1	52,08368	4,332305	4,4	80	
9	1	1	13,17	2,29	1	52,083701	4,332283	4,4	82	
10	1	1	15,65	2,53	1	52,083723	4,33226	4,5	82	
11	1	1	18,31	2,76	1	52,083746	4,332235	4,5	82	
12	1	1	21,11	2,92	1	52,083771	4,33221	4,5	83	
13	1	1	24,04	3,04	1	52,083796	4,332184	4,6	84	
14	1	1	27,06	3,05	2	52,083822	4,332159	4,6	83	
15	1	1	30,18	3,18	2	52,083847	4,332132	4,6	84	
16	1	1	33,42	3,31	2	52,083871	4,332103	4,6	83	
17	1	1	36,71	3,29	2	52,083891	4,332071	4,7	83	
18	1	1	40	3,18	2	52,083908	4,332036	4,7	83	
19	1	1	43,27	3,05	3	52,08392	4,331996	4,7	83	
20	1	1	46,56	3,07	3	52,083925	4,331953	4,7	86	
21	1	1	49,87	3,09	3	52,083923	4,331908	4,7	89	
22	1	1	53,21	3,12	3	52,083916	4,331863	4,7	90	
23	1	1	56,55	3,07	4	52,083905	4,331821	4,7	91	
24	1	1	59,88	3,03	4	52,083893	4,331784	4,7	93	
25	1	1	63,21	2,97	4	52,083881	4,33175	4,7	94	
26	1	1	66,55	2,92	4	52,083867	4,331717	4,6	91	
27	1	1	69,88	2,88	4	52,083853	4,331682	4,6	90	
28	1	1	73,21	2,87	5	52,083838	4,331647	4,6	91	
29	1	1	76,54	2,87	5	52,083822	4,331609	4,7	90	
30	1	1	79,87	2,89	5	52,083806	4,331571	4,7	89	
31	1	1	83,2	2,92	5	52,083789	4,331532	4,7	88	
32	1	1	86,54	2,96	6	52,083771	4,331491	4,7	88	
33	1	1	89,87	2,99	6	52,083753	4,33145	4,8	90	
34	1	1	93,2	3,03	6	52,083734	4,331408	4,8	91	
35	1	1	96,53	3,09	6	52,083715	4,331366	4,8	91	
36	1	1	99,86	3,16	6	52,083696	4,331323	4,8	90	
37	1	1	103,19	3,24	7	52,083676	4,33128	4,9	89	

Ready Sheet1 100%

TomTom SPORTS

LATEST ACTIVITIES PLANNING PROGRESS

Blog Help Simon

Share

Once shared, anyone with the link can view this activity.

