

RATP Dev UK
PRIVACY NOTICE

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1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe. We know that there's a lot of information here, but we want you to be fully informed about your rights, and how RATP Dev UK uses your data. We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

2. Explaining the legal bases we rely on

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

Consent

In specific situations, we can collect and process your data with your consent. When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

Legal compliance

If the law requires us to, we may need to collect and process your data.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

3. When do we collect your personal data?

- When you visit our website.
- When you engage with us on social media.
- When you contact us by any means with queries, complaints etc.
- When you ask us to email you information about a product or service.
- When you comment on or review our products and services.
- When you report lost property.

- Any individual may access personal data related to them, including opinions. So if your comment or review includes information about who provided that service, it may be passed on to them if requested.
- When you've given a third party permission to share with us the information they hold about you.

4. What sort of personal data do we collect?

- Details of your visits to our websites and which site you came from to ours.
- Information gathered by the use of cookies in your web browser.
- Your comments and reviews.
- Your image may be recorded on CCTV when you travel in our vehicles or visit our premises.
- To deliver the best possible web experience, we may collect technical information about your internet connection and browser, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered.

5. How and why do we use your personal data?

- To respond to your queries and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest.
- To protect our customers, premises, assets, vehicles and us from crime, we operate CCTV systems on our premises and vehicles which record images for security. We do this on the basis of our legitimate business interests.
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim is to protect the individuals we interact with from criminal activities.
- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice. If we do not use your personal data for this purpose, we would be unable to comply with our legal obligations.
- To comply with our contractual or legal obligations to share data with law enforcement.

For example, when a court order is submitted to share data with law enforcement agencies or a court of law

6. How we protect your personal data

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it. We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

7. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

8. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties and our subsidiaries. *For example, to handle complaints and so on.*

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify. We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- IT companies who support our website and other business systems.

Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.
- We may, from time to time, expand, reduce or sell RATP Dev UK and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

- For further information please contact our Data Protection Officer.

9. Cookies

We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies and other such software on our website contain information that is transferred to your computer's hard drive. They help us to improve the website and to deliver a better and more personalised service. Find out more about our cookies.

This includes, but is not limited to:

- Your IP address
- Your operating system
- Your browser type
- The name of your internet service provider
- The date, time and duration of your visit
- The name and URL of pages you access

The purpose of this is for system administration. This contains statistical data about our users' browsing actions and patterns, and does not identify any individual.

The website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access the website.

10. Where your personal data may be processed

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow at all times. If you wish for more information about these contracts please contact our Data Protection Manager (sahra.choudhri@ratpdev.com).

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

11. What are your rights over your personal data?

An overview of your different rights

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- Review by us of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision).

You have the right to request a copy of any information about you that we hold at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact our IT department via servicedesk@ratpdev.com.

If we choose not to action your request we will explain to you the reasons for our refusal.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

12. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.
Or go online to www.ico.org.uk/concerns

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

13. Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Manager who will be pleased to help you:

- Email us at sahra.choudhri@ratpdev.com

This notice was last updated on 24 May 2018