

Note:

Translink and the Public Transport Companies may amend this privacy statement or supplement it with new information. We therefore recommend that you check this page regularly. If there are major changes to the privacy statement, this will be clearly stated in the beta OVpay app and on the website ovpay.nl/en.

Subject: Privacy statement for the beta OVpay app

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At Translink and the Public Transport Companies, we want you, the passenger, to be able to move freely and choose the way you travel. We can help you achieve this, but sometimes we need to know something about you. Among other things, we believe that privacy revolves around freedom and the ability to decide for yourself how and by whom your personal data are used.

This privacy statement sets out how we deal with your personal data when you use the beta OVpay app. You will also find out who are the Controllers for processing your personal data, which of your personal data are processed, and what influence you have over this.

1. Glossary

Several terms are used in this privacy statement, the meaning of which we explain in this section.

Payment Information: the amounts (in euros) that have been debited from your account or spending limit after you have used the contactless Payment Card to check in and out on public transport in the Netherlands;

Payment Card:

- contactless debit cards issued by ABN AMRO, Rabobank, ING, Regiobank, ASN and SNS (the latter three names are De Volksbank brands) and Bunq;
- Mastercard and VISA contactless credit cards issued by International Card Services;
- contactless debit and credit cards issued by domestic or foreign banks affiliated with Mastercard and/or VISA payment schemes.

Public Transport Companies: the nine companies that have a public transport concession (based on the Dutch Passenger Transport Act 2000), namely Arriva, EBS, GVB, HTM, Keolis, NS, Qbuzz, RET and Transdev.

Travel Information: information about your journey(s) on public transport including station/stop, date/time and line number.

Service Reference ID: a 14-digit alphanumeric code (combination of letters and numbers) created uniquely for each payment. This code is allocated to the amount that is debited from your bank account or spending limit.

Processor/Subprocessor: a company that processes the personal data on behalf of another company (the Controller). Although this is a task that the controller can do itself, it has opted to delegate it to another party. If a processor then asks another company to process the personal data, that company is a subprocessor.

Translink: Trans Link Systems B.V., with its registered office at Stationsplein 151-157, 3818 LE Amersfoort;

Mode of transport: type of vehicle in which you have travelled.

Controller: the company (or several companies) that determine(s) the 'purpose' and the 'means' for processing personal data.

2. What are personal data?

As soon as data can be traced directly or indirectly to a person, these data are referred to as personal data. Examples of personal data include your name, email address, street address, date of birth and bank account number. Your username and journey information can also be regarded as personal data.

3. How do we deal with personal data?

Personal data relate to you. That is why we handle them with care. We also do not process more personal data than is absolutely necessary. Naturally, we process and secure personal data in accordance with the requirements of the General Data Protection Regulation (GDPR) and other laws and regulations. We have regular checks carried out to protect the privacy of passengers.

Translink and the Public Transport Companies engage other companies as Processors/Subprocessors to perform services, for example to manage the systems on which the beta OVpay app runs, payment service providers, cloud and hosting parties, IT service providers and research and consultancy firms. Translink and/or the Public Transport Companies have concluded contracts with these companies because they have access to your data when performing these services. The contracts contain clear arrangements, covering aspects such as confidentiality, so that we can be sure that your data will be used only for the purposes stated in point 4 below. We have also implemented technical and organisational measures to protect personal data.

Translink and the Public Transport Companies do not sell personal data to other parties for marketing, sales and other business-related activities. We also will not give your personal data away for these purposes.

In some cases, Translink or a Public Transport Company is required by law to provide your data to third parties. For example, Translink must legally provide data in the event of a criminal prosecution. We provide data to third parties only if they make a formal demand and only if that demand complies with legal requirements. Translink also provides information to the police and the judiciary in relation to missing persons because we believe this is in the social interest.

4. Why do we process personal and other data when purchasing self-service through the beta OVpay app?

We process personal and other data to be able to perform the agreement that you enter into with us. You do this when you agree to the conditions for use of the beta OVpay app. You and Translink enter into an agreement so that you can create a My OVpay account through the beta OVpay app and purchase self-service. You can consult your Travel and Payment information through your My OVpay account for up to 18 months after you have checked in and out with your Payment Card on public transport. When you purchase self-service through the beta OVpay app, no automatic decisions with legal effect are taken based on your personal data.

If you do not want Translink and the Public Transport Companies to process your personal data for the My OVpay account in the beta OVpay app, we recommend that you do not download or use the beta OVpay app. To consult your Travel and Payment Information, you can then use the limited self-service through the website reisoverzicht.ovpay.nl.

After installing the beta OVpay app on your mobile phone, the available self-service consists of these basic components:

- creating your personal My OVpay account;
- downloading the beta OVpay app conditions for use and privacy statement;

- changing your password because you have forgotten it or for another reason;
- being able to log in and out of your personal My OVpay account;
- adding and removing one (1) Payment Card to/from your personal My OVpay account;
 - your personal account continues to exist after you remove a Payment Card;
- terminating your personal My OVpay account;
- providing feedback on the functioning of the beta OVpay app;
- being notified of changes to the beta OVpay app conditions for use and/or privacy statement;
- being redirected to the OVpay.nl/en website for more background information, to view frequently asked questions and/or to submit a request for help/complaint.

You can use these self-services in your My OVpay account:

- viewing the journeys you have made after you have checked in and out with your Payment Card on public transport;
- viewing the payments you have made after you have checked in and out with your Payment Card on public transport;
- viewing your outstanding amount when you have checked in and out with your Payment Card on public transport, after the amount for which you travelled could not be debited from your account or spending limit.

