



Privacy policy

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P2	Web site version	30/04/20018	Mark Horide	
P3	Mobile app use	14/06/2019	Mark Horide	
P4	Update EU withdrawal update	12/03/2021	Mark Horide	
P5	Update for to add legal entity, trading names and usage	06/05/2026	Mark Horide	

Introduction

Plymouth Citybus Ltd, Deal Top Ltd (Trading as Dartline Coaches), Go Cornwall Bus & Go-Southwest and (“we”/“us”/“our”) is committed to protecting the privacy and security of the personal information of our directors, employees, workers and contractors (“you”/“your”).

This Notice describes how we collect and use personal information about you before, during and after your working relationship with us, in accordance with our obligations under Data Protection Law (and specifically the Retained Regulation (EU) 2016/679 as it forms part of the law by virtue of section 3 of the European Union (Withdrawal) Act 2018, (the “UK GDPR”) and the Data Protection Act 2018 (**GDPR**)). References in this Notice to “employment” and “employment contract” shall be taken to include the engagement of persons under a contract for services.

It is important that you read this notice, together with our Data Protection Policy and any other privacy notice we may provide to you, or make available to you, from time to time or on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. used lawfully, fairly and in a transparent way;
2. collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
3. relevant to the purposes we have told you about and limited only to those purposes;
4. accurate and kept up to date;
5. kept only as long as necessary for the purposes we have told you about; and
6. kept securely.

This Privacy Policy explains:

- What personal data we collect from you when you use our websites, WIFI, smartcards, apps, visit our Travel shop or EV Charging stations, contact us or use our services.
- How we will collect and use that information;
- How we keep information secure; and
- How you can contact us if you wish to exercise any of your rights in relation to the information or make a complaint.

Controllers

For the purposes of the Data Protection Act 2018, the data controllers are:

Plymouth City Bus Ltd

Registered Address – 55 Degrees North, Pilgrim Street, Newcastle Upon Tyne, NE1 6BL

Our Data Protection Manager is Mark Horide – mark.horide@plymouthbus.co.uk or
1 Milehouse Road, Plymouth, PL3 4AA

You can contact the group Data Protection Officer as follows:

In writing to, The Go-Ahead Group Limited, 55 Degrees North, Pilgrim Street, Newcastle Upon Tyne, NE1 6BL or by email to data.protection@go-ahead.com.

More information about the Data Protection Act can be found on the Information Commissioners Website <https://ico.org.uk/>

The Information Commissioner is our regulator for data protection matters.

Information we may collect from you

We may collect and process information about you when you: buy tickets, travel on our services; visit our bus stations, depots or EV charging Stations; use our website, smartcards, apps or WIFI; buy a product from us or make a sales enquiry; contact Customer Service Travel Advisors and Travel Shop Associates, enter a competition or sign up to receive updates or marketing.

We collect information such as your contact details, ticket purchases, bus stops visited (for example for charging the correct fares on smart cards), payment and refund details. We may require additional details for some services, such as photographs for ID, or your age for age restricted tickets. This information is generally provided by you.

Sometimes we obtain details from third parties, for example if we have taken over a contract/bus company, in order to provide some ticket types or a complaint is passed to us from another operator.

How we use your information

We will only use the information you provide as permitted by the Data Protection Law. Depending on how you contact us, use our services, the consent you have given, our legitimate interests, or legal obligations we may have, this will include:

- **To provide you with the service** (Things like carrying out our obligations arising from any contracts- selling tickets, making and taking payments. We mostly rely on the legal ground of contractual performance to process your data, but sometimes the data is also used for our legitimate interests of customer service, health and safety, improving our services and other legal obligations, like providing information to our regulators)
- **To provide you with details of our services and information about travelling, and customer service** (this is based on our legitimate interests, to run bus and associated services. Sometimes it is part of our contract or our other legal obligations)
- **To provide you with details of promotions and offers** which we feel may interest you; (this is based on our legitimate interests to try and sell more bus tickets when you have given consent for us to contact you and you have an absolute right to ask us to stop sending marketing emails/SMS). If you use one of our apps, information about app notifications is contained within the App and push notifications can be controlled via the App and your mobile device. We use information such as the type of tickets you buy and bus stops you use to send relevant communications.
- **To run our services and improve them** (We believe in investing in our services, not just to benefit passengers but also the wider community, environment, and economy. There are lots of activities we do to achieve this, some are administrative and we also do things like monitoring passenger numbers, and popular bus stops, improving technology to help plan journeys- make money, run our services safely and be a good employer- we call these our legitimate interests. Some of these things are also covered in our legal obligations, not just to customers, but under Local Authority contracts, the Department for Transport or Regulators. Some data is also shared in order to run interoperable services for more than one bus company.
 - For your safety and security.
 - For fraud and crime prevention.
 - To enhance your experience of our website, as described in our cookie policy.
 - To run competitions