Learn more

Download

fit .csv .xml

Share a link on Twitter

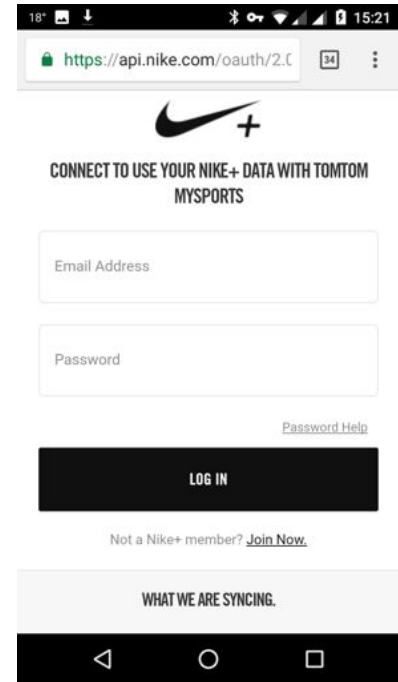
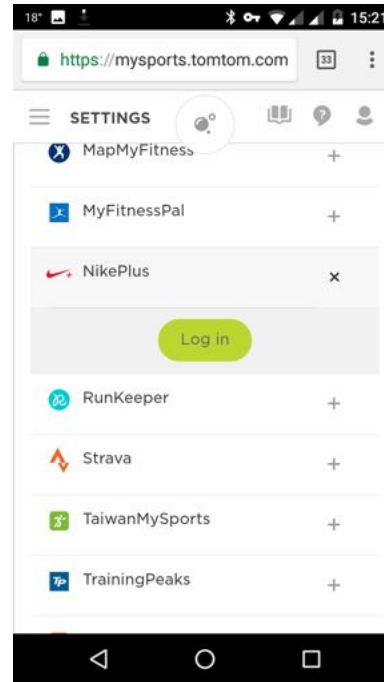
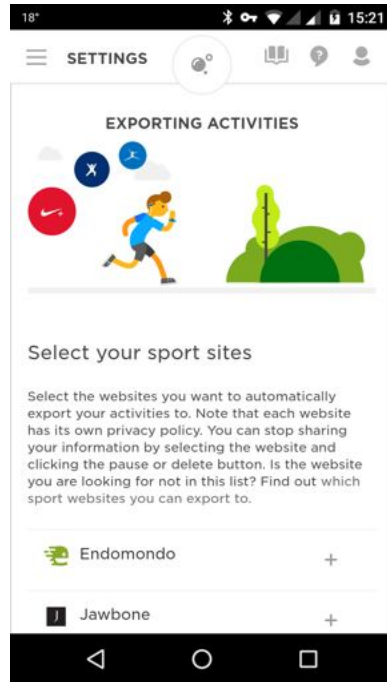
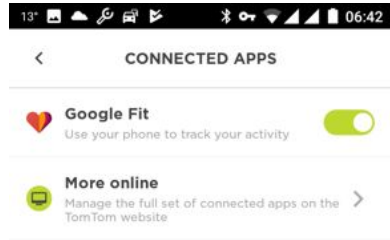
Twitter, Inc. [US] | <https://twitter.com/intent/tweet?hashtags=TomTom,MySports&text=Check+out+my+...>

Share a link with your followers

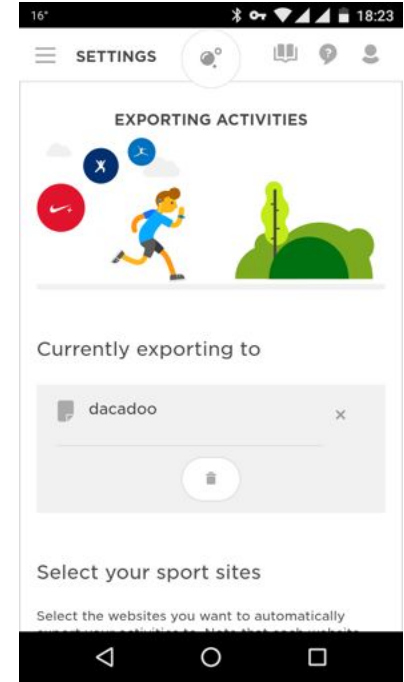
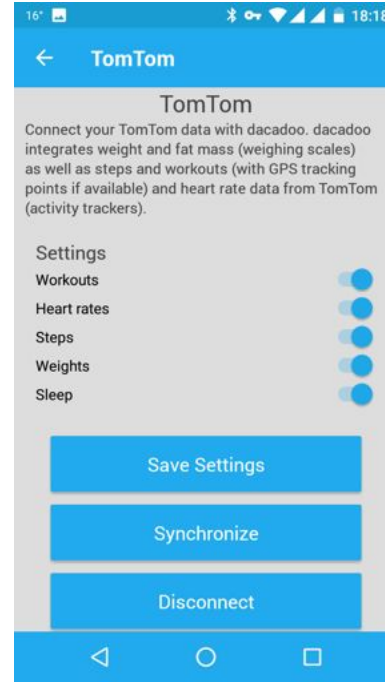
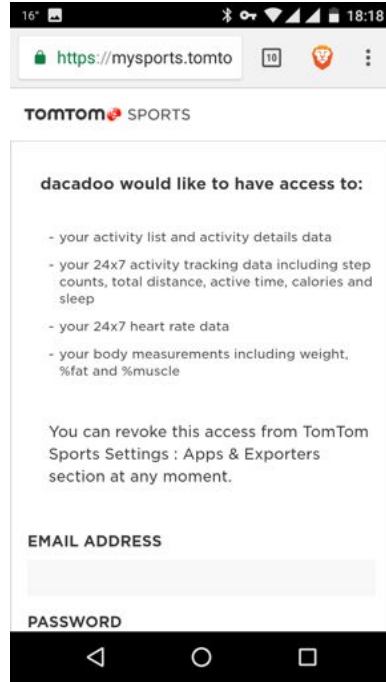
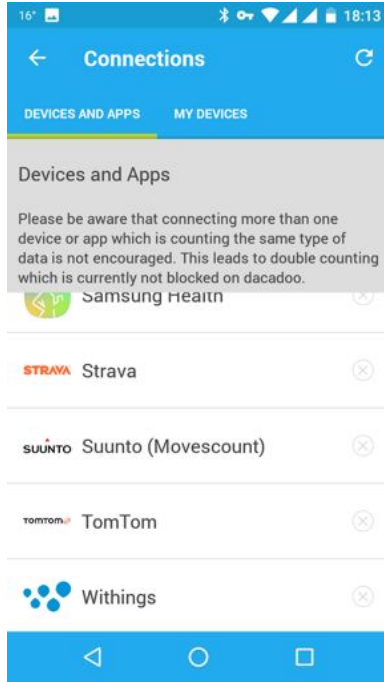
Check out my 16.39km Cycle on 09/10/2016.  
[#TomTom #MySports](https://mysports.tomtom.com/service/webapi/v2/activity/perm_W3tZQDY67xiClkX3VBb727vzboA8Mpowa8Bib0kImzpkLJ77jaE1inU25Y2Qzn3pZia511YqyJBLyXBpw?format=html)

