



## Strathclyde Partnership for Transport

### Privacy Notice - Subway Smartcard

#### Who we are/the service

Strathclyde Partnership for Transport (“**SPT**”) is, in terms of the Transport (Scotland) Act 2005, the Regional Transport Partnership (“**RTP**”) for the west of Scotland, covering 12 local council areas and has its main office at 131 St Vincent Street, Glasgow, G2 5JF.

SPT owns and operates the Glasgow Subway.

A Smartcard is a form of electronic ticket that stores your entitlement to travel on public transport. Smartcards are re-usable and can be loaded with season tickets, as well as Pay As You Go credit (“**Subway travel**”).

SPT issues two types of Smartcards for Subway travel – anonymous Smartcards which can be purchased at Subway stations without providing any personal data, and personalised Smartcards which you register for and provide various items of personal data.

This Privacy Notice explains how SPT collects and uses your personal data in relation to your personalised Smartcard and your account on the Subway smart ticketing website ([smart.spt.co.uk](http://smart.spt.co.uk))

#### Personal data we hold

- Name
- Address
- E-mail address
- Date of birth
- Telephone number(s)
- Employment status (optional)
- Photograph
- Location of ticket purchase and usage

#### How we obtain your personal data

You provided the above data when you registered for a Smartcard online via the Subway smart ticketing website (“**Smartcard site**”), or submitted a paper application to SPT.

SPT obtained your online data from Unicard Limited (“**Unicard**”), who host the Smartcard site on SPT’s behalf. Unicard collects and stores the data you submitted and provides SPT with access to this information.

Until September 2025, the site was hosted by Nevis Technologies Limited. At that time all existing data was transferred to Unicard who took over the service.

#### The purpose of processing your personal data

This data is used by SPT for the following purposes:

- to approve your application for a personalised Smartcard
- to administer your customer Smartcard account
- to make your online purchase available for Subway travel

- to send you marketing information related to your Smartcard, where you have agreed
- for research and statistical analysis
- for the prevention of fraud

## The legal basis for using your personal data

We process your personal data lawfully and fairly in accordance with data protection legislation.

Specifically, the following legal bases apply to the processing of the data you have provided:

- Consent (where you have opted in for marketing – over 16s only)
- Contract
- SPT's Public Task

## How we store your personal data/keep it secure

SPT is committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we collect from you.

Where SPT engages third parties to process personal data on our behalf, they do so on the basis of clear written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measure to ensure the security of the data.

## The length of time we keep your personal data

SPT will retain your data for as long as it is necessary, reasonable and proportionate to do so in order to provide you with this service, and in line with our retention policies. Your personal data will be securely destroyed when no longer required by SPT or when requested by you. Data relating to inactive accounts will be removed after two years without any activity.

## Sharing your personal data/Overseas processing

All Subway smartcard customer data is held within the UK.

Unicard hosts the Subway smart ticketing website (smart.spt.co.uk) on SPT's behalf. In the course of providing this service to SPT, Unicard is required to share with SPT the data you have provided via the site.

Unicard also requires to share your data with a third party company (Euclid Limited, **"Euclid"**) who create and issue your personalised smartcard.

Network Merchants, LLC (**"NMI"**) is the payment processor used on the Subway smart ticketing website (smart.spt.co.uk). In the course of providing payment processing services to SPT, NMI is required to collect and process your financial (card payment) information in order to fulfil your Subway Smartcard ticket purchase.

NMI shares the personal data below with SPT:

- the name on your payment card;
- the address details associated to your payment card;
- the first six and last four digits on your payment card; and
- the expiry date on your payment card.

Unicard, Euclid and NMI have their own Privacy notice and we would urge you to review this before submitting personal data.

SPT will not share your personal data with any other third parties.

SPT may also share your personal data for marketing and research purposes from time to time and, if applicable, third party information related to the activity undertaken will be provided at the time.

SPT may share your personal data in certain emergency situations, or with the police or other law enforcement agencies, in relation to specific investigations/prosecutions.

## **Your information rights**

Your information rights include:

- Your right of access;
- Your right to rectification;
- Your right to erasure, in certain circumstances;
- Your right to restriction of processing, in certain circumstances;
- Your right to data portability, in certain circumstances;
- Your right to object to processing, in certain circumstances; and
- Your right relating to automated decision making.

If you make a request, we have one month to respond to you.

If you wish to exercise any of your information rights, please contact [infogov@spt.co.uk](mailto:infogov@spt.co.uk) or see SPT's Data Protection page (see [www.spt.co.uk/dataprotection](http://www.spt.co.uk/dataprotection)) for more information on how to do this.

## **How to contact us**

The Data Protection Officer for SPT:

Valerie Davidson  
Chief Executive  
Strathclyde Partnership for Transport  
131 St Vincent Street  
Glasgow  
G2 5JF

Telephone: 0141 333 3298

E-mail: [info.gov@spt.co.uk](mailto:info.gov@spt.co.uk)

## **Complaints to the Information Commissioner**

You can complain to the ICO if you are unhappy with how we have used your data. The ICO's contact details are:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Web site: <https://ico.org.uk/>

### **Changes to this notice**

SPT may update this Privacy Notice from time to time and will publish an up to date copy of the Privacy Notice here. This Notice is effective from September 2025.