



## Strathclyde Partnership for Transport

### Privacy Notice - Smart Zonocard

#### 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.

- 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**”).
- Unicard is the technology supplier for the ZoneCard smart ticket;
- NMI is the Payment Service Processor for online ZoneCard sales;
- Euclid is the supplier of ZoneCard smartcards to customers.

A ZoneCard is a ticket providing travel by bus, rail and Subway in the Strathclyde region.

A Smartcard is a form of digital storage media which can be used to hold an electronic ticket (such as a ZoneCard ticket).

Data associated with a ZoneCard ticket (for example where and when a ZoneCard ticket has been used) will be used for the management of the ZoneCard ticketing arrangement.

Customers wishing to obtain a new ZoneCard smartcard, associate an existing smartcard with a Zonocard account, or purchase ZoneCard products online, will require to register for an online ZoneCard account at <http://www.zonocard.co.uk>. This will enable various benefits for customers such as the opportunity to obtain a refund in the event of a lost/stolen smartcard.

A ZoneCard online account can be managed through the customer Self Service Portal at [www.zonocard.co.uk](http://www.zonocard.co.uk), or using the ZoneCard mobile app.

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

#### Personal data we hold

- Name;
- Address;
- E-mail address;
- Date of birth;
- Telephone number(s);
- Photograph;
- Unique identification number (Smartcard number);

- Payment information (partial payment card details, and transaction amounts for Zonecard ticket purchases);
- ZoneCard website or app usage data;
- Travel history.

### **How we obtain your personal data**

You provided your name, date of birth, contact details, and photograph when you registered for a ZoneCard account via the ZoneCard website or app. SPT obtained your data from Unicard, who host the ZoneCard site and app on SPT's behalf. Unicard collects and stores the data you submitted and provides SPT with access to this information.

### **The purpose of processing your personal data**

This data enables SPT to:

- Administer the ZoneCard ticketing arrangement (including allocation of ticket revenue to Participating Operators in a proportional manner).
- Process payment and issue your ticket.
- Address customer enquiries.
- Analyse usage of the ZoneCard customer website and mobile app.
- Send you marketing information relating to ZoneCard, where you have opted in to receive this.

### **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;
- Consent (where you have opted in for marketing, for over 18s only).

### **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.

Where SPT engages third parties to process personal data on our behalf, they do so on the basis of clear written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measure to ensure the security of the data.

### **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. Payment transaction data will be deleted after 6 years.

### **Sharing your personal data**

Unicard hosts the ZoneCard site on SPT's behalf. In the course of providing this service to SPT, Unicard is required to share with SPT the data you have provided via the site.

Unicard also require to share your data with Euclid Ltd, a third-party company who will print and issue your personalised ZoneCard where required.

NMI is the payment processor used on SPT's Smart ZoneCard site. In the course of providing payment processing services to SPT, this provider is required to collect and process your financial information in order to fulfil your purchase.

NMI shares the information below with SPT:

- the name on your payment card;
- the first six and last four digits on your payment card; and
- the expiry date on your payment card.

Unicard and NMI have their own Privacy notices (see <https://www.unicard-uk.com/privacy> and <https://www.nmi.com/eu/privacy-policy/> and SPT would urge you to review these before submitting personal data.

SPT will not share your personal data in relation to your Zonecard account with any other third party on a regular basis.

SPT may share your personal data in certain emergency situations, or with the police or other law enforcement agencies, in relation to specific investigations/prosecutions

### Overseas processing

The data you provide in connection with your ZoneCard account will be transferred between Unicard UK and Unicard Bulgaria.

Whether your data is processed in a country within the UK or the European Economic Area, any such processing will be subject to appropriate contractual safeguards and carried out in accordance with UK and EU privacy and data protection legislation.

### 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
- Your right to withdraw consent in terms of marketing

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 January 2024.