57 Tweet

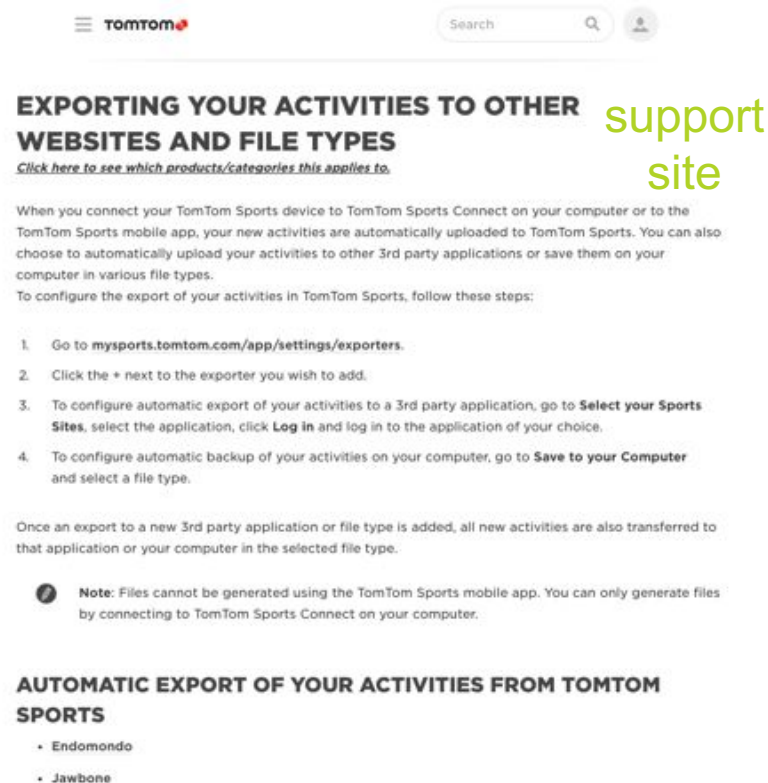
# Import, export – initiated at TomTom



# Export, import – initiated elsewhere



# Explaining it - in multiple ways



**EXPORTING YOUR ACTIVITIES TO OTHER WEBSITES AND FILE TYPES**

*Click here to see which products/categories this applies to.*

When you connect your TomTom Sports device to TomTom Sports Connect on your computer or to the TomTom Sports mobile app, your new activities are automatically uploaded to TomTom Sports. You can also choose to automatically upload your activities to other 3rd party applications or save them on your computer in various file types.

