

ICDPPC Global Privacy and Data Protection Awards

2018

Entry Form

Deadline 29 June 2018

To submit an entry to the ICDPPC Global Privacy and Data Protection Awards please complete and email this form to ExCoSecretariat@icdppc.org no later than 29 June 2018.

Note: ICDPPC member authorities can submit as many entries as they wish but a separate form should be used for each different entry. Please complete the entry in English.

1. Contact details for this entry:

- a. Name and email address of person completing this form:
- b. Name of Data Protection or Privacy Authority: [Information and Privacy Commissioner of Ontario \(IPC\)](#)

2. Eligibility: By submitting this entry I confirm that:

- a. The Authority is a member of the International Conference of Data Protection and Privacy Commissioners.
- b. The initiative described in this entry was undertaken since the last edition.
- c. I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the ICDPPC Secretariat.

3. Please indicate which category or categories you wish to enter (delete those that do not apply; you can enter multiple categories):

- a. **Education and public awareness**
- b. **Accountability**

4. Description of the initiative: SMART CITIES

- a. Please provide a brief summary of the initiative (no more than 75 words):

The IPC has taken a leadership role in ensuring that municipalities are prepared for the emergence of smart city technologies, and their inherent privacy risks. The need for strong privacy protections must be a constant. This was the message our office and privacy protection authorities from across the country recently delivered to the Government of Canada. The IPC also developed guidance to help the public understand how smart cities can affect an individual's privacy.

- b. Please provide a full description of the initiative (no more than 350 words):

Connected technologies promise to help municipalities better manage urban environments and deliver services in more effective and efficient ways. However, many involve the collection and use of large amounts of personal information, which presents new and unique challenges to the protection of privacy.

This year the IPC led other privacy authorities from across Canada in urging the Canadian Government to ensure privacy and security are at the forefront of the Government of Canada's Smart Cities Challenge. The challenge invited communities

from across Canada to submit proposals for projects and compete for up to \$50 Million in funding. Our message to the responsible minister outlined what needs to be done to mitigate the privacy risks during the project approval and development stage. If publically funded support is provided for smart city proposals, we are committed to ensuring it is limited to those that will be carried out in a way that ensures personal privacy is protected. To help achieve this, the IPC, along with its counterparts, offered to support the development of selection criteria and the evaluation of project scoring in this area.

As part of our work on smart cities, we issued a fact sheet to provide a foundation of understanding to the public, help them engage with government leaders in a meaningful way and to explain the solutions available to address the privacy risks associated with smart cities.

The IPC has also undertaken many speaking engagements, describing the privacy risks and explaining the various control measures that are essential to protecting privacy. Through these engagements, we have reached the various players, including city staff, private vendors and the public.

Finally, the IPC has provided support to municipalities launching smart city initiatives that have the potential to impact privacy. We have also engaged with Sidewalk Labs, a Google sister company trying to build a city in Toronto from the “internet up”, which if successful will be the largest smart city initiative in North America.

- c. Please explain why you think the initiative deserves to be recognised by an award (no more than 200 words)

- Ontario’s cities have seen a rise in the launch of smart city initiatives, with injection of federal funding, the arrival of Sidewalk Labs and a general push for innovation given increasing strain on cities.
- We recognized this trend and prioritized this issue for proactive engagement. In just four months:
 - We gained cross-Canada support to lobby the federal government via an open letter, and secured a commitment from the minister that privacy would be an important review criteria
 - This open letter had an impact beyond the Smart City Challenge. Sidewalk Labs was in the process of developing a data governance framework and relied on certain recommendations from the open letter including a commitment to conduct PIAs and TRAs. We continue to engage with Sidewalk Toronto as the project proceeds.
 - Drafted a fact sheet for the public.
 - Attended three smart city conferences/ learning events to study the technologies, and ethical considerations.
 - Delivered eight speeches on smart cities to private sector, public sector, civil society and the public, raising awareness among decision makers.
 - Proactively contacted a municipality regarding a news item describing a smart initiative that raised privacy questions and worked to resolve the issues.

- d. Include a photograph or image if you wish (note this will help illustrate the description of the entry on the ICDPPC website; the image can be pasted into the entry or send as an attachment or a link may be provided): <https://www.ipc.on.ca/wp-content/uploads/2018/04/fs-tech-smart-cities.pdf>

TECHNOLOGY FACT SHEET

Smart Cities and Your Privacy Rights

New technologies promise to help municipalities better manage urban environments and deliver services in a more effective and efficient way. They can help to make communities more liveable, sustainable, and fair. Many involve the collection and use of large amounts of information, including personal information. Cities or municipalities that use these connected technologies are often described as “smart cities.”

This fact sheet was developed to help members of the public understand smart cities and how they can impact an individual’s privacy

The Office of the Information and Privacy Commissioner of Ontario (IPC) provides independent oversight of the *Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)*. This act protects the privacy of personal information by setting rules for its collection, use and disclosure by municipalities and municipal institutions. These rules also give individuals the right to access their own personal information.

The IPC has developed this fact sheet to help the public understand smart cities and how they can impact an individual’s privacy.

WHAT ARE “SMART” CITIES?

