



## Strathclyde Partnership for Transport

### Privacy Notice – National Entitlement Card 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 National Entitlement Card Scheme (“NEC”) gives elderly and disabled residents in the Strathclyde area free bus travel in Scotland and, through the Strathclyde Concessionary Travel Scheme, reduced fares on trains and Subway in the Strathclyde area.

SPT administers the NEC as agent for 12 of the local Councils in the Strathclyde area.

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

#### Personal data we hold

The following information is processed by SPT during application and within the NEC Scheme Card Management System:

Data category
Person Data (Title, Name, Gender, Date of Birth, Photo, Death Indication and Date, <i>UCRN-Unique Citizen Reference Number</i> <sup>1</sup> )
Address Data (Address, Postcode, Local Authority, UPRN-Unique Property Reference Number; Delivery Address, Delivery Postcode)
Person and Residence Proof Data (Indicator that proofs seen, Type of proofs seen, Photo referee details)
Contact Details Data (Phone Numbers, Email Address)
NEC Scheme Card Data (Applicant ID, Card number (NEC), Type of Card ‡, Card Expiry Date)
General Travel Scheme Card Data (Card Number (ITSO))
National Concessionary Travel Schemes Card Data (Type of Card ‡, Product Expiry Date) – only where required
Card Hotlist Data (Hotlist reason, Hotlist Date) – only as required
Entitlement Proof Data (Indicator that proofs seen, Type of proofs seen ‡) – only where required
Assent Data (Agreement to processing required for card, <i>Consent to additional data sharing – pre May 2018</i> <sup>2</sup> )
School Data (Establishment details) – only where delivery to alternative address required
Notes History Data (Freeform notes on a customer record)
Audit Trail Data (All data entered into the Card Management System listed above, i.e. non-paper data) ‡
System Transaction History Data (A summary of each administrative transaction, e.g. form received, card issued, card recorded as lost/stolen etc.)
Scans and physical copies of paper forms held centrally ‡
Scans and physical copies of paper forms held locally ‡

<sup>1</sup> UCRN is expected to be removed from NEC Scheme processing in due course

<sup>2</sup> The historic consent to share data recorded in this field has not been obtained in accordance with best practice, and is not to be used as the basis for any processing.

‡ may include personal data from a special category, e.g. health, including information relating to any disability you may have

## How we obtain your personal data

- (i) You provided the above personal data and special category personal data when you submitted an application for a NEC
- (ii) SPT takes access to the NEC Scheme Card Management System.

## The purpose of processing your personal data

This data enables SPT to administer the NEC Scheme, and to facilitate the issue of NECs.

It also enables us to provide you with information, advice and guidance on other travel schemes and/or services administered by SPT that are available to you.

## 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:

- Contract
- SPT's Public Task
- Public interest

Special category data is processed as part of our statutory functions.

## How we store your personal data/ keep it secure

SPT is committed to ensuring that your personal data is secure. 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 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. Paper application forms held by us are destroyed once your record is live on the NEC Card Management system.

## Sharing your personal data

When processing your personal data, SPT takes access to the NEC Card Management System.

The Euclid Group is contracted via Transport Scotland to produce National Entitlement cards. SPT may share your information with the Euclid Group for the purposes of issuing your NEC.

Occasionally SPT requires to share your name, date of birth, National Insurance number and address by email with Social Security Scotland to confirm the review date of the award. When this happens, the email is destroyed after 1 year.

## Your information rights

Your information rights include:

- Your right of access
- Your right to rectification

- Your right to erasure, in certain circumstances
- Your right to restriction of processing, in certain circumstances
- Your right to data portability, in certain circumstances
- Your right to object to processing, in certain circumstances
- 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  
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

Web site: <https://ico.org.uk/>

### 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 November 2024.