To configure the export of your activities in TomTom Sports, follow these steps:

1. Go to [mysports.tomtom.com/app/settings/exporters](https://mysports.tomtom.com/app/settings/exporters).
2. Click the + next to the exporter you wish to add.
3. To configure automatic export of your activities to a 3rd party application, go to **Select your Sports Sites**, select the application, click **Log in** and log in to the application of your choice.
4. To configure automatic backup of your activities on your computer, go to **Save to your Computer** and select a file type.

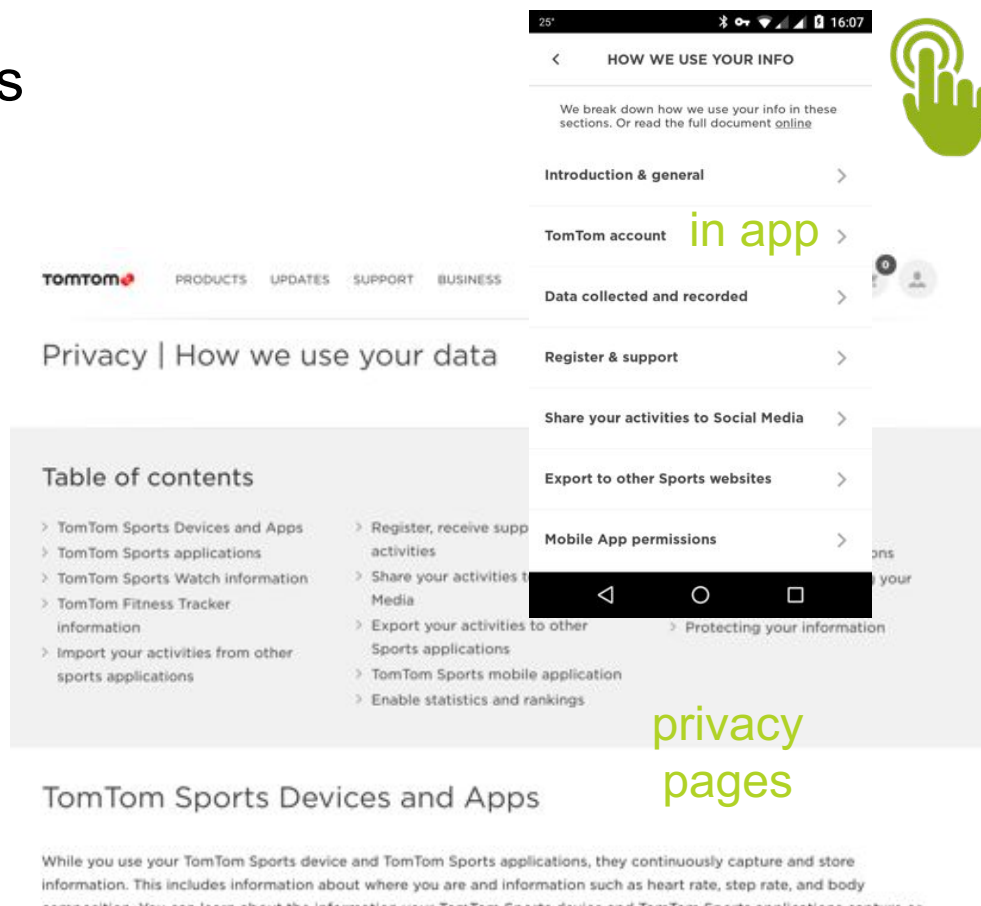
Once an export to a new 3rd party application or file type is added, all new activities are also transferred to that application or your computer in the selected file type.

**Note:** Files cannot be generated using the TomTom Sports mobile app. You can only generate files by connecting to TomTom Sports Connect on your computer.