We are part of a Group of Companies and share administrative services and support. Your data may therefore be shared with them. We may also be required to pass certain customer data to a successor business, local authority or Department of Transport.

Our Legitimate Interests

Running our business and Group businesses, (in a safe and socially and environmentally responsible manner, efficiently, to provide sustainable and high quality, locally focused

passenger transport services, improve and expand our services, be a leading employer in the transport sector, investing in and developing our colleagues, operating with financial discipline to provide shareholder value, provide and improve customer services)

Sharing or disclosure of your information

We will only share or disclose your information as set out in this Policy or in accordance with Data Protection Law and will obtain your consent where we are required to do so. We will only use third parties to process information where we are satisfied that they comply with these standards and can keep your data secure. We may share or disclose information for the following reasons:

- We use data processors to provide or assist with some of our services. Where we do so, they must agree to strict contractual terms and to keep your data secure.
- Where we share data across our Group Companies, this is only in accordance with a written data sharing agreement.
- To operate interoperable services- this includes use of some shared systems and processors.
- To respond to your complaints or administer requests you have made, either to us or another regulatory body, ADR or appeals service, or local authorities and contract partners;
- To process payment card transactions;
- To comply with requests from the police or other law enforcement agencies for the purposes of crime prevention or detection. These are dealt with on a case-by-case basis, to ensure that any disclosure is lawful;
- To comply with other legal obligations for example, relating to crime and taxation purposes or regulatory activity;
- To protect our legitimate business interests, for example, for fraud prevention or revenue protection; and
- If you have agreed to receive information for competition, promotion, survey or research purposes, we may share your contact details with a limited number of parties, but only for the reasons you have agreed to in the terms and conditions of the purpose.
- Where you have consented, to share with other members of the Go-Ahead Group Limited (registered in England, company number 02100855) ("Go Ahead"), of which we are a member, where Go-Ahead has any services, promotions and offers which we feel may interest you. Details of other members of Go-Ahead can be found here.
- We have a policy in place for one off sharing of data, such as a request from an insurance company.

You can find out more below about the information we collect and how we use, share or disclose it.

Types of Information we collect

CCTV

Camera systems we operate

Our CCTV is used to capture, record and monitor sound and images of what takes place at our bus depots and on the inside and outside of our buses in real time. We may also use CCTV at our EV charging stations.

Cameras can be fixed or set to scan an area. In some circumstances, they can be viewed remotely by CCTV Administrators.

Why we operate CCTV cameras

We operate CCTV for the following purposes:

- Health and safety of employees, passengers and other members of the public;
- Management legitimate interest.
- Prevention and detection of crime and anti-social behaviour.
- Improve the customer service we provide.
- Detection of fraudulent use of travel schemes.

Camera locations

We operate cameras at the bus station, depots we manage and on most of the buses that we operate.

Length of time CCTV footage is kept

CCTV footage at bus stations, depots and on the bus can be stored for a **maximum** of 31 days from the time of recording. The CCTV storage capacity on buses is dependent on the number of hours the bus is in operation and the size of hard drive, therefore footage is retained for an average of 7-21 days before it is overwritten. The CCTV footage on buses & Premises is recorded over on a continual basis.

How to access your CCTV personal data

You can request copies of images or footage of yourself by making a subject access request.

Disclosing personal data to the police

At our discretion, we may disclose personal data in response to valid requests from the police and other statutory law enforcement agencies.

Before we authorise any disclosure, the police have to demonstrate that the personal data is necessary to assist them in the prevention or detection of a specific crime, or in the apprehension or prosecution of an offender.

Requests from the police are dealt with on a case-by-case basis to ensure that any such disclosure is lawful in accordance with the Data Protection Law.

