



Strathclyde Partnership for Transport

Privacy Notice – Contacting SPT

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.

This Privacy Notice explains how SPT collects and uses your personal data when you contact us by e-mail, post, telephone, or via SPT’s web site or social media platforms, or by filling in forms, for example in relation to:

- Complaints, enquiries and/or feedback on any of SPT’s services
- SPT’s Regional Transport Strategy
- The Upper Circle, a loyalty scheme available exclusively to SPT’s Smartcard holders
- Competitions run by SPT’s Marketing Team
- Recovering an abandoned bike

Please note that telephone calls made to and received from SPT’s Contact Centre and Subway office premises may be recorded.

Personal data we hold

Depending on how you have contacted SPT, the information we hold may include your:

- Name and contact details
- Telephone number(s)
- Social media handle
- Smartcard number
- Job titles (where relevant)
- 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 or sexuality.

How we obtain your personal data

- (i) You provided the above data when you contacted SPT by e-mail, post, telephone, or via SPT’s web site or social media platforms.
- (ii) Depending on how you contacted SPT, we may have obtained your data from Typeform S.L. (“**Typeform**”), who hosts certain contact forms on SPT’s behalf. Typeform collects and stores the data you submitted via these forms.
- (iii) We collected your personal data from websites and publications that are already in the public domain.

The purpose of processing your personal data

This data is used by SPT for the following purposes:

- to allow us to investigate and respond to any issues and matters that you have raised
- for our management and administrative purposes as an employer and in the interests of safe, secure, effective and efficient provision of transport and services to the public
- to allow SPT and third parties whom it expressly authorises, such as its external legal advisors, loss adjusters, insurers and insurance brokers, to investigate, defend and otherwise process and respond to any reports of loss, injury or damage on premises where SPT is responsible
- to enable SPT to communicate, consult and engage in respect of its Regional Transport Strategy, associated plans and programmes and related transport planning and policy matters
- to send you a discount booklet and information on special offers and discounts available through the Upper Circle, where you have consented to be contacted for such purposes
- to select and contact a competition winner
- to respond to your claim to an abandoned bike and to administer SPT's Register of Bikes
- for quality control monitoring and the training of SPT personnel

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 personal and the special category personal data you have provided:

- SPT's Public Task
- Consent, for example where you have asked the Contact Centre to resolve an issue for you
- Legal obligation
- Contract
- Vital interests

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. 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 relation to the reason you have contacted us, and in line with our retention policies. Your personal data will be securely destroyed when no longer required by SPT. Specific details can be provided on request.

The personal data we collect via telephone call recordings will be retained for a period of 31 days, after which it will be permanently deleted, unless they are required in respect of an incident/event captured within the recording. In such cases, recordings shall be retained and securely destroyed as set out above.

Sharing your personal data

Depending on why you have contacted SPT, we may require to share your personal data as follows:

- (i) where it is necessary to protect the vital interests of you or another person
- (ii) where it is necessary for reasons of substantial public interest, on the basis of legislation
- (iii) where it is necessary for reasons of public interest in the area of public health
- (iv) with SPT managers involved with disciplinary, technical or safety investigations, where it is necessary
- (v) where it is necessary to release your data in legal actions/cases, for example to insurers, solicitors and advocates
- (vi) where the data we are using has been manifestly made public by you
- (vii) with the police, the British Transport Police and any other criminal/regulatory investigation bodies/agencies such as the Crown Office and Procurator Fiscal Service, the Office of the Rail Regulator and the Health and Safety Executive, in relation to specific investigations/prosecutions
- (viii) with Government agencies able to compel disclosure if we receive an appropriate request
- (ix) with Courts and employment tribunals in relevant cases, and may be shared with external legal advisers in these cases
- (x) in response to an order from a court/tribunal with competent jurisdiction to make such an order
- (xi) in response to investigations by external regulators such as Audit Scotland, the UK and Scottish Information Commissioners and Scottish Public Services Ombudsman.

Third party sites

Please note that Typeform hosts certain online contact forms on SPT's behalf, and provide SPT with data collection services. In the course of providing these services to SPT, Typeform are required to share with SPT the data that you provide when you complete either of the online forms. This means that Typeform's privacy notice (see <https://admin.typeform.com/to/dwk6qt>) also applies to the processing of your personal data. Please ensure that you review their Privacy Notice to understand how this may affect your data.

Full details of any transfer of your personal data to a third party required in order to for example, select a competition winner and/or distribute a prize, or to engage in surveys or consultations will be set out in the relevant announcement.

SPT's web site and e-mail communications may, from time to time, contain links to and from third party sites (for example in relation to competitions, promotions, surveys or consultations). 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.

Overseas processing

Where you have provided data via an online form hosted by Typeform on SPT's behalf, the data may be stored by Typeform on servers outside of the European Economic Area or UK.

Whether your data is processed in the UK, a country within the European Economic Area or the USA, 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 withdraw consent
- 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 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

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 April 2021.