Smart cities use technologies that collect data to improve the management and delivery of municipal services, support planning and analysis, and promote innovation within the community. By collecting large amounts of data, often in real-time, municipalities can gain a greater understanding of the quality and effectiveness of their services. For example, commuter traffic flow data can identify congestion



- e. _____
- f. Please provide the most relevant link on the authority’s website to the initiative (if applicable) (The website content does not need to be in English): <https://www.ipc.on.ca/protecting-privacy-in-the-smart-city/>
- g. Please provide any other relevant links that you wish that help explain the initiative or its impact or success (e.g. links to news reports or articles):

<https://www.ipc.on.ca/protecting-privacy-in-the-smart-city/>

<https://www.ipc.on.ca/newsrelease/ontarios-privacy-commissioner-leads-call-for-a-privacy-protective-approach-to-smart-city-projects/>

<https://www.ipc.on.ca/wp-content/uploads/2018/04/smart-city-public-letter-final-en.pdf>

Information and Privacy Commissioner of Ontario	April 24, 2018
Office of the Privacy Commissioner of Canada	The Honourable Amarjeet Sohi Minister of Infrastructure and Communities 180 Kent Street, Suite 1100 Ottawa, ON K1P 0B6
Commission d'accès à l'information du Québec	
Office of the Information and Privacy Commissioner for Nova Scotia	Sent by email
Manitoba Ombudsman	Subject: Smart Cities Challenge
Office of the Information and Privacy Commissioner for British Columbia	Dear Minister:
Office of the Information and Privacy Commissioner of Prince Edward Island	As federal, provincial, and territorial privacy protection authorities, we are writing to urge you to proactively take steps to ensure that privacy and security of personal information are specifically considered in the selection, design, and implementation of the winning proposals in Infrastructure Canada's Smart Cities Challenge, recently launched under the Government of Canada's Impact Canada Initiative.
Office of the Information and Privacy Commissioner of Alberta	We understand that the department has invited communities across Canada, including municipalities, local or regional governments as well as indigenous communities, to develop proposals for "innovative solutions to their most pressing challenges using data and connected technologies." Winning communities will be awarded with prize money to help implement their proposals.
Office of the Information and Privacy Commissioner of Newfoundland and Labrador	We appreciate the potential value of innovative smart city initiatives, such as allowing communities to more effectively address the challenges of urbanization and allocate resources accordingly. We do however urge you to ensure that this initiative, in supporting and encouraging innovation, requires project proposals to directly build in privacy protections. This is especially the case given that finalists from most jurisdictions will be subject to applicable access and privacy laws. In those jurisdictions yet to include municipalities under their access and privacy legislation, the insistence on these protections is even more vital.
Yukon Information and Privacy Commissioner	
Office of the Information and Privacy Commissioner of Nunavut	
Office of the Saskatchewan Information and Privacy Commissioner	Privacy Risks The data that smart technologies collect and use can come from many sources, such as sensors that interact with people or with their personal devices as they go about their daily lives – often without any positive action required on the part of the individual, or even opportunity to opt out.

Smart Cities specific IPC Presentations:

<https://www.ipc.on.ca/wp-content/uploads/2018/06/2018-06-20-its-privacy-and-smart-cities-web.pdf>

https://www.ipc.on.ca/wp-content/uploads/2018/05/2018-05-25-iapp_smartcities-2018-final-web.pdf

<https://www.ipc.on.ca/wp-content/uploads/2017/02/2017-02-27-conference-board-of-canada.pdf>

<https://www.ipc.on.ca/event/rightscon-toronto/>

Presentations that contain Smart Cities material:

<https://www.ipc.on.ca/wp-content/uploads/2017/04/2017-04-25-pres-misa-pim-symposium-sudbury.pdf>

<https://www.ipc.on.ca/presentation/municipal-access-and-privacy-forum-latest-developments-at-the-ipc-2/>

<https://www.ipc.on.ca/presentation/roto-hamilton-latest-developments-at-the-ipc/>

<https://www.ipc.on.ca/presentation/ontario-connections-access-and-privacy-in-ontario-latest-developments-2/>

External and News Materials

https://sidewalktoronto.ca/wp-content/uploads/2018/05/Sidewalk-Toronto-Responsible_Data_Use_Framework_V0.2.pdf

https://sidewalktoronto.ca/wp-content/uploads/2018/05/Sidewalk-Toronto-Responsible_Data_Use_Framework_V0.2.pdf

“Sidewalk Toronto’s Responsible Data Use Policy will build on the strong foundation established by Canadian privacy laws and aim to realize their spirit and content more fulsomely than any other project to date, as well as building on [recent recommendations](#) by federal and provincial Canadian privacy regulators.”

<https://www.thestar.com/news/gta/2018/06/05/soofa-benches-collecting-data-from-cellphones-in-downtown-newmarket.html>

<https://www.cornwallseawaynews.com/news/local/2018/4/18/city-pitches-home-monitoring-system.html>

<https://nowtoronto.com/news/owns-data-toronto-smart-city/>

<https://www.toronto.ca/city-government/accountability-operations-customer-service/city-administration/city-managers-office/key-initiatives/smart-cities-challenge-2/>

<http://business.financialpost.com/technology/sidewalk-labs-to-hold-public-party-to-open-toronto-hq-but-critics-remain-skeptical-of-smart-city-project>

<https://www.thestar.com/news/gta/2018/06/17/curious-minds-drawn-to-sidewalk-torontos-innovative-prototypes-draw-2000.html>