

TfL Ref: FOI-1661-1617

Thank you for your email received by Transport for London (TfL) on 21 November 2016 asking for information about MAC Address Tracking.

Your request has been considered in accordance with the requirements of the Freedom of Information Act and our information access policy. I can confirm we do hold the information you require.

Between Monday 21 November and Monday 19 December 2016 (inclusive), we collected WiFi connection data from mobile devices using the station WiFi at 54 Tube stations in central London <https://tfl.gov.uk/campaign/station-wifi>. We will not use this data to identify individuals or monitor browsing activity. More information about this pilot is available at the dedicated website we have launched for the pilot <https://tfl.gov.uk/corporate/privacy-and-cookies/wifi-data-collection-pilot> and in the press release <https://tfl.gov.uk/info-for/media/press-releases/2016/november/wifi-trial-to-help-give-customers-better-journeys>.

The WiFi pilot is an internal initiative and has been developed by an in-house TfL team using our existing infrastructure. For the pilot we developed our own method and software for collecting data from our the access points. We store the pseudonymised and encrypted MAC addresses, the date and time of the connection, the device connection status and the individual access point they connected to, and therefore the London Underground station and location within a station where the device connected. A high level technical document "WiFi Pilot Data Capture and Storage" is attached. A number of products are available that offer a similar functionality.

We met the Information Commissioner's Office (ICO) to brief them on the proposal in August. I have attached both the paper we sent to the ICO prior to the meeting and the poster that we discussed with them. This poster was in development when we met the ICO and we have since changed some wording whilst maintaining the same approach that we presented to the ICO. The hardware and networks for the assets that enable this WiFi connectivity are supported by contracted external organisations (Fujitsu and Halo). We held a meeting with representatives of these service providers to discuss the technical ability of collecting data using our current infrastructure. No documentation on the project was shared with these organisations and no meeting minutes taken.

Please note that in accordance with TfL's obligations under the Data Protection Act 1998 (DPA) some personal data has been removed, as required by section 40(2) of the FOI Act. This is because disclosure of this personal data would be a breach of the DPA, specifically the first principle of the DPA which requires all processing of personal data to be fair and lawful. It would not be fair to disclose this personal information when the individuals have no expectation it would be disclosed and TfL has not satisfied one of the conditions of Schedule 2 of the Data Protection Act which would make the processing 'fair'.

Additionally, in accordance with the FOI Act, we are not obliged to supply some of the information as it is subject to a statutory exemption to the right of access to information under section 43(2).

In this instance the exemption has been applied as disclosure of pricing information, as well as details regarding our own software development, is likely to negatively affect our commercial interests. The scheme is currently only a pilot and the costs are just indicative, rather than actual, and so disclosure of costs at this stage would negatively affect the procurement process if this is rolled out more widely. Provision of the information would be likely to lead to suppliers making their decision whether to bid, and if so at what price-point, based on information that is not likely to be representative of the true market value. Provision of these costs would hinder our ability to obtain best value for money in any future tendering process.

The use of this exemption is subject to an assessment of the public interest in relation to the disclosure of the information concerned. We recognise the need for openness and transparency by public authorities, but in this instance feel that balance lies in favour of withholding the information you have requested to ensure that we are in the best position possible to obtain best value for money for similar schemes, as well as for any future tender processes that may occur as a result of decisions taken at the conclusion of this pilot.

If this is not the information you are looking for, or if you are unable to access it for some reason, please do not hesitate to contact me.

Please see the attached information sheet for details of your right to appeal as well as information on copyright and what to do if you would like to re-use any of the information we have disclosed.

Yours sincerely

Lee Hill  
Senior FOI Case Officer

**FOI Case Management Team**  
**General Counsel**  
**Transport for London**