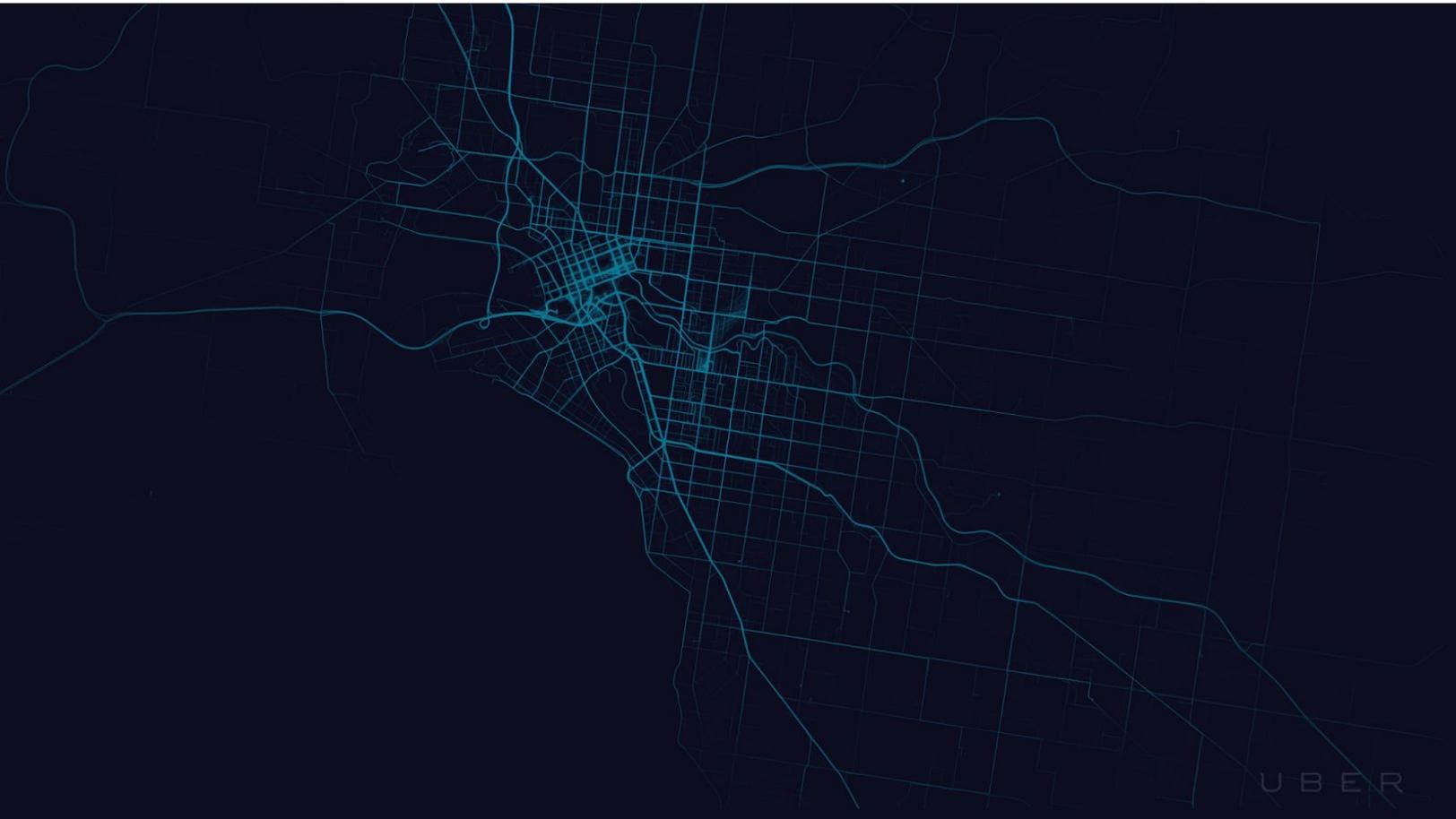# UBER

Submission to the Productivity Commission's Public
Inquiry into Data Availability and Use

December 2016

Introduction

Uber welcomes the opportunity to contribute to the Productivity Commission's Inquiry into Data Availability and Use. Uber shares the Commission's view that harnessing the potential of data created daily represents a key opportunity to drive Australian innovation and economic growth. In addition, we acknowledge that as large data sets become increasingly prevalent, privacy considerations must factor strongly in the ways that personal data is collected, stored, used, and shared.

As outlined in the draft report the exponential growth in volume and importance of data can be largely explained by two trends. The digitalisation of data sets has vastly increased capacity to collate and transfer information. At the same time data analytics tools and techniques have become cheaper and more powerful. These trends have had far-reaching impacts and the discussion around reconciling the various rights and interests in data is an important one.

Uber background

Uber is a technology company that provides a ridesharing platform whereby registered riders are connected with registered driver-partners in over 500 cities worldwide. Ridesharing is a safe, reliable and affordable transport option, using personal vehicles to provide rides. The rider makes a pickup request that is transmitted via the Uber app to nearby driver-partners. When a driver-partner accepts the request, the app tracks the subsequent trip, and facilitates the payment transaction at the conclusion of the ride. The driver-partner pays Uber a service fee for access to the platform.

The increasing importance of data

At Uber we use data to facilitate safe and reliable rides for millions of riders in over 500 cities worldwide. The platform provides thousands of Australians with the flexibility to earn an income around their existing commitments. The data gathered from this undertaking has allowed Uber to expand service offering and quality and also assist policy makers in making informed, evidence-based decisions.

