Privacy Notice – Customers & Passengers



1. Who does this privacy notice apply to, and what is it about?

This privacy notice applies to you if you are or were a customer of London General Transport Services LTD (Trading as Go-Ahead London); and/or a passenger on any of the passenger transport services arranged or provided by Go-Ahead London.

This privacy notice explains:

- what personal data we collect about you;
- what we do with your personal data;
- · your rights in respect of your personal data; and
- what to do if you have any questions or complaints about our use of your personal data.

We take your privacy very seriously and are committed to abiding by Data Protection Law which protects your privacy. This privacy notice may change from time to time and the most up-to-date version will always be available on this website. It is your responsibility to read this privacy notice and check this website for the current version.

Who is controller of your personal data?

For the purposes of this privacy notice, we shall mean London General Transport Services LTD, trading as Go-Ahead London. The controller's representative for the purposes of this privacy notice is Go-Ahead London's Data Protection Manager, who can be contacted using the contact details provided at the end of this notice.

3. What personal data do we collect about you, and how?

We collect the following types of personal data about you:

- your name and title;
- your contact information, including telephone number and email address;
- if you register to use our websites and/or apps, your email address and the password you set up for the app;
- your transaction or payment information however please note that full debit card and credit card information is not processed by us as it is passed through to a PCI-DSS compliant third party payment provider in accordance good industry practice;
- if you are disabled or have special needs, information about your disability, special needs or mobility requirements;
- if you set up an account with us, your marketing preferences;
- your image, where it is captured by CCTV or other visual recording equipment on the passenger carrying vehicles used to provide our passenger travel services;
- any other personal data that you provide to us when you communicate with us. We collect your personal data in a variety of ways, including:
- by you:
 - o creating an account with us;
 - purchasing products and/or services from our websites and/or apps;
 - o submitting your personal data on our websites and/or apps, for example, via the 'Contact Us' page;
- contact us by letter, email, or on social media;
- by us:
 - o making visual and/or audio recordings on the passenger carrying vehicles used to provide our travel services; and
 - recording telephone conversations with our customer contact centre representatives.
- 4. What do we do with your personal data and on what basis?

We use your personal data for the following purposes and describe below the legal basis on which we process your personal data:

Purpose	Legal Basis	Explanation
 To provide our products and services to you To provide you with information, advice and guidance about our products and services To manage our relationship with you, including to respond to any questions you ask and deal with any complaints you make. To develop our strategy and operational processes To understand how our customers, use products and services provided by us and third parties 	Fulfilling our legal duty Performance of our contract with you Legitimate interest Consent	Being efficient about how we fulfil our legal and contractual duties and manage our relationship with you Keeping our business records up to date Developing and improving our business Developing our products and services, and what we charge for them Developing relationships with business partners, to enhance our product and service offering

Privacy Notice – Customers & Passengers



- To manage how we work with other companies that provide services to us and our customers
- To comply with the laws and regulations that apply to us
- To seek to enforce and defend our legal rights
- To seek to detect, investigate, prevent and report crime and antisocial behaviour
- To seek to protect and promote your health & safety and that of our other customers, staff and third parties

- Preserving our legal position, seeking to detect and prevent crime and antisocial behaviour and seeking to promote health and safety
- Enabling us to provide safe passenger transport services

5. What if we have obtained your consent to use your personal data?

Where we process your personal data on the basis of your consent, you may withdraw that consent at any time.

6. What are our obligations to collect, and your obligations to provide, personal data?

We have no legal obligation to collect personal data about you, but we need to collect some personal data in order to provide you with our products and services, collect payment for such products and services and deal with any questions or complaints you have about them. You have no legal obligation to provide your personal data to us, but we may not be able to provide you with our products and services or deal with your questions or complaints if you do not provide us with your personal data.

7. Who will we share your personal data with?

We may share your personal data with:

- other Go-Ahead Group Companies;
- our suppliers and sub-contractors who help us to provide our products and services to you;
- our legal and professional advisors;
- government bodies and regulatory authorities, including the Driver and Vehicle Standards Agency, the Police and other crime prevention and detection agencies and the UK Information Commissioner's Office;
- the Traffic Commissioners, the courts and other dispute resolution arbitrators and mediators, other parties to legal proceedings and passenger transport watchdogs; and
- other companies that take on any part of our business as a result of a restructure, merger or transfer of that part of our business.

In addition, if you follow a link to any of the websites of advertisers and affiliates on our websites or apps, these third party websites may have their own privacy notices or policies.

We do not accept any responsibility or liability for these notices or policies or the third parties' handling of your personal data. Please check the relevant third party's privacy notice before you submit any personal data to them.

8. Do we make international transfers of personal data?

The information we collect from you will only be stored in the UK or a country which data protection law deems provides an adequate level of protection (permitted countries) or, where it is necessary to disclose it to our processors located outside the permitted countries, other jurisdictions where appropriate legal and security safeguards are in place. Please contact the Data Protection Officer if you wish to find out more about the safeguards.

9. For how long will we process your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, accounting or reporting requirements in respect of our relationship with you.

Where we process your personal data to fulfil:

- a legal obligation, we will process such personal data for so long as necessary to fulfil that obligation; or
- a contract with you, we will process such personal data until we fulfil that contract and for so long thereafter as may be necessary to keep a record of that contract, which will typically be for 6 years, and to deal with any complaints or claims relating to that contract, which will be until the final resolution of such complaints or claims (having regard to the nature of any potential claims and the limitation of liability periods that apply to them).

Where we process your personal data based on:

our legitimate interest, we will process such personal data for so long as necessary to achieve that legitimate interest, which will
typically be for 6 years after we collect your personal data or the last time we use your personal data (or longer in relation to any

Privacy Notice – Customers & Passengers



legal claims that might arise having regard to the nature of any potential claims and the limitation of liability periods that apply to them); or your consent, we will process such personal data until you withdraw that consent. We may also retain your personal data for longer if we cannot delete it for legal, regulatory or technical reasons.

10. What rights do you have in relation to your personal data?

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you want to know more or if you want to exercise any of the rights set out above, please contact the Go-Ahead Group data protection officer.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

11. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. What should you do if you have any questions or complaints?

If you have any questions or complaints about how we process your personal data, or otherwise about the matters set out in this privacy notice, please contact the Go-Ahead London's Data Protection Manager at:

- Address: Data Protection Manager, London General Transport Services LTD, No.18 Merton High Street, London, SW19 1DN or
- Email address: DataProtection@goaheadlondon.com

You also have the right to complain at any time to the UK Information Commissioner's Office about how we use your personal data and can contact them on their helpline: 0303 123 1113 or website at https://ico.org.uk/