# Transport for Edinburgh m-tickets Privacy Policy

Transport for Edinburgh is the parent company for Lothian Buses (including its subsidiaries) and Edinburgh Trams.

The m-ticketing app is operated by Lothian Buses Limited as supplied by Corethree Limited (<u>www.corethree.net</u>). Lothian Buses is a 'Controller' of the personal data you provide to us.

This privacy policy explains how we use any personal information we collect about you when you use the Transport for Edinburgh m-tickets app.

#### **Topics:**

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# What personal information do we collect?

We collect and process the following personal information: name, address, email address, telephone number, date of birth, purchase history associated with the m-ticketing account, and payment card details.

# What information does the app access on my phone?

Certain functionality will require to access information or features on your phone to work. The app may require access to following information or functionality on your device for the following purposes only:

- Secure Storage to store tickets offline
- Wi-Fi Connection to buy tickets, share tickets, and periodically synchronise with the server
- Camera to scan QR activation codes for Edinburgh Trams m-tickets
- Bluetooth and Contacts to share tickets
- Device & App History to send our app supplier detailed crash/bug reports
- Identity to access the device's secure storage, and to securely connect with Barclays Pingit where that is used as a payment method
- Device ID to lock tickets to your phone
- Call Information to launch a phone call to our Customer Services team from the app
- Location this information is used for analysis only by our app supplier to improve the app.
  Location information is retained by time and date only, and the data is rendered anonymous in such a way that the data subject is no longer identifiable.

You can disable location reporting or location history on your phone without affecting the app:

**iOS**, go to: Settings  $\rightarrow$  Privacy  $\rightarrow$  Location Services  $\rightarrow$  m-tickets, and select "Never". **Android**, go to: Settings  $\rightarrow$  Apps/Application Manager  $\rightarrow$  m-tickets  $\rightarrow$  Permissions, and de-select "Your location".

You may manage how m-tickets accesses your phone using privacy settings on your device, or by uninstalling m-tickets.

### How will we use the information about you?

We collect information about you to manage your account and process your order. In order to do so, we share your information with our app supplier, Corethree.

We will not share your personal information with any other third parties for any other reason without your prior consent, except where we are required to do so by law (for the detection and prevention of crime, for example).

The servers where your data is stored with Amazon Web Services, are located in Dublin, Ireland.

Payment card details are stored securely by our payment provider, and will never be disclosed to anyone for purposes other than for m-ticketing mobile payments initiated by you. Payments are securely processed by our payment provider in accordance with the latest Payment Card Industry Data Security Standards.

## How long do we keep the information about you?

Transport for Edinburgh will retain your information for the time that you have an active m-ticketing account registered in your name. If there has been no account activity within the last 365 days, then your account will automatically be disabled and anonymised.

Your account can be disabled and anonymised at any time by contacting us by emailing <u>m</u>-<u>ticketing@lothianbuses.co.uk</u> or calling 0131 475 0110.

### Marketing

We will not share or use your personal information for marketing purposes.

## Access to your information and correction

You can access and edit the personal information registered against your account by tapping "My Account" in the sidebar menu, when logged into the app.

You have the right to request a copy of all the information that we hold about you. If you would like a copy of some or all of your personal information, please email: <u>mticketing@lothianbuses.co.uk</u> or write to us at: m-tickets team, Lothian Buses, 55 Annandale Street, Edinburgh, EH7 4AZ.

If at any point you believe the information we process on you is incorrect, you can ask us to correct or remove it.

If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate the matter. If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office (ICO).

### Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates in the app and on our website <u>www.lothianbuses.co.uk</u>. This privacy policy was last updated on 03 April 2019.

#### How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

- by email: <u>DPO@lothianbuses.co.uk</u>
- or write to us at: Data Protection Officer, Lothian Buses, 55 Annandale Street, Edinburgh, EH7 4AZ.