Sharing CCTV footage with other third parties

Some of our CCTV infrastructure is shared with the British Transport Police under a data sharing agreement.

In certain agreed circumstances, they may take control of a limited number of cameras and use them for activities such as the prevention and detection of crime and anti-social behaviour, policing major events and crowd control. is not responsible for the CCTV when it is in the control of a third party.

We may also disclose personal data to third parties, if required to by law or it is necessary for a legitimate purpose such as defending or bringing legal action. Data Protection Law allows us to do this where the request is supported by:

- evidence of the relevant legislation; or
- a court order
- satisfactory evidence and assurances of the legitimate interest.

Legitimate interest would include requests such as defending or making a legal claim, such as to insurers following a vehicle collision. When we are not required to provide CCTV, we will take into account the circumstances and any potential harm to individuals, we may also charge an administration fee and seek indemnity for any use beyond which it is requested.

External guidelines and best practice

Plymouth Citybus operates its CCTV systems in compliance with the CCTV Code of Practice issued by the Information Commissioner's Office in 2014. The Code describes best practice standards which should be followed by organisations operating devices which view or record images of individuals. It also covers other information derived from those images that relates to individuals.

Website visits and purchases

Mobile app use

This section shows the information we collect when you use our website. Before providing us with your details, please read the following important information regarding:

- Collection of visitor information;
- Hyperlinks;
- Cookies

Collection of visitor information

We will only use the information that we collect about you lawfully, in accordance with the Data Protection Law.

The details you provide about yourself and any other information which identifies you ('Personal Information') is held by on this website (the "Site") for operational purposes, for example member registration or processing payments. We may also use your Personal Information to personalise your experience on the Site by informing you of new products or services that we may think are of interest to you.

Plymouth Citybus gathers general information about users, for example, what services users access the most and which areas of the site are most frequently visited. Such data is used in the aggregate to help us to understand how the site and apps are used. We gather this information so that we can continue to improve and develop our services to benefit of our users. We may make this aggregated information available to users of the site and to auditors. These statistics are anonymous.

When you register with set up a travel alert, enter a competition, or buy a ticket, we ask for personal information such as your name, contact details, and other details. Once you register with and accept our Terms & Conditions, you are not anonymous to us. We may use information that you provide to alert you to our own products and services. We may contact you regarding site changes or changes to the products or services that you use.

If you buy a ticket online with, we will record your personal details and send you a confirmation email. Your personal data will be used principally to communicate with you with reference to your request.

You may opt-in to receive newsletters, exclusive discounts, special offers and other marketing emails from. You may unsubscribe at any time by logging in to your account and updating your preferences. Please note changes to your subscription preferences can take up to 14 days to take effect.

Alternatively write to Customer Services Team

Hyperlinks

We may provide hyperlinks from the Site to websites of third parties. No liability is accepted for the contents of any site operated by a third party which may be accessed via links from the Site. These links are provided for your convenience only and do not imply that or recommends the content of such sites. We encourage our users to be aware when they leave our site to read the privacy statements of each and every website that collects personally identifiable information. This Privacy Policy applies solely to information collected by.

Cookies

A cookie is a small piece of information that is sent to your browser when you access a website. Cookies contain information about your visits to that website and the purpose of cookies is to enable our websites to remember you, and your browsing habits, when you visit it again in the future.

With most Internet browsers you can configure your browser so that it refuses new cookies, prompts you to accept cookies or disables cookies altogether. Exactly how this is done is dependent on the browser you use. To find out more about the cookies we use please visit our cookie policy.

Access to our database containing personal information on registered users of the site is restricted. In order to increase security, we ask you to input a password when you register as a user of the site. Please keep this password secret. In addition, we encrypt your financial information using SSL (Secure Sockets Layer) technology so that no one else can access your credit card details as they travel through the Internet. SSL is certified by **Verisign** and is recognised as a secure way to pay on-line. As you may be aware, no data transmission over the Internet can be entirely secure. As a result, while we will always use reasonable endeavours to protect the personal information you provide to us, we cannot guarantee the security of your information and the use of our facilities (e.g. e-mail) is at your own risk. If you have any questions about paying for your ticket through the Site, please contact Customer Relations.

