# PRIVACY INFORMATION

# **Travelwest Smartcard**

## **Management and Ownership**

This portal is owned and operated by Smart Applications Management, formally South West Smart Applications Limited (SWSAL), on behalf of the West of England Partnership: Bath and North East Somerset, Bristol City, North Somerset and South Gloucestershire Councils (referred to as 'us', 'we' or 'our').

West of England Partnership is a member of SAM/ SWSAL ( www.talktosam.co.uk/ ) a not for profit mutual, member owned managed service provider.

#### Terms of use

By entering this portal, you agree to this Privacy Notice and our <u>Terms of use</u>. Travelwest may revise these terms and conditions at any time, without notice. Continued use of this site after a change has been made is your acceptance of the change.

## **Privacy Notice**

South Gloucestershire Council is the data controller, and Smart Applications Management/ SWSAL is the data processor, for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679), which means it determines what your data is used for and why it is collected.

The purpose of this privacy notice is to tell you about what information we collect about you when you use our service, how we use that information and who we may share it with.

#### What data we need to collect and the legal basis for processing it:

Collecting this data is necessary to provide services in relation to the Travelwest card.

To provide this service, we will process:

- Name
- residential Address
- email address
- telephone numbers
- date of birth
- gender
- bankcard details for online payments
- photographs

Travelwest doesn't capture and store any personal information about individuals who access this portal, and you cannot be personally identified unless you choose to provide your personal details by registering on our website. By choosing to provide your personal details when registering on our website you are consenting to us using your data for the provision of the services you require.

We may collect anonymous usage data through our portal to better serve our users in future online services or to improve current ones.

#### How long we will keep your data for:

We will hold this information for whilst you have a live card on your account (a live card is one that is within its expiry date and has not been blocked/cancelled). After this your information will be held for 7 years and then deleted or anonymised data archived.

### Why we need to collect your data:

Smart Application Management processes personal data on behalf of the Data Controllers for the following purpose(s):

- •to provide card support service to the customers;
- •to enable customers to pay using contactless EMV on iPoints;
- to verify entitlement to a card product (Eligibility);
- to comply with contractual obligations;
- to comply with legal obligations; and
- network support, customer support and troubleshooting.
- •to advise customers of major changes to the scheme
- •to advise customers of serious issues that are impacting the availability of the service

### Who we share your data with and why:

Your personal details are stored for operational purposes by Smart Applications Management/ SWSAL (14 High Cross, Truro, Cornwall, TR1 2AJ, Registration Number: 07205882) and may be shared with us. Representatives of South West Smart Applications Limited will have access to your personal details for operational purposes only. Payment details shall remain private unless you voluntarily provide these over the phone.

We don't share your data with any other organisation or individual unless you give your express consent or unless there is a lawful requirement to do so (for example – for the detection and prevention of crime).

As part of processing personal data on behalf of the Data Controller, Smart Applications Management/ SWSAL does not transfer personal data to third countries outside the EEA.

#### Your rights as a data subject:

You have the right to ask for access to your data and where data is found to be inaccurate to have that data corrected. In certain circumstances you have the right to have data held about you erased, or the use of it restricted. You may be able to object to processing and may also have the right to have your data transferred to another data controller. Requests should be sent to <a href="mailto:contact@swsal.co.uk">contact@swsal.co.uk</a>

You can ask to see what information we hold about you and have access to it. You can do this by contacting:

### DPO@southglos.gov.uk

Data Protection Officer, PO Box 1953, The Council Offices, Badminton Road, Bristol, BS37 0DB

Other questions about the data being processed may also be sent to the above address.

You also have a right of complaint to the Information Commissioner's Office (ICO) at www.ico.org.uk if you think we have not dealt with your information in a proper manner.

#### Fraud Prevention and Detection:

South Gloucestershire Council is required by law to protect the public funds it administers. It may share information provided to it with other bodies responsible for auditing, administering public funds, or where undertaking a public function, in order to prevent and detect fraud. For more information visit

http://www.southglos.gov.uk/council-and-democracy/data-protection-and-freedom-of-information/national-data-matching-exercise-201617/

This website complies with the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations of 2011.