

Privacy & Data Protection Policy

Updated: 15 February 2024



This Privacy Policy was created in May 2018, in response to changes in the law regarding Data Protection and the information we hold about our customers.

Rotala is made up of different legal entities, details of which can be found here. This privacy notice is issued on behalf of Rotala so when we mention "Rotala", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Rotala Group responsible for processing your data. Rotala is the controller and responsible for this website.

The Data we collect about You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, passport numbers and details of any medical conditions.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any of the following Special Categories of Personal Data about you: details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

The only Special Category of Data we might receive and process about you is information about your health, in the form of details of any medical conditions which you have. This data is shared with us and processed on the condition that you have given us your explicit consent to process this personal data for the purposes of fulfilling our contract with you and for our legitimate business purposes, as you require us to be aware of these medical conditions when you are using our services.

How is your Personal Data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- board our vehicles which have CCTV recording equipment installed; or
- give us some feedback

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy below for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

Identity and Contact Data from booking agents based inside or outside the EU.

Technical Data from the following parties:

- a. analytics providers such as Google based outside the EU;
- b. advertising networks based inside or outside the EU; and
- c. search information providers based inside or outside the EU.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside the EU.

Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

We will only use and share your information where it is necessary for us to carry out legitimate business activities and provide our services to you. The legal purpose for which we may hold and use information about you is detailed below:

1. Contractual Necessity

We may hold your information where it is necessary for us to conduct the provision of a service to you or for the purpose for which you have originally provided the information. This may include:

- a. To provide you with ticketing products
- b. To enable us to communicate with you regarding changes to the provision of our services to you
- c. To enable us to communicate and investigate any customer service enquiry or complaint you have contacted us about

2. Legal Obligations

When you enter into a contract with us for the provision of a service to you, it may be necessary for us to hold information about you for legal purposes, such as:

To process financial transactions, including payments for ticket products you have purchased from us
To prevent fraud, we store and have access to the purchase history of products you have purchased from us

3. Marketing Reasons

We may contact you from time to time in order to provide you information regarding our service to you. This is necessary for our legitimate business interests to:

- a. develop our products/services and grow our business
- b. to study how customers use our services
- c. to develop services
- d. to grow our business; and
- e. to inform our marketing strategy

This may include, but is not limited to:

- a. Information about Bus services in your area
- b. Changes to ticketing products
- c. Changes to Rotala Policies and Procedures or the Policies and Procedures of any of its group companies
- d. To inform you of special offers or services relating to Rotala or any of its group companies

Our commitment to keeping your data secure

In any circumstances where we collect your personal data, in connection with a retail transaction, a customer survey or other purpose, we will be collecting and processing your data because it is necessary for our legitimate business interests to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy.

We may contact you regarding Rotala products or services from time to time or the products or services of any of its group companies. If you do not wish to receive such information you can unsubscribe from future marketing communications at anytime by using the Unsubscribe link at the bottom of our emails to you. If you hold a ticketing account with us, you may still receive communications from us where we contractually or legally need to update you about a product change or service issue.

We will only disclose your personal details to external organisations that are related to the provision of Rotala products or service information that is necessary in order to fulfil our contract with you. Following a retail transaction, your details will be stored securely, either by us or by our authorised provider of e-commerce services, the information we share is for the sole use of retailing tickets and understanding your customer profile. Only authorised administrators to these services will have access to your contact details and we will not have access to your bank account or card payment information through these means.

Rotala Mobile tickets and tickets printed with QR codes are traceable on our electronic ticket machines. We may use data gathered from ticket tracking to establish general passenger travel patterns and service usage. The user ID of QR Coded M-tickets is encrypted and therefore it is not possible to use ticket tracking to trace individuals movements.

International transfers

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data may involve a transfer of data outside the EEA.

- Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

Some data we are required to maintain for a minimum period of time, examples include:

- CCTV video recordings on our vehicles for up to 36 months, or longer where it is necessary for the establishment, exercise or defence of legal claims;
- Passenger lists (comprising names, addresses, dates of birth, telephone numbers, email addresses, passport details, medical conditions) for a minimum of 6 years where it is necessary for the establishment, exercise or defence of legal claims;

Your Rights

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Should you wish to enforce any of your rights listed above, please email gdpr@rotala.co.uk and let us know.

Details held for Marketing and Information updates will be used for sending you relevant information. You can unsubscribe from receiving our emails by clicking the unsubscribe link placed at the bottom of our emails. Alternatively, you may contact us at gdpr@rotala.co.uk to request removal.

Additionally, you can adjust your marketing preferences by either emailing them to gdpr@rotala.co.uk or with some companies in the Rotala group you can log into the website and check or uncheck relevant boxes to adjust your marketing preferences.

Website Cookies

Cookies are small text files that are placed on your computer by some websites that you visit. They are widely used in order to make websites work, or to make them work more efficiently.

We use website cookies to:

- a. Give you a better online experience, by retaining user login information for ease of return to the dashboard and to make our website more relevant to you
- b. Google Analytics - for the recording of anonymous data on site/page usage
- c. To track website performance

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

If you delete cookies relating to this website we will not remember things about you, including your cookie preferences, and you will be treated as a first-time visitor the next time you visit the site.