Travel Shop Purchases - Period Pass Records Apps and Smartcards***Personal details we hold***

When you buy annual passes/season ticket valid for one month or more, we keep a record of this on a database. We keep the following details:

- Name, address and photo card number (if applicable) and date of birth;
- Phone number and email if you provide them;
- The product type, zone, start and end date of annual tickets you have purchased, along with any duplicate, replacement or refund of these; and

- The method of payment used, but not any payment card details.
- We may collect additional details when you register an account with us, download an app or use a smartcard, for example IMEI on your mobile phone, or your location data for billing on a smartcard.

How we use your personal data

We use this information for Contractual obligations, Customer Service and administration, customer research, marketing and fraud prevention.

We will only send you information about offers and promotions if you chose to receive it and you can change your marketing preferences at any time. We will not pass your personal information to any other organisation outside of our Group of Companies (and Successor business or Secretary of State for Transport) for marketing purposes without your prior consent.

Sharing data with third parties

If you have agreed to receive information for survey or research purposes, we may share your contact details with a limited number of parties, but only for the reasons you have agreed to.

Revenue Protection and Penalty Fares

Personal details we hold

We may collect a range of personal detail during the course of revenue protection activity. This may include name, address, proof of ID, journey details, payment details, personal descriptions and other information you provide to support an appeal. This data is processed by Plymouth Citybus Ltd

How we use your personal data

We only use this information for the administration of the Penalty Fares scheme, collection of unpaid fares, fraud prevention and the prosecution of travel offences.

Sharing data with third parties

We may share your correspondence with:

- To operate a penalty fares scheme
-

Customer Relations Database

We collect your information and comments when you contact us by letter, email, web form or phone or social media.

Personal details we hold

We may hold your name, address, email address, phone number, social media name, ticket details, our correspondence with you, the compensation claims you have made and payment made by us, proof of journey or other supporting information you may provide.

To ensure that we carry have an accurate record of dealings between us (and for training purposes) we may, in certain circumstances, record or monitor telephone calls, however you will always be told when this happens.

How we use your personal data

This information is used for administration of correspondence or processing claims you have made, such as delay repay as well as for fraud prevention purposes. We also use it to respond to complaints.

Sharing data with third parties

We may also share information with other Bus Operating Companies, or under interoperable tickets for the purpose of fraud prevention. We will only do this where there is a formal data sharing agreement in place, or where an ad hoc request is received this will be dealt with on a case-by-case basis to ensure that any such disclosure is lawful in accordance with Data Protection Law.

Where We Store Your Personal Information

The information that we collect from you will only be stored in the European Economic Area ("EEA") or, where it is necessary to disclose it to our processors located outside the EEA, other jurisdictions which are acceptable according to guidance provided by the Information Commissioner and/or where appropriate legal and security safeguards are in place. Please contact the Data Protection Officer if you wish to find out more about the safeguards.

Information Security

We use a range of technical and organisational measures to safeguard access to and use of, your personal information and to ensure it retains its integrity and availability. These include structured access controls to systems, network protection, intrusion detection, physical access controls and staff training. We also consider anonymising or pseudonymising personal data where practical.

YOUR RIGHTS

OBJECT TO DIRECT MARKETING

To prevent marketing to you, you have the right to ask us not to process your personal information for marketing purposes. We will usually inform you before collecting your information if we intend to use or disclose it for such purposes. If you do not want us to use your information for marketing purposes either:

- Indicate this by NOT ticking the box to be sent marketing emails (or offers)
- If you have an account with us, by logging in and changing your contact preferences;
- Click the unsubscribe link on direct marketing emails or
- Or contact us

It is possible that you may receive a pre-scheduled communication whilst your request is being processed as this can take several days.

If you have any other objections to how we are using your personal data, please contact our data protection manager.

ASK FOR A COPY OF YOUR PERSONAL DATA

You are entitled to request a copy of the personal information we hold about you.

Please contact Mark Horide at mark.horide@plymouthbus.co.uk

We may need to ask for some further information, such as checking who you are.

Please let us know if you want to receive the information electronically.

We aim to get the information to you without undue delay and within 30 days. If we have any trouble with this timeframe, we will let you know within 30 days and explain what the problem is. Sometimes we may hold information that we don't have to provide, for example it would prejudice a police investigation or contains someone else's personal data.

In most cases we provide the copy of your data to you for free. We have set out some information about when it might not be free are provided below.

