



## Strathclyde Partnership for Transport

### Privacy Notice - Strathclyde Concessionary Travel 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 Strathclyde Concessionary Travel Scheme (“**SCTS**”) is founded on the provisions of the Transport Act 1985 which allows transport authorities to make concessionary transport schemes in certain circumstances, e.g. for the elderly and disabled.

SPT administers SCTS on behalf of its Joint Committee, which is made up of elected members from each of the funding local authority councils. All decisions relating to the operation of this scheme are made by the Joint Committee.

SCTS offers National Entitlement Card (“**NEC**”) holders reduced fares on trains, Subway and ferry\* services in the Strathclyde area. Note: SCTS is complementary to the National Concessionary Travel scheme (<https://www.transport.gov.scot/concessionary-travel>) for bus travel funded separately by Transport Scotland and should not be confused.

\* ferry card is available only to island and peninsula residents

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

#### Personal data we may hold

- Name
- Address
- Date of birth
- Telephone number(s)
- E-mail address
- IP address
- Photograph
- 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.

#### How we obtain your personal data

- (i) You provided your data when you submitted an enquiry, complaint or other correspondence to SPT.
- (ii) You provided your data when you submitted your application for a Ferry Card
- (iii) You provided your data when you took part in a consultation, survey or questionnaire.
- (iv) SPT takes access to the NEC Card Management System.

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

This data is used by SPT to:

- (i) deal with your enquiry, complaint or other correspondence.
- (ii) administer the SCTS
- (iii) consult in relation to SCTS
- (iv) 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:

- Consent
- SPT's Public Task
- Public interest
- 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.

Your data is held within the UK and is not transferred outwith the EEA.

## **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**

When processing your personal data in relation to your enquiry, complaint or other correspondence relating to SCTS, SPT takes access to the NEC Card Management System, where required.

If you submitted your application for a Ferry Card via the Post Office, the Post Office will share your personal data with SPT. The Post Office has its own Privacy Notice (at <https://www.postoffice.co.uk/privacy>), and we would urge you to review this before submitting personal data.

SPT will not require to share your personal data with any other third party without your consent.

## **Third party sites**

Online consultations, surveys or questionnaires may be hosted by a third party on SPT's behalf. If you choose to participate in an online consultation, survey or questionnaire, then that third party's privacy notice will apply to you.

## 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](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

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.