

Transdev Privacy Statement

14 October 2024

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1. Who are we?

Transdev Nederland Holding N.V. (Transdev) is one of the largest mobility companies in the Netherlands. From buses, trains and taxis to ambulances and even self-driving shuttles, our vehicles can be found across the country. We operate with various companies and well-known brands such as Connexxion, Hermes and Witte Kruis. All references to Transdev in this privacy statement are references to all these companies and brands jointly.

For a list of the most active Transdev companies and brands, click 'Read more' below.

This privacy statement explains:

- What personal data of yours is processed when you use Transdev's services and/or visit one of our websites.
- For what purpose Transdev processes these personal data.
- Your rights with respect to the processing of your personal data.

In order to present the information as clearly as possible, each topic has been subdivided into two layers of information. You will first get the most important information.

Read more

Transdev is the point of contact for all processing of personal data, which Transdev processes from you. According to the General Data Protection Regulation (GDPR) and the Dutch Police Data Act [Wet politiegegevens, 'Wpg'], Transdev is the data controller. When paying for your travel using a OV-chip card, debit card, or credit card, Transdev and Translink are joint data controllers with respect to the processing of personal data.

Transdev operates a number of various companies and brands, providing transport services under brand names such as Connexxion, Breng and Bravo. We also provide transport services under our own name, Transdev. Under the brand name Bravo, Transdev and Hermes (a Transdev subsidiary) provide bus services in Brabant together with another operator .

The names of the companies and brands are subject to change over time as public transport contracts expire and new public procurement procedures for these contracts are initiated. Transport services are also provided under brand names owned by regional transport authorities, such as Breng in the Arnhem-Nijmegen region. The transport provider's name will then not be visible on the equipment and is not feature in the timetable or prominently on the website either.

If you are unsure whether you travelled on a Transdev (subsidiary) service, you can always check with our Customer Service.

Transdev operates the following and other entities and brands:

- Connexxion Openbaar Vervoer N.V.
- Connexxion Taxi Services B.V.
- Breng
- Hermes Openbaar Vervoer B.V.
- Bravo
- RRReis
- Overall
- Texelhopper
- OV Regio IJsselmond

- ParkShuttle
- WijZijnTransdev
- Witte Kruis.

Witte Kruis has its own privacy statement, which is available here: <https://wittekruis.nl/privacy-policy>

Personal data processing by Translink and the Dutch public transport operators¹ jointly for the purposes of providing the OVpay services is governed by the EMV (Europay, Mastercard, Visa) privacy statement. For more information, see [OVpay Privacy Statement](#).

2. When do we process your personal data?

This privacy statement applies to all personal data, which Transdev processes from you. Organisations may only process personal data if there is a legal basis for doing so. Transdev always processes personal data on one of the following bases:

- For the performance of a contract;
- To comply with a legal obligation;
- Because Transdev has a legitimate (business) interest. If processing is done for Transdev's legitimate interest, it is done in a way that does not (excessively) harm your interests or fundamental rights and freedoms;
- In cases where you give Transdev permission to process your data for one or more specific purposes.

Below are the most common situations in which we process your data: :

- For the performance of the contract of contract of transport and its financial settlement. This includes when you buy our products and subscriptions (i.e. the different pricing plans for travel on public transport based on when and how often you travel);
- For contact with Transdev, by phone, email, chat, app, Social Media, contact form, questionnaires, competitions, (panel) surveys or when you use one of the 'Mijn Transdev' platforms²;
- If you have consented to receive information about (new) Transdev products and/or services. You can always withdraw your consent using the unsubscribe link included in each newsletter or email;
- For (internal) analysis of:
 - process improvement;
 - capacity utilisation, planning and deployment of equipment;
 - product and service development;
 - market research;
 - historical, statistical purposes;
 - quality assurance purposes.
- To process and return lost and found property;
- To handle questions and complaints about Transdev and to solve any disputes between you and Transdev;

¹ Arriva, Connexion, EBS, GVB, HTM, Keolis, NS, Qbuzz and RET.

² My Transdev - <https://mijn.transdev.nl/login>

My Connexion - <https://mijn.connexion.nl/login>

My Hermes - <https://mijn.hermes.nl/login>

Schiphol area - <https://schiphol.connexion.nl/login?redirect=/>

My HWGO - <https://scholenhwgo.connexion.nl/login?redirect=/>

- To improve the safety of passengers and employees and protect the property of Transdev, employees, suppliers and passengers;
- To perform enforcement and investigative tasks by special investigating officers.

