



# Strathclyde Partnership for Transport

## Privacy Statement

September 2023

### 1. Introduction

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 responsible for transport planning and delivering transport solutions across the SPT area in conjunction with our member councils and industry partners.

We operate the Glasgow Subway and a number of bus stations across the west of Scotland, support a range of socially necessary bus services, and administer ZoneCard and other tickets to help people connect their journeys. SPT also works with other organisations to provide free and discounted travel for those who are eligible.

We sometimes need to process your personal data so that we can provide you with these and other services.

This Privacy Statement sets out how SPT collects, uses and protects your personal data as well as your rights in respect of such personal data.

Data by which you may be identified will only be used in accordance with the specific Privacy Notice relating to the service(s) you are using.

### 2. Personal data we may hold

We may collect and process the following data about you:

- **Personal Data** which may include your name, address, date of birth, telephone number, e-mail address etc.
- **Special Category Data** which may include (but is not limited to) information about your race, religion, health or sexual orientation. SPT recognises the significance of special category personal data and will only process such data if certain conditions are met.

### 3. How we obtain your personal data

- 3.1 **Data you give us.** For example, you may give us data about yourself when filling in forms or corresponding by phone, e-mail or otherwise when you apply to use SPT tickets and/or services, when you take part in SPT competitions/surveys or when you send SPT an enquiry or/ complaint.
- 3.2 **Data we collect about you.** For example through cookies and similar technologies to when you use our website, including your IP address, browser type, internet service provider, web pages you visit etc.
- 3.3 **Data we receive from other sources.** For example, we may receive your data from via third parties that SPT works with to provide our services, such as local authorities, contractors and other third parties involved in the delivery of those services, including bus operators.

#### 4. Why and how we use your personal data

We use your personal data to perform our statutory and public functions as the RTP to undertake activities to promote and encourage safe, integrated, efficient and economic transport facilities and services, and to deliver SPT's Regional Transport Strategy.

Under privacy and data protection legislation, SPT is only allowed to use personal data if we have a proper reason or 'legal basis' to do so.

This will vary depending on the service(s) you are using, and will be set out in the specific Privacy Notices relating to those services.

There are a number of these 'legal grounds' we rely on, which include:

- **Consent** – where you have given SPT your permission for your personal data to be processed for a specific purpose.
- **Contract** – where the processing of your personal data is necessary for a contract you have with SPT, or you are looking to enter into with SPT.
- **Public Task** - where the processing of your personal data is necessary for SPT to perform its statutory and public functions as the RTP for the West of Scotland.
- **Legal Obligation** – where the processing of your personal data is required by law.
- **Vital Interests** – where the processing of your personal data is necessary to protect your vital interests or the vital interests of others in circumstances where we will not be able to seek your consent.

Special category data and data related to criminal offences is processed as part of our statutory functions.

In all cases we will process your personal data only when necessary and in accordance with privacy and data protection legislation.

#### 6. 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.

#### 7. 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 fulfill the purposes for which your data was collected, and in line with our retention policies. Your personal data will be securely destroyed when no longer required by SPT.

#### 8. Sharing your personal data

There may be circumstances where we will need to share your data with other organisations in order for us to provide services to you, for example, payment processing organisations, local authorities, and contractors, including bus operators.

Who we share your personal data with and why will vary depending on which services we are providing to you, however, this will be explained in the specific Privacy Notices relating to those services.

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.

SPT will not sell your personal data to any third parties.

## 9. Overseas processing

The data that we collect from you is stored in the UK. It may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), and it may also be processed by staff operating outside the EEA who work for us or for one of our contractors.

This will only happen where necessary, and details of any such processing will be set out in the specific Privacy Notice(s) relating to the service(s) you are using.

## 10. Third party sites

Our website may contain links to sites owned and operated by third parties. They have their own Privacy Notices, and we would urge you to review them before browsing those sites. SPT does not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

## 11. Your information rights

Under privacy and data protection legislation, you have a number of information rights. The rights available to you will depend on the reason (legal basis) for processing your personal data. These rights include:

### Your right to be informed

You have the right to be informed about the collection and use of your personal data.

### Your right of access

You have the right to ask us for copies of your personal data (commonly known as a Subject Access Request ("SAR")). For more information on making a SAR, please visit SPT's Data Protection page.

### Your right to rectification

You have the right to ask us to rectify data you think is inaccurate. You also have the right to ask us to complete data you think is incomplete.

### Your right to erasure

You have the right to ask us to erase your personal data in certain circumstances.

### Your right to restriction of processing

You have the right to ask us to limit the way your personal data is processed in certain circumstances.

### Your right to data portability

You have the right to ask that your personal information be provided to you or another data controller in a structured, commonly used and machine-readable format, in certain circumstances.

### Your right to object to processing

You have the right to object to the processing of your personal data in certain circumstances.

### Your right relating to automated decision making

You have the right, in certain circumstances, to prevent the automated decision making or profiling of your personal data. SPT does not use automated decision making processes.

### Your right to withdraw consent

If SPT has relied on consent as the legal ground for processing your data, you can withdraw this consent at any time.

You are not required to pay any charge for exercising your rights. 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 visit 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.

## 12. Cookies

SPT and our third-party providers set and use Cookies and similar technologies on our website. For more information about how we use Cookies and similar technologies and how you can control and manage them, please visit our Cookies page.

## 13. 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: [infogov@spt.co.uk](mailto:infogov@spt.co.uk)

## 14. 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/>

## 15. Changes to this statement

SPT may update this Privacy Statement from time to time and will publish an up to date copy of the Privacy Statement here. This Statement is effective from September 2023.