

(English version)

**Question for written answer E-004993/25
to the Commission
Dolors Montserrat (PPE)
(17 December 2025)**

Subject: Data protection implications of the mandatory V16 beacon in Spain

The connected V16 beacon, which will be mandatory for all vehicles in Spain in January 2026, transmits its location when activated and uses a technical identifier associated with the device. The Directorate-General for Traffic (DGT) and the Spanish Data Protection Agency (AEPD) state that the data transmitted are anonymous and do not allow the identification of the driver or vehicle. However, the existence of a unique identifier and the sending of geographical coordinates could, under certain circumstances, constitute personal data within the meaning of Article 4(1) of the General Data Protection Regulation (GDPR), which expressly covers geolocation.

In light of the above:

1. Has the Commission verified whether Spain has carried out a data protection impact assessment (Article 35 GDPR) before introducing a mandatory system incorporating geolocation in a physical device to be purchased by the general public?
2. Does the Commission consider that the mandatory introduction of an integrated eSIM and the absence of unconnected alternatives comply with the principles of minimisation and proportionality set out in Article 5 of the GDPR?

Submitted: 17.12.2025

**Question for written answer E-000006/26
to the Commission
Alvise Pérez (NI)
(5 January 2026)**

Subject: Publication of people's real-time geolocation data under Spain's compulsory V16 system

Spanish legislation requires the use of connected V16 devices to indicate vehicles that have broken down or are stopped on the public highway. The devices also transmit geolocation data to systems managed by the Directorate-General for Traffic.

Real-time location information is publicly available on a web-based map — access is unrestricted and no login is required. As a result, anyone can look up the location of people who find themselves in potentially vulnerable situations.

While national authorities argue that data is 'anonymised', exact and real-time geolocation can constitute personal data when it indirectly enables natural persons to be identified or poses a risk to their safety.

In light of Regulation (EU) 2016/679 (General Data Protection Regulation):

1. Does the Commission believe that a Member State making real-time geolocation information provided under a mandatory system is consistent with the GDPR?
2. Is the mere claim of anonymisation enough, when the precise nature of the data indirectly allows a person to be identified or could generate risks?
3. Would such processing necessarily require a data protection impact assessment and restriction of access strictly to competent authorities? Does the Commission intend to request information from the Spanish authorities regarding the applicable legal basis and safeguards?

Submitted: 5.1.2026

**Question for written answer E-000155/26
to the Commission
Dolors Montserrat (PPE)
(14 January 2026)**

Subject: Reuse of location data from road safety beacons and personal data protection

From 1 January 2026, all vehicles must be equipped with connected signalling beacons (V-16) for use in the event of breakdown or emergency, which transmit accurate location data and time stamps to traffic authorities for road safety purposes. Some of this information, although not enabling the direct identification of drivers, is being reused by third parties through public maps showing the exact location and temporary status of these devices.

Given that location data can constitute personal data when they indirectly enables natural persons to be identified, even without direct identifiers:

1. Does the Commission consider the reuse by third parties of accurate, real-time location data from a mandatory national system to be compatible with the principles of purpose limitation and data minimisation in Regulation (EU) 2016/679, when such data was collected exclusively for the purposes of road safety?
2. Does the Commission plan to provide Spain with guidance or recommendations on the publication of this type of data with a view to avoiding the risks of re-identification or uses incompatible with Articles 7 and 8 of the Charter of Fundamental Rights of the European Union?

Submitted: 14.1.2026

**Joint answer given by Mr McGrath on behalf of the European Commission
(12 March 2026)**

Article 4(1) of the General Data Protection Regulation (GDPR) ⁽¹⁾ provides that location data can be considered personal data when it relates to an identified or identifiable person.

Recital 26 states that, in order to determine whether a natural person is identifiable, account should be taken of all the means reasonably likely to be used.

The Court of Justice of the European Union (CJEU) clarifies that means are not reasonably likely to be used where the risk of identification appears to be insignificant, the identification is prohibited by law or is impossible in practice ⁽²⁾.

To the extent the processing of information from V-16 emergency beacons involves personal data, it can be lawful where a Member State law meets an objective of public interest and is proportionate to the legitimate aim pursued ⁽³⁾.

The Spanish rules mandating the use of the V-16 emergency beacons aim to reduce roadside fatalities and provide quicker response times for stranded motorists ⁽⁴⁾.

Finally, Article 35 mandates a data protection impact assessment (DPIA) if processing poses high risks to individuals, most notably in cases of automated profiling for legal or significant effects, large-scale sensitive data processing, or systematic public surveillance ⁽⁵⁾. A DPIA can be included either in a general legislative impact assessment or concluded separately before the start of the processing ⁽⁶⁾.

⁽¹⁾ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), OJ L 119, 4.5.2016, p. 1-88.

⁽²⁾ Para 82 of Judgment, 04/09/2025, EDPS v SRB (Notion de données à caractère personnel), C-413/23 P.

⁽³⁾ Article 6(3) GDPR.

⁽⁴⁾ <https://road-safety-charter.ec.europa.eu/content/spain-mandate-v-16-emergency-beacons-all-vehicles-2026>.

⁽⁵⁾ More on high risk processing see <https://ec.europa.eu/newsroom/article29/items/611236>.

⁽⁶⁾ Article 35(10).

It is for the national data protection authority or courts to assess whether the conditions of the GDPR are fulfilled, without prejudice to the competences of the Commission as guardian of the Treaties. The Spanish data protection authority considers that the V-16 emergency beacons do not transmit personal data ⁽⁷⁾.

⁽⁷⁾ <https://www.aepd.es/prensa-y-comunicacion/notas-de-prensa/nota-informativa-sobre-baliza-v16-conectada>.