



## Strathclyde Partnership for Transport

### Privacy Notice - ZoneCard Travel Diary

#### Who we are/the service

Strathclyde Partnership for Transport (“**SPT**”) is the Regional Transport Partnership for the west of Scotland, covering 12 local council areas established in 2006 by virtue of the Transport (Scotland) Act 2005, and has its main office at 131 St Vincent Street, Glasgow, G2 5JF.

SPT is administrator of the ZoneCard ticketing arrangement, and SPT undertakes this role on behalf of the public transport operators who accept ZoneCard tickets (“**ZoneCard Participating Operators**”).

As a ZoneCard holder, you have the option of completing a week-long travel diary online at [spt.co.uk/diary](http://spt.co.uk/diary) detailing all the journeys that you make with your ZoneCard (“**ZoneCard Travel Diary**”). If you complete and submit your ZoneCard Travel Diary online to SPT, you will be eligible to receive a voucher which can be redeemed against your next ZoneCard purchase, and you will be eligible for a prize draw for the chance to win an annual ZoneCard.

This Privacy Notice explains how SPT collects and uses your personal data in relation to the ZoneCard Travel Diary.

#### Personal data we hold

- your name;
- your address;
- your e-mail address;
- your telephone number(s);
- your gender; and
- your age group.

#### How we obtain your personal data

You provided the above data when you completed and submitted a ZoneCard Travel Diary online.

#### The purpose of processing your personal data

This data enables SPT to:

- analyse how ZoneCard holders use their cards, for the purposes of determining how ZoneCard revenues should be shared with the ZoneCard Participating Operators;
- contact you if you are the winner of the annual ZoneCard prize draw;
- provide you with a ZoneCard voucher, where you are eligible; and
- contact you to confirm details of journeys in your Travel Diary to inform SPT’s analysis of travel patterns, where you agree.

#### The legal basis for using your personal data

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

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

- SPT's Public Task; and
- consent

### **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**

SPT will not share your personal data in relation to the ZoneCard Travel Diary with any third party.

### **Your information rights**

Your information rights include:

- your right of access;
- your right to rectification;
- your right to erasure;
- your right to withdraw consent;
- your right to restriction of processing;
- your right to object to processing;
- your right to data portability; 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](mailto:infogov@spt.co.uk) or see SPT's Data Protection page (see [www.spt.co.uk/dataprotection](http://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](mailto: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 15 October 2019.