Read more

Tickets

You need a valid ticket to travel by bus or train. Depending on the type of ticket, we process personal data. This is the case if you purchase a Transdev subscription and in certain cases also when you purchase barcodes (E-ticket). When you pay for your travel using a OV-chip card or OVpay, personal data are processed for you to be able to travel.

When checking in and out on public transport, transaction data are generated and read electronically. We use these data to settle your travel transactions.

The processing of transactional data of OV-chip card or OVpay is carried out by Trans Link Systems B.V. You can check the transaction data of your OV-chip card in your transaction overview. On ovpay.nl/reisoverzicht, you can see where you checked in and out each day with your debit card or credit card.

Special transport services

In various regions of the Netherlands, Connexxion Taxi Services provides special transport services for people with special needs. There are various forms of special transport. It is the responsibility of a local authority or the national government to make sure special transport services are available.

The following forms of special transport come under the local authority's responsibility:

- Transport provided under the Social Support Act [Wet maatschappelijke ondersteuning, 2015]: This legislation provides citizens with access to mobility-related resources and facilities. When it comes to transport facilities, this legislation distinguishes between individual facilities, such as a wheelchair and mobility scooter, and collective transport facilities, such as the regional taxi. Transport provided under the Social Support Act is available only to people with a special Indication, issued by the local authority.
- Travel to and from someone's place of supported employment (previously provided under the Exceptional Medical Expenses Act [Algemene wet bijzondere ziektekosten], currently provided under the Social Support Act).
- School transport: School transport is transport to and from educational institutions for primary and secondary education. The target group for this form of transport consists of pupils and students in special education or pupils and students who cannot attend regular education in their immediate neighbourhood.
- Transport provided under the Youth Act [Jeugdwet]: Provided under the Youth Act since 2015, transport as part of youth services concerns transport for young people to and from supported employment or facilities for short-term stays.
- Transport provided under the Participation Act [Participatiewet]: On 1 January 2015, the Supported Employment Act [Wet sociale werkvoorziening] was transferred into the Participation Act. It covers transport for people with an occupational disability from and to their work.

Furthermore, there are forms of special transport that are operated by other authorities and are funded by the state:

- Valys: Valys is a taxi service created for interregional transport of a social and recreational nature. While transport provided under the Social Support Act is capped to five zones, Valys provides transport for five zones or more. This kind of transport is not provided by us.
- Transport to and from work provided under the Work and Income according to Labour Capacity Act [Wet werk en inkomen naar arbeidsvermogen]
- Transport to and from vocational training courses (WOOS).
- Transport provided under the Long-Term Care Act [Wet langdurige zorg] to supported employment or day treatment.

Finally, there is seated patient transport. This concerns transport by car (the patient's own car or a taxi) or public transport to institutions or practitioners for treatment. This transport is covered by the health insurance of the person concerned.

Police Data Act

Want to find out where you can catch your bus? Have a question about tickets? Our colleagues at Service and Security are ready to assist our passengers day and night. All these colleagues are also certified special investigating officers and have completed special training to also maintain peace and security in and around our vehicles.

When a special investigating officer processes personal data in the performance of their investigative duties, such processing is governed by the Police Data Act instead of by the General Data Protection Regulation (GDPR). We will treat processing of personal data by special investigating officers under the Police Data Act separately from all other personal data processing.

3. What personal data do we process?

When you use any of our services, we ask you to submit your personal data. Transdev mainly processes general personal data. This includes your name, contact details and date of birth. If it is necessary for Transdev to be able to provide its services, we also process special category data, such as medical data. The latter happens, for example, when providing transport services for pupils and students in special education.

Read more

We process personal data for the provision of our services. Please find below a list of the kinds of data we may process. Bear in mind that this does not mean that we need all these data for all our services. We only process data that we need in order to provide the service in question. The data may include:

General personal data

- Contact details: Name, address, town/city, telephone number, email address
- Date of birth
- Gender
- Respondent number
- Customer number, card number, form number
- Type of subscription/product, start date, purchase channel, duplicate history, OV-chip card number
- Complaint details, refunds, lost & found
- Transaction details, including check-in and check-out details
- Data on current/past transactions and additional data, such as navigation data, publications/brochures requested
- Data from direct contact to be able to check:

- What the contact was about (such as product, advice, offer, service call, message, complaint, information)
- When the contact was, with whom and via what medium (such as phone, post, chat, our website, email, newsletter, etc.)
- Financial data, bank/giro account number, payment method, payments made
- Employer contact details (if you have a subscription through your employer)
- Bank account number, payment method and debtor's data
- Data on the use of any of the apps of Transdev and its sub-brands
- Telephone calls recorded for quality assurance and training purposes
- Audiovisual data; if applicable and permitted by law, we record inside vehicles and depots using surveillance cameras and we record phone calls, video calls, and chat conversations with our customers. We may use such recordings in, for example, investigations into facts of incidents or for training purposes.