RECTIFICATION /RESTRICTION

If you believe the information we hold about you is inaccurate or incomplete you can contact us and ask us to correct it. You may also request any data processing we are carrying out on your data is halted whilst a request for rectification or objection or a dispute over the lawfulness of processing is being considered.

We will provide a response confirming the action we have taken or disagree with taking within 30 days, or provide a response within 30 days if the matter is complex and a further time is needed.

DELETION

This is also known as the "Right to be forgotten", you can request deletion or removal of personal information in some circumstances, such as where there is no compelling reason for its continued processing.

We will provide a response to you without undue delay and within 30 days, confirming whether/what personal data we have deleted and/or explaining why we don't agree that some data does not need to be deleted.

WITHDRAWAL OF CONSENT

If we relied on consent as the ground for processing your personal data, you can withdraw this consent at any time. It does not affect the processing carried out beforehand. You can withdraw consent by contacting Customer Services), our data protection manager or Group Data Protection Officer. Where you have consented to receive direct marketing communications, you can withdraw your agreement at any time, as above or where available updating your preference centre or clicking on the appropriate link in the communication. We will comply with your request without undue delay and within 30 days.

OBJECTION

You also have a right to request that no further processing takes place in relation to some grounds of processing, such as for direct marketing.

We will respond to your request without undue delay and within 30 days, confirming the action we will or won't take.

PORTABILITY

Where you have provided us with personal data and the reasons we are processing it are based on consent or our contract with you, and the processing is automated, you have a right to ask for that information be provided to you or another data controller in a structured, commonly used and machine-readable format. The right may be restricted if it is not practical for us to provide the information in this way or it adversely affects the rights of others.

If we are able to provide your personal data in this way, we will do so in 30 days or we will let you know within 30 days if we require more time or there are any issues with carrying out the request.

If you have registered a key card/similar then you will be able to access your journey information by logging on to your account. The information is normally kept for.....

INFORMATION ABOUT PROFILING AND AUTOMATED DECISION MAKING

We target some of our marketing and service communications, so that they are more relevant to you, based on the type of ticket(s) you bought, your location /travel destinations, we will try and make the communications compatible with the device you are using.

HOW WE DEAL WITH RIGHTS REQUESTS

We will try to deal with your request without undue delay and at least within 30 days. In exceptional circumstances, we may need to extend the time to respond fully, if the request is particularly complex or there are multiple requests. But we will let you know within 30 days.

We are not able to charge you a fee for dealing with rights requests, unless they are manifestly unfounded or excessive or in circumstances where copies have been provided previously. We would always let you know if we thought this was the case, so that you can make a decision about what you wanted to do next.

There are various limitations and exemptions in relation to the exercise of rights in data protection law - for example if it would affect another's rights and freedoms or if we need to retain the information to make or defend a legal claim. We intend only to rely on limitations and exemptions where it is fair to do so and always bearing in mind that it is your personal data.

Complaints

If we don't respond to within 30 days of your request or you are not happy with our response you can lodge a complaint with the Information Commissioner Office or issue legal proceedings against us.

We also have a complaints policy. If you are not happy with the way in which we deal with your data or have dealt with a rights request, then please us know. Our Data Protection Managers are the first point of contact for dealing with Rights Requests and complaints and they are assisted by Customer Relations. If you are not satisfied with the way in which they have handled your complaint or rights request then you can contact the Group Data Protection Officer, In writing to, The Go-Ahead Group Ltd, 55 Degrees North, Pilgrim Street, Newcastle Upon Tyne, NE1 6BL or by email to data.protection@go-ahead.com.

If you are not satisfied with the response you can complain to the ICO. Their contact details are.

Head office

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

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Fax: 01625 524 510

<https://ico.org.uk/global/contact-us/>

You also have the right to seek a judicial remedy, issue legal proceedings against us.

How Long we keep your personal data for

We generally retain personal data for around 6 months after the legal limitation periods in which claims can be brought or industry recommended periods. We would also retain information if we are under a legal or regulatory requirement to do so.

We may also keep your personal data for the purposes of our legitimate interests in running our Group businesses, including anonymising or pseudonymising data for analysis.

Identifiable data is kept for around 3 years for marketing.

Changes to this Privacy Policy

We may occasionally update this statement.