

Strathclyde Partnership for Transport

Privacy Notice - ZoneCard Online

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 is administrator of the ZoneCard ticketing arrangement, and SPT undertakes this role on behalf of the public transport operators who accept ZoneCard tickets ("**ZoneCard Participating Operators**").

As a ZoneCard holder, you can renew your ZoneCard via our secure ZoneCard Online site. Daytripper tickets can also be ordered on the ZoneCard online site.

This Privacy Notice explains how SPT collects and uses your personal data in relation to the ZoneCard Online site.

Personal data we hold

- Name
- Address
- E-mail address
- Telephone number(s)
- ZoneCard ID
- Payment information
- ZoneCard Online site usage data

How we obtain your personal data

You provided the above data when you renewed your ZoneCard or purchased a Daytripper ticket via our ZoneCard Online site at <u>https://zonecard.online/</u>.

SPT obtained your data from Squarespace Ireland Limited ("**Squarespace**") who host the ZoneCard Online site on SPT's behalf. Squarespace collects and stores the data you submitted to the ZoneCard Online site and provides this to SPT.

The purpose of processing your personal data

This data enables SPT to:

- process payment and issue your ticket
- analyse usage of the ZoneCard Online site
- improve the ZoneCard Online service.

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:

- 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.

Sharing your personal data

Squarespace hosts the ZoneCard Online site on SPT's behalf. In the course of providing this service to SPT, Squarespace is required to share with SPT the data that you provide via the site.

Stripe Inc. ("**Stripe**") is the payment processor used in the ZoneCard online site. In the course of providing payment processing services to SPT, Stripe is required to process your payment information in order to fulfil your ZoneCard Online order. Stripe shares the information below with SPT:

- your name
- your address
- your e-mail address
- the last four digits on your payment card
- the expiry date on your payment card

SPT will not require to share your personal data in relation to your Zonecard Online order with any other third party.

Squarespace and Stripe have their own Privacy Notices (see web links below), and we would urge you to review these before submitting personal data.

https://www.squarespace.com/privacy

https://stripe.com/gb/privacy

Overseas processing

The data you provide in connection with the ZoneCard Online site may be processed in the USA.

Whether your data is processed in a country within the UK, European Economic Area or the USA, any such processing will be subject to appropriate contractual safeguards and carried out in accordance with UK and EU privacy and data protection legislation.

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 <u>infogov@spt.co.uk</u> or see SPT's Data Protection page (see <u>www.spt.co.uk/dataprotection</u>) for more information on how to do this.

How to contact us

The Data Protection Officer for SPT:

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

Telephone: 0141 333 3298

E-mail: 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: <u>https://ico.org.uk/</u>

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 April 2021.