

Your Data – SPT and the Upper Circle

- SPT are administrators of the Upper Circle, a loyalty scheme available exclusively to SPT's Smartcard holders allowing you access to special offers and discounts from some of Glasgow's leading businesses.
- If you wish to register for the Upper Circle, you must complete the Upper Circle registration form, which is hosted on SPT's behalf by Typeform S.L. ("**Typeform**") at <https://sptdigital.typeform.com/to/KWGaGb>. Typeform provide SPT with data collection services.
- Typeform collects and stores personal information about you that you provide when filling in the Upper Circle registration 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 [here](#)) applies to you. Your personal information is stored solely on servers at Typeform's Amazon Web Services ("**AWS**") 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 Upper Circle 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.
- SPT uses personal information about you that you provide when filling in the Upper Circle registration form (hosted by [Typeform](#) at <https://sptdigital.typeform.com/to/KWGaGb>):
 - Your full name;
 - Full postal address;
 - Smartcard number; and
 - Email address.
- If you contact SPT re: your Upper Circle membership, we may also keep a record of that correspondence 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.

- SPT collects and uses the personal information you provide through the Upper Circle registration form only to enable us to:
 - Send you a discount booklet detailing the special offers and discounts available through Upper Circle; and
 - Provide you with details of all the latest special offers and discounts from Upper Circle, where you have consented to be contacted for such purposes,

where you have consented to be contacted for such purposes.

- As and when any changes are made to the information SPT receives from you in connection with the Upper Circle registration process and/or how we use that information, this privacy notice will be updated.
- If you do not wish your personal information to be used as described above then you should not complete the Upper Circle registration form or, where you have already completed the Upper Circle registration form, you should unsubscribe from Upper Circle email communication.
- If you wish to unsubscribe from these emails you can do so at any time by simply clicking the 'unsubscribe from this list' link at the bottom of the email or emailing communications@spt.co.uk and request to unsubscribe and you will be removed from all email communication.
- SPT will keep the information collected through the Upper Circle registration form until you ask us not to process your personal data for marketing purposes after which it will be confidentially destroyed. You can exercise this right at any time by contacting us at communications@spt.co.uk.
- SPT's site and Upper Circle email communication may, from time to time, contain links to and from the websites of the restaurants and shops offering special offers and discounts through Upper Circle. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for

these policies. Please check these policies before you submit any personal data to these websites.

Your rights and how to exercise those rights.

We have a special part of our website dedicated to the new rights that data subjects have under the GDPR. You can find that [here](#).