

Your Data – Contacting SPT – Complaints, Enquiries and Feedback

1. What personal information is SPT collecting?

a) When you send a letter to:

- (i) Customer Comments
Strathclyde Partnership for Transport
131 St Vincent Street
Glasgow
G2 5JF

and/or

- (ii) Strathclyde Partnership for Transport
131 St Vincent Street
Glasgow
G2 5JF

b) And when you email the following addresses:

- (i) enquiry@spt.co.uk

and/or

- (ii) complaint@spt.co.uk

c) When you submit feedback via the following online forms which are hosted on SPT's behalf by Typeform S.L. ("**Typeform**"):

- (i) Bus Stop & Shelter Damage reporting form
- (ii) Travel Card Unit ("TCU") enquiry form
- (iii) MyBus contact form

SPT will collect and use the contact information, including your email address, and all of the other personal information that you choose to provide to us in the course of your correspondence to SPT e.g. your full name, and sometimes your home address and contact tel. number.

You are providing that information to SPT for the purpose of alerting us to a matter that you want SPT to address or respond to.

2. How SPT will use the personal data you give us and who we'll share these with:

We need to use the personal information that you give us for the following purposes:

- a) To allow us to communicate and engage with you; and
- b) To allow us to investigate and respond to any issues and matters that you have raised.

We will share your personal information within SPT and with relevant third parties, such as our insurers, legal advisers and contractors, as minimally as possible to allow us to investigate the matters you raise and to allow us to respond to you appropriately.

Where SPT is processing the personal data that you provide to us in a complaint/enquiry we are likely to be doing so for the following purposes:

- a) in order to allow us to comply with the law;
- b) in the exercise of our official authority, and in order to allow us to perform our statutory functions and public tasks as the Regional Transport Partnership for the West of Scotland, and as operator of the Glasgow Subway, and as manager and operator of several bus stations throughout the Strathclyde Area; and
- c) for a legitimate reason other than performing our tasks as a public authority, and where that is the case we will set that out.

In addition, where you elect to provide SPT with more sensitive information, e.g. information relating to matters such as your sexuality, a medical condition, your health, or medication/treatment you are taking/receiving, in the course of corresponding with us, we will process that as minimally as possible within SPT and with relevant third parties in accordance with the relevant data protection legislation, which requires that we have an additional basis in law for processing these more sensitive kinds of information.

The situations where we're likely to use and share your more sensitive personal data that you give to us in the context of an enquiry/complaint are:

- Where it is necessary to use your data to protect your vital interests or the vital interests of another natural person where the data subject is physically or legally incapable of giving consent;
- Where it is necessary to use your data for reasons of substantial public interest, on the basis of EU or UK legislation;
- Where it is necessary to use your data for reasons of public interest in the area of public health;
- Where using your data is necessary to protect your vital interests or the vital interests of another natural person where you are physically or legally incapable of giving consent;
- Where using your data is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity

Information that we hold about you may be released in legal actions/cases, for example to insurers, solicitors and advocates, where this release is lawful. Information that we hold about you may be provided to courts and tribunals in relevant cases and may be shared with SPT's external legal advisers. It will also be released in response to any order/request from a tribunal/court with competent jurisdiction to make such an order/request; and/or

- Where the data we are using has been manifestly made public by you.

Where you contact SPT we will retain that correspondence as well as our response(s) as long as is reasonable and necessary to allow SPT to address your correspondence and evidence that it is appropriately responding to enquiries/complaints in the delivery of services and performance of our functions as operator of the Glasgow Subway and the regional transport partnership for the West of Scotland Area.

3. Online forms hosted on SPT's behalf by Typeform:

Typeform collects and stores personal information about you, that you provide when filling in a SPT online form, on SPT's behalf and provides this information to SPT via email.

In the course of providing this service to SPT, Typeform will process your personal information on behalf of SPT which means that their privacy policy (found at <https://admin.typeform.com/to/dwk6gt>) applies to you. Your personal information is stored solely on servers at Typeform's Amazon Web Services locations in Virginia, USA (which is Privacy Shield certified as providing adequate protection for data hosted outside the EU) and Frankfurt, Germany. These two locations are the only locations in which the personal information that you provide when filling in the RTS registration form are stored and they are not shared with any other third-party. The information that Typeform collects is processed solely on SPT's instructions and for no other purpose.