**AUTOMATIC EXPORT OF YOUR ACTIVITIES FROM TOMTOM SPORTS**

- Endomondo
- Jawbone

support  
site



**HOW WE USE YOUR INFO**

We break down how we use your info in these sections. Or read the full document [online](#)

- Introduction & general
- TomTom account **in app**
- Data collected and recorded
- Register & support
- Share your activities to Social Media
- Export to other Sports websites
- Mobile App permissions

**Table of contents**

- > TomTom Sports Devices and Apps
- > TomTom Sports applications
- > TomTom Sports Watch information
- > TomTom Fitness Tracker information
- > Import your activities from other sports applications
- > Register, receive support activities
- > Share your activities to Social Media
- > Export your activities to other Sports applications
- > TomTom Sports mobile application
- > Enable statistics and rankings
- > Protecting your information

**TomTom Sports Devices and Apps**

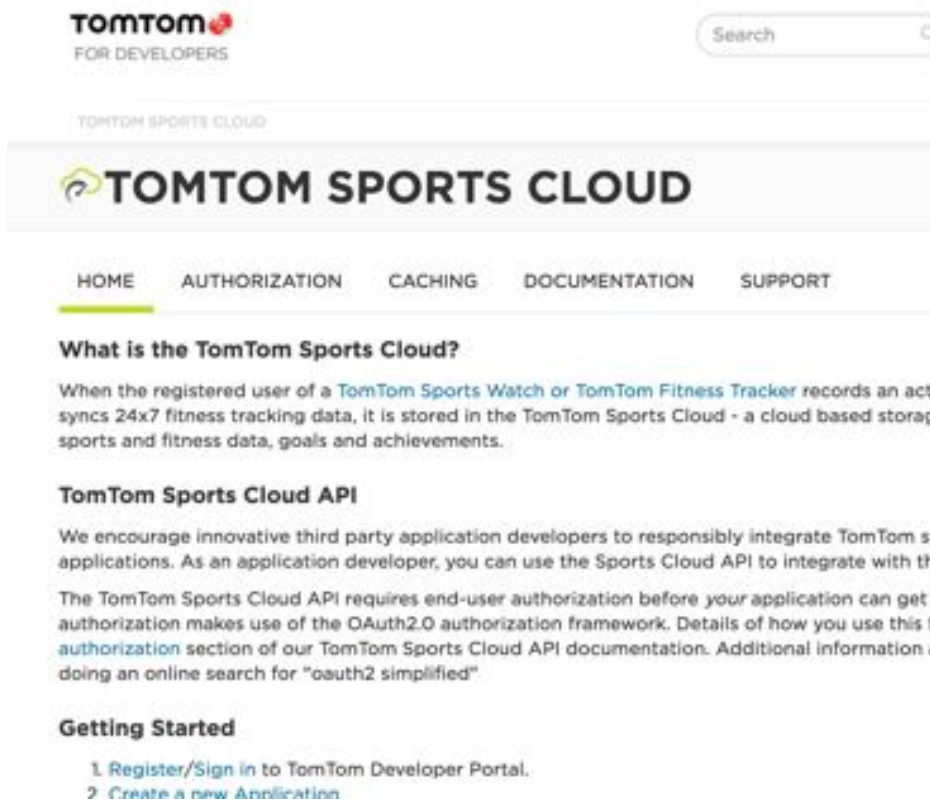
While you use your TomTom Sports device and TomTom Sports applications, they continuously capture and store information. This includes information about where you are and information such as heart rate, step rate, and body composition. You can learn about the information your TomTom Sports device and TomTom Sports applications capture...

privacy  
pages



# Application Program Interfaces

A data protection “fire wall”



**TOMTOM**  
FOR DEVELOPERS

Search

TOMTOM SPORTS CLOUD

## TOMTOM SPORTS CLOUD

HOME AUTHORIZATION CACHING DOCUMENTATION SUPPORT

### What is the TomTom Sports Cloud?

When the registered user of a [TomTom Sports Watch](#) or [TomTom Fitness Tracker](#) records an activity, it syncs 24x7 fitness tracking data, it is stored in the TomTom Sports Cloud - a cloud based storage for sports and fitness data, goals and achievements.

### TomTom Sports Cloud API

We encourage innovative third party application developers to responsibly integrate TomTom sports applications. As an application developer, you can use the Sports Cloud API to integrate with the TomTom Sports Cloud.

The TomTom Sports Cloud API requires end-user authorization before your application can get user data. The authorization makes use of the OAuth2.0 authorization framework. Details of how you use this framework are in the [authorization](#) section of our TomTom Sports Cloud API documentation. Additional information is available in the [FAQ](#) or by doing an online search for "oauth2 simplified".