Data and technology will continue to play an increasingly vital role in improving safety outcomes for all road users. Uber's safe driving alerts use GPS, Accelerometer and Gyroscope data already included in smartphones to provide drivers with feedback on their driving. For example, Uber driver-partners receive regular reports on how their driving patterns like harsh braking or acceleration compare to other drivers in their city, and gives suggestions on how to provide smoother, safer rides. In some places, driver-partners may

also receive real time feedback on their speed as well as reminders to keep their phone safely mounted based off this data.

Initiatives such as UberPOOL can pair two riders headed in the same direction thereby reducing the cost of the trip and filling otherwise unutilised seats. UberPOOL is available in over 30 cities around the world and 250 million trips have been taken. UberPOOL currently accounts for more than 20 per cent of all trips taken on the Uber platform where available

Despite funding and interest from policymakers for decades, a lack of adequate technology and associated data has prevented widespread uptake of carpooling services. Data collected from ridesharing about drivers and riders and the directions they are heading has finally made this a reality with service such as uberPOOL. This has far reaching benefits for consumers, including improving urban mobility and affordability, as well as broader positive externalities such as reduced congestion and emissions.

In line with our mission to expand transport options for all members of the community, Uber has partnered with the Australian Network on Disability to offer assisted rides for people with higher accessibility needs. Using data from our two-way rider/driver feedback system, experienced and high ranking driver-partners are invited to an UberASSIST training evening where they learn practical skills around disability awareness. UberASSIST driver-partners are then able to provide services tailored to people living with a wide range of disabilities - maximising their independence and integration into the community.

Uber has partnered with a number of cities to safely and securely make use of trip data on a large aggregated scale to add value to cities and inform policy makers. In Australia, Uber has recently partnered with Infrastructure Partnerships Australia, to create a 'journey time' metric using aggregated and de-identified trip data.[1] The IPA transport metric provides unparalleled insight into the traffic conditions and stress on the transportation networks of Australia's four biggest cities. These insights have contributed to discussions around important city-shaping infrastructure, allowing policy makers to better utilize our scarce resources.

Ensuring data protection and access
Uber's ability to continually improve our service and provide valuable information to policy makers depends on riders and drivers trusting our technology. Internally, access to Uber's data is subject to strict policies that prohibit all employees at every level from accessing a rider or driver's data except for a limited set of legitimate business purposes.[2]

---

[1] https://newsroom.uber.com/australia/uber-ipa-commute/
[2] https://newsroom.uber.com/ubers-data-privacy-policy/

Uber invests heavily in data encryption and other security measures to keep this data safe and secure. This includes experienced internal security teams that extensively test our products to find and fix software vulnerabilities before they can be exploited. Additionally, credit card data is treated in line with industry best practice[3]: Uber does not to store cardholder data but rather only stores encrypted or tokenized hashes of cardholder data that cannot be reversed on any systems owned or managed by Uber*.

Significant effort is also placed on ensuring individuals using the Uber platform have necessary access and control over their own personal data. Riders and drivers using the Uber platform are able to make corrections to account information at any time through the application or by logging in online. In addition, anyone using the platform can choose to have their accounts and associated personal data deleted.

Balancing the benefits and costs of data availability and use
The draft report explores a series of questions in relation to the potential for the release of private data to be standardised or regulated to promote greater availability. At Uber we pride ourselves on data driven initiatives that improve not only the consumer experience, but the mobility experience for all road users. These initiatives are indicative of the strong incentives that exist for private companies to maintain public trust and confidence by leveraging data analytics for the social good.

There are often competing interests at play when considering any given data set. These interests may include privacy, access, commercial and the public good. Weighing up these claims will yield different outcomes depending on the particular data set. It is therefore important to consider the specific data in question and the precise purpose for which it is being sought before discussing the extent to which greater data availability is desirable.

For example highly granular trip data including pickup and drop-off information poses a particular risk both from a privacy and commercial perspective. Even aggregated and de-identified trip information implicates privacy concerns as a motivated observer can de-anonymize that data.[4] Our customers place a significant amount of trust in Uber when providing their personal information and subsequently expect us to protect it judiciously.

As the draft report rightly points out, data and associated collection methods often represent a significant business asset. When this data is collected by a private company under competitive conditions, the presumption should hold that a commercial

---

[3] The Payment Card Industry Data Security Standard
[4] https://www.fastcompany.com/3036573/fast-feed/nyc-taxi-data-blunder-reveals-which-celebs-dont-tip-and-who-frequents-strip-clubs

arrangement is necessary before that data is made available.[5] As outlined above, even aggregated data can be commercially sensitive, and data shared with Government may be vulnerable to Freedom of Information and public records access requests. As a result, there is a concern that the mechanisms designed to mitigate this risk may not be adequate.

A further concern is that that mandatory data sharing could undermine the commercial incentives that drive business innovation. This is particularly true if there is a real or perceived risk that competitors may gain access to that information.

Conclusion

The rapid growth in data volume and quality is an important opportunity to drive economic opportunity and innovation. This is already prevalent across a range of initiatives in point to point transport that not only improve services but also assist in Government decision making.

To ensure that data driven innovation can continue, recognising and protecting information rights and interests is critical. This includes ensuring personal data is collected, stored and used in a manner that protects privacy. In addition, assurances that commercially sensitive information required to deliver such innovations is not undermined.

---

[5] Excluding relevant privacy legislation and individual access considerations.