

Concessionary Travel Cards: Privacy Notice

This privacy notice explains how your local authority (referred to as **we** or **us**) collects and uses information about you (we call this your **personal information** or your **personal data**) when you apply to us for a Concessionary Travel Card, and each time you use the card to travel. It also tells you about your privacy rights and how the law protects you.

We have provided detailed information on:

- When and why we collect your personal information;
- How we use it;
- The limited conditions under which we may disclose it to others; and
- How we keep it secure.

We have appointed a data protection officer (**DPO**) who is the individual responsible for overseeing questions in relation to this privacy notice. If you have any questions or wish to exercise your legal rights, please contact our DPO.

Postal address: [Data Protection Officer, Powys County Council,
County Hall
Llandrindod Wells
LD1 5LG

E-mail: information.compliance@powys.gov.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK's supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Please note that from September 2019, the administration of Concessionary Travel Cards will also be carried out on an all-Wales basis by Transport for Wales, which is owned by Welsh Government and has responsibility for transport matters in Wales. A new, national system will allow applications to be made online. A privacy notice will be available from www.tfw.wales/Concessionary-Card-Privacy-Statement from that date.

The data we collect about you:

If you apply for a Concessionary Travel Card, we will collect, use, store and transfer the following different kinds of personal data about you:

- **Identity Data** includes first and middle name(s), preferred name, last name and title. We will also collect National Insurance number, date of birth and information relating to any previous Concessionary Travel Cards you have held (if appropriate).
- **Contact Data** includes address, email address and telephone numbers.

- **Card Data** including registration numbers of the Concessionary Travel Card and details of the journeys you undertake using it.
- **Special Categories of Personal Data** including details about your health or war veteran status if you are applying for a Disabled Concessionary Travel card. We do not collect any information on race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions or trade union membership. We do not collect information about criminal convictions and offences.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose, including planning transport and budgeting. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

How your personal data is collected:

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

- **Direct interactions.** You may give us your Identity and Contact Data by filling in an application forms or by otherwise contacting us. This includes personal data you provide when you:
 - register to apply for a Concessionary Travel Card or amend your application;
 - call to ask questions; or
 - give us some feedback.
- **Automated technologies or interactions.** When you use your Concessionary Travel Card on a bus, the bus operator will collect card details to enable the bus operator to be paid for your journey.

How we use your personal data:

We only use your personal data when the law allows us to. We have set out below a table of the ways we plan to use your personal data, and our lawful basis for doing so. The following terms are used in the table below:

- **To comply with a legal obligation:** means processing your personal data where it is necessary for us to comply with a legal or regulatory obligation that we are subject to. As a transport authority, we are legally required under the Transport Act 2000 to issue Concessionary Travel Cards to individuals who are entitled to them, and so most of our processing is for the purpose of meeting this legal obligation.
- **To perform a public task:** means where we need to process your personal data in order to carry out other tasks in the public interest. For instance, to ensure that the concessionary card scheme is administered efficiently.

We do not normally rely on consent as a legal basis for processing your personal data.

Activity	Types of data	Lawful basis
To process your application for a Concessionary Travel Card	(a) Identity (b) Contact (c) Special categories of personal data	Necessary to comply with our legal obligation to provide cards to those who are eligible
To contact you about your application to resolve any queries	(a) Identity (b) Contact	Necessary to comply with our legal obligation to provide cards to those who are eligible
To contact you about your Concessionary Travel Card or about your application	(a) Identity (b) Contact	Necessary for the performance of our public task
To contact you about usage of your Concessionary Travel Card	(a) Identity (b) Contact	Necessary for the performance of our public task to administer the Concessionary Travel Card scheme
To share data between local authorities, Welsh Government and Transport for Wales in order for them to administer the Concessionary Travel Card scheme, to reimburse operators and to protect against fraud	(a) Identity (b) Contact (c) Card Data	(a) Necessary to comply with our legal obligation to provide cards to those who are eligible (b) Necessary for the performance of our public task to administer the Concessionary Travel Card scheme
To communicate changes to Concessionary Travel scheme terms and conditions	(a) Identity (b) Contact	Necessary for the performance of our public task to administer the Concessionary Travel Card scheme
To validate your identity and conduct checks to verify your continued eligibility for concessionary travel	(a) Identity (b) Contact	(a) Necessary to comply with our legal obligation to provide cards to those who are eligible (b) Necessary to comply with our legal obligations to prevent fraud and misuse of the scheme

We will also use your personal data to send you marketing communications, if you consent to us doing so. We will only send you marketing where you agree to receive it, and you can change your mind at any time by contacting us.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Local Government for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages or email updates at any time by following the opt-out links on any marketing message sent to you by contacting us at any time by email at buses@powys.gov.uk

Disclosures of your personal data:

As set out in the table above, we share your personal data between Local Authorities, Welsh Government and Transport for Wales, who use this data to manage the Concessionary Travel Cards database and administer the scheme. This includes carrying out checks to ensure that all data is accurate and up to date.

In addition, we may share your personal data with:

- Service providers acting as our processors who provide services on our behalf
- Bus operators who will receive and process your card number when you use your concessionary travel card on a bus so that they can be reimbursed
- Professional advisers including lawyers, auditors and insurers who provide us with consultancy, legal, insurance and accounting services
- HM Revenue & Customs, regulators and other UK authorities who require reporting of processing activities in certain circumstances

Keeping your data secure:

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We do not routinely send any personal data outside the European Economic Area.

How long we keep your personal data:

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.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights:

Under certain circumstances, you have rights under data protection laws in relation to your personal data. This includes 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 the 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 the performance of our public task 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. 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.

If you wish to exercise any of the rights set out above, please contact us.

You will not have to pay a fee to access your personal data or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly

unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.