### Getting Started

- 1 Register/Sign in to TomTom Developer Portal.
- 2 Create a new Application

parties relating to the Application or the Sports Cloud API.

## 12. DATA PROTECTION

12.1 The Parties will observe all provisions of the relevant privacy and data protection laws and regulations, particularly where the violation of such provisions affects the interests of the other Party or the End User. Each Party shall indemnify the other Party against claims resulting from or in connection with the indemnifying Party's non-observance or insufficient observance of the aforementioned provisions.

12.2 The privacy of any and all End Users is of paramount importance to TomTom and its End Users. You and your Application will not be permitted to retrieve any of that End User's data via the TomTom Sports Cloud API unless you have received an explicit authorization from that End User for the Scope indicated by the End User. This authorization may only be solicited using the authorization components of the Sports Cloud API.

12.3 It is your responsibility to ensure that your Application requests the smallest set of Scopes necessary to provide its functionality to the End-User, and that all reasons for requesting these Scopes are made clear to the End-User prior to engaging in the authorization flow with TomTom.

12.4 At the point you request data belonging to an End-User you become responsible and liable on an on-going basis for the decisions regarding purpose and means of subsequent processing, including confidentiality, integrity and availability of that data in transit to your Application and at any point of onward transmission, storage or processing. You must be compliant with all legislation in force across all relevant territories and must not hold TomTom liable for any loss or damages incurred by you or Third Parties as a result of failure to comply with this legislation.

12.5 For your Application to request Data belonging to an End User, where that Data is only visible and accessible to that End-User on TomTom Hardware or TomTom service once he or she has authenticated, your Application must apply a similar request for authorisation. For the avoidance of doubt this means that you must not publicly display or broadcast an End User's data which is in conflict with TomTom's own privacy policies to be found on Privacy Policy.

## 13. TERM AND TERMINATION



## Nitty gritty topics we took care of – focusing on user benefit



- Raw sensor data versus sanitized, smoothed, sensible data
- User request, authentication, authorization, auditing, accounting: giving, withdrawing & conditions for lawful processing
- Authorizing a third party – especially outside EEA
- Noticeable versus “in the back” downloads, imports & exports
- Lifetime of authorization validity – non activity and bad actors
- Security, capacity, availability management & cost charging

# Requirements from GDPR article 20, recital 68 and WP29s view



- Right applies in case of automated means & consent or contract execution
- Receive data provided & transmit to another without hindrance
- Transmit directly to another where technically feasible
- Structured, commonly used, machine readable format
- Interoperable format (as mentioned in recital)
- Consider rights and freedoms of others
- Consider right to erasure independently
- WP29 in opinion WP242 rev.01 key points:
  - Highlight data portability, explain difference with right to access and the relation to erasure
  - “Provided by” to also include “observed by virtue of using a service”
  - Don’t easily use rights and freedoms of others or yourself to deny portability requests
  - Don’t raise a higher bar on identification/authentication/authorization than you already have
  - Act without undue delay, especially when the answer is “no, because...”
  - Processing for data portability is “ancillary to main processing”

# Ten teething topics

we had to take a stance on







1. What is/are the article 6 condition(s) to lawfully process personal data for data portability once requested by a data subject?
2. “Provided to” versus “observed”, “collected from”, “inferred” and “derived”
3. Transient personal data, stored personal data and user expectations
4. Transmit when “technically feasible”: eh, cost of implementation?
5. Without hindrance: does a controller have to bend over backwards on direct transfers or can he impose operational and financial demands on third parties?
6. How to deal with processing which does not require identification?
7. Intellectual Property Rights in relation to “commonly used” formats
8. Interoperable formats don’t automatically result in interoperability: a source of complaints, class actions, PR efforts, enforcement and litigation
9. Rights of others: e.g. owner versus user of a device
10. When does data portability become a data breach and what to do then?



## Where are we going today?



-  **Demonstrate:** Show you how useful “data portability” can be delivered to real people
-  **Share:** Show you some of our learnings and some nitty gritty topics we addressed
-  **Discuss:** Table a few teething topics and provoke discussion amongst you
-  **Avoid:** Teaching GDPR

# Thank you

Any views, gripes, questions?