



Strathclyde Partnership for Transport

Privacy Notice - Strathclyde Concessionary Travel Scheme

Who we are/the service

Strathclyde Partnership for Transport (“**SPT**”) is, in terms of the Transport (Scotland) Act 2005, the Regional Transport Partnership (“**RTP**”) for the west of Scotland, covering 12 local council areas and has its main office at 131 St Vincent Street, Glasgow, G2 5JF.

The Strathclyde Concessionary Travel Scheme (“**SCTS**”) is founded on the provisions of the Transport Act 1985 which allows transport authorities to make concessionary transport schemes in certain circumstances, e.g. for the elderly and disabled.

SPT administers SCTS on behalf of its Joint Committee, which is made up of elected members from each of the funding local authority councils. All decisions relating to the operation of this scheme are made by the Joint Committee.

SCTS offers National Entitlement Card (“**NEC**”) holders reduced fares on trains, Subway and ferry* services in the Strathclyde area. Note: SCTS is complementary to the National Concessionary Travel scheme (<https://www.transport.gov.scot/concessionary-travel>) for bus travel funded separately by Transport Scotland and should not be confused.

* ferry card is available only to island and peninsula residents

This Privacy Notice explains how SPT collects and uses your personal data in relation to SCTS.

Personal data we may hold

- your name;
- your contact details;
- your date of birth;
- your IP address;
- your photograph;
- any other personal data you have chosen to provide us with.

Depending on the data you have provided, this may also include special category personal data relating to e.g. your health.

How we obtain your personal data

- (i) You provided your data when you submitted an enquiry, complaint or other correspondence to SPT.
- (ii) You provided your data when you took part in a consultation, survey or questionnaire.
- (iii) SPT takes access to the NEC Card Management System.

The purpose of processing your personal data

This data is used by SPT to:

- (i) deal with your enquiry, complaint or other correspondence.
- (ii) consult in relation to SCTS.

The legal basis for using your personal data

We process your personal data lawfully and fairly in accordance with data protection legislation.

Specifically, the following legal bases apply to the processing of the data you have provided:

- consent; and
- SPT's Public Task

How we store your personal data/keep it secure

SPT is committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we collect from you.

The length of time we keep your personal data

SPT will retain your data for as long as it is necessary, reasonable and proportionate to do so in order to provide you with this service, and in line with our retention policies. Your personal data will be securely destroyed when no longer required by SPT.

Sharing your personal data

When processing your personal data in relation to your enquiry, complaint or other correspondence relating to SCTS, SPT takes access to the NEC Card Management System, where required.

SPT will not require to share your personal data with any other third party without your consent.

Third party sites

Online consultations, surveys or questionnaires may be hosted by a third party on SPT's behalf. If you choose to participate in an online consultation, survey or questionnaire, then that third party's privacy notice will apply to you.

Your information rights

Your information rights include:

- your right of access;
- your right to rectification;
- your right to erasure;
- your right to restriction of processing;
- your right to data portability;
- your right to object to processing; and
- your right relating to automated decision making.

If you make a request, we have one month to respond to you.

If you wish to exercise any of your information rights, please contact infogov@spt.co.uk or see SPT's Data Protection page (see www.spt.co.uk/dataprotection) for more information on how to do this.

How to contact us

The Data Protection Officer for SPT:

Valerie Davidson
Assistant Chief Executive
Strathclyde Partnership for Transport
131 St Vincent Street
Glasgow
G2 5JF

Telephone: 0141 333 3298

E-mail: info.gov@spt.co.uk

Complaints to the Information Commissioner

You can complain to the ICO if you are unhappy with how we have used your data. The ICO's contact details are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Changes to this notice

SPT may update this Privacy Notice from time to time and will publish an up to date copy of the Privacy Notice here. This Notice is effective from 19 November 2020.