Pseudonymised processing of personal data for improvements to the beta OVpay app

Translink collects data to monitor, research and improve the beta OVpay app and its use. This is always done in pseudonymised and aggregated form. This means that we can no longer trace the data and insights we derive from them to an individual. We do this on the basis of compatible use for statistical purposes.

Specifically, we measure the following in the beta OVpay app:

- number of times a button/item has been pressed;
- number of times a page has been opened (navigation);
- number of errors that occur, both technical and functional.

5. Who are the Controllers for processing your personal data?

For the beta OVpay app, we assume two processing operations: creating and managing your personal My OVpay account and using self-service through your My OVpay account. For both processing operations, Translink and the Public Transport Companies (Arriva, EBS, GVB, HTM, Keolis, NS, Qbuzz, RET and Transdev) are the joint Controllers for processing your personal data when you use the self-service options in your My OVpay account, as referred to in point 4.

6. Which personal data do we process if you purchase self-services through the beta OVpay app?

The table below provides an overview of the personal data we process if you use self-services in your My OVpay account in the beta OVpay app.

Self-service	Personal data
Installing the beta OVpay app on your mobile device	None
Viewing and accepting the conditions for use and privacy statement	None
Creating your personal My OVpay account	Email address, password
Downloading the conditions for use and privacy statement	None
Changing your password because you have forgotten it or for another reason	Email address, password

Being able to log in to your personal My OVpay account	Email address, password
Being able to log out of your personal My OVpay account	None
Adding one (1) Payment Card to your My OVpay account	Service Reference ID and transaction amount associated with a payment for your journey, for which you checked in and out using your Payment Card
Removing one (1) Payment Card from your personal My OVpay account	None
Seeing when you have checked in and out, your journeys and journey details	Date of travel, check-in time, check-out time, check-in station/stop, check-out station/stop, travel costs (amount), type of token used to travel (Payment Card), mode of transport (type of vehicle), carrier
Viewing payments and payment details for journeys made	Transaction amount, transaction date, journeys made, costs per journey, check-in time, check-out time, check-in station/stop, check-out station/stop, token type used for the journey (Payment Card), Service Reference ID, Mode of Transport (type of vehicle), carrier
Terminating your personal My OVpay account	Email address

Providing feedback on the functioning of the beta OVpay app	Installed beta OVpay app version, phone brand (Apple, Samsung, etc.), device type, operating system type including version number
Being notified of changes to the beta OVpay app conditions for use and/or privacy statement	None
Seeing if and why my contactless Payment Card has been blocked for checking in and out on public transport	Amount of outstanding balance, transaction date, journeys made, costs per journey, check-in time, check-out time, check-in station/stop, check-out station/stop
Being redirected to the OVpay.nl/en website for more background information, to view frequently asked questions and/or to submit a request for help/complaint.	None

Travel and Payment Information

If you check in and out with a Payment Card on public transport in the Netherlands, the relevant Public Transport Company with which you travel is the Controller, along with Translink, for processing your Travel Information and Payment Information. Translink and the Public Transport Companies make these data available to you through your My OVpay account in the beta OVpay app. The carriers' contact details can be found on the website [OVpay.nl/en/over-ovpay/public-transport](https://www.ovpay.nl/en/over-ovpay/public-transport).

Recording customer service calls

If you call us or if our customer service team calls you, we record telephone calls for quality purposes. The recorded calls are kept for a period of three months.

7. How long are your personal data retained?

Translink retains personal My OVpay accounts in the beta OVpay app that are no longer in use for a maximum of 18 months. After this period, the personal data are erased and the personal data will no longer be available in your OVpay account. Our customer service can no longer answer questions about your personal My OVpay account after this period.

NOTE: Your Travel Information and Payment Information are retained in Translink's General Back Office for a maximum of 18 months. Your Travel Information and Payment Information are not stored in your My OVpay account and/or the beta OVpay app but are only retrieved from Translink's General Back Office to be shown to you in your My OVpay account.

8. What are your rights under privacy legislation?

You have the following rights concerning your personal data under the General Data Protection Regulation (GDPR):

- right of access
- right to rectify your data
- right to be forgotten
- right to object
- right to data portability

Right of access

Under the right of access, you can ask which of your personal data are being stored and why they are being used. If you wish to use this GDPR right, please email your request to privacy@ovpay.nl. Your Travel and Payment Information can be accessed in the beta OVpay app.

Right to rectify your data

You have the right to have your personal data rectified if it is incorrect. You have the option to alter your data in the beta OVpay app yourself. If you wish to change your login name for the beta OVpay app (email address), you can open a new personal My OVpay account with a new email address.

Right to be forgotten and right to object

You have the right to the removal of your personal data. You can delete your account and personal data yourself by terminating your personal My OVpay account in the beta OVpay app.

Right to data portability

You have the right to receive your personal data that Translink processes in a structured, commonly used and machine-readable format. In this way, you can easily transfer these data to another organisation offering the same type of service.

9. Contact

If you have questions or a complaint about privacy after reading this privacy statement, please contact us at privacy@ovpay.nl. We are here to help you!

If you would like more information about how we deal with your personal data, you can contact Translink's Data Protection Officer (DPO) at FG@translink.nl or by post at Trans Link Systems BV, attn. the Data Protection Officer, PO Box 1808, 3800 BV Amersfoort.

You also have the right to submit your complaint about privacy directly to the Dutch Data Protection Authority, P.O. Box 93374, 2509 AJ The Hague.