Special category data

- Data concerning health.

Personal data on children

We will only collect data on children when they use a Transdev service or when parents/guardians submit information about children in relation to their child's travel product. We always ask parents/guardians for consent for such processing when we are required to by law.

Other personal data

- Citizen service number [Burgerservicenummer (BSN)], only if we have a legitimate ground for it.
- Data on a criminal offence in the context of an investigation by a special investigation officer.

4. How we obtain your data?

After explaining in the previous what personal data Transdev processes, this section will go into how we obtain these data. Usually you submit these data yourself directly on our website, by email, or over the phone. In case of business services, we generally obtain the data through your employer or client.

Read more

We collect your personal data in the following ways:

- You share your personal data with us when you become a customer of ours, fill in a form online, sign a contract with Transdev, use our services, contact us using one of our communication channels or visit our websites.
- Your organisation or company becomes a customer or is an existing customer, and your personal data has been provided to us to enable us to contact your organisation or company and provide our services.
- Transdev uses apps to provide some of its services. To ensure the proper functioning of an app, Transdev may request permission to access and process certain personal data upon installation. Collecting and processing these personal data through apps is also governed by this privacy statement.

5. Why do we process your personal data?

Transdev processes personal data for the following purposes:

- a) Provision of our services

- b) Risk reduction and security
- c) Performance of marketing activities
- d) Product and service improvement
- e) Compliance with legal obligations

Read more

a) Provision of our services

We use your information, such as name and contact details, when you enter into a contract (of transport) with us or when we need to contact you. We also use your data in keeping (financial) records, such as to send an invoice for services provided.

b) Risk reduction and security

Special investigating officer

In order to enforce public safety in and around public transport facilities, Transdev employs special investigating officers. Being the employer of these special investigating officers, Transdev is responsible for any personal data processing operations performed by these special investigating officers. Some of the personal data processed by special investigating officers are governed by the Police Data Act instead of the General Data Protection Regulation. If so, the lawful basis for processing is the performance of a legal obligation, namely the daily police task (Section 8 of the Police Data Act).

Special investigating officers check at stations and on buses and trains whether passengers hold a valid ticket. In addition, special investigating officers also maintain order and security, and ensure compliance with legal provisions. Special investigating officers respond to violations. They can also assist the police in their investigative duties. When special investigating officers processes personal data as part of their investigative duties, the Police Data Act applies. All other cases of personal data processing are governed by the General Data Protection Regulation (GDPR).

Video surveillance

For the safety of passengers, employees and property, Transdev uses cameras – focused on publicly accessible areas – on its vehicles, in buildings and on sites, as well as for surveillance by humans and enforcement by special investigating officers (bodycam). Recordings by these cameras are used to protect persons and property. If necessary, we use these recordings for investigative purposes or as evidence in case of damage and associated claims.

Recordings made are only viewed after a criminal offence, accident or nuisance-causing behaviour or event ('incident') has been reported. If necessary, the recordings are used for follow-up actions, such as: (internal or external) accident analysis, for insurance purposes, for investigation, for reporting to the police and for detection or as evidence in case of damage and related claims.

In the event of an incident, Transdev may, within the boundaries of the law, share video surveillance footage with the police and judicial authorities to support the reporting and/or investigation of a criminal offence. If necessary, Transdev uses the recordings as evidence when substantiating and/or defending against legal claims. The recordings may be provided to insurance agents and/or external lawyers.

Camera recordings are kept for a maximum of seven days. If Transdev secures recordings for the purpose of investigating an incident, the relevant recordings will be kept longer. Secured recordings are destroyed after the final resolution of an incident.

c) Performance of marketing activities

We regularly ask your opinion on our services. Any feedback you provide may be shared with employees to improve or to customise our services to your needs. We do this to build and/or to maintain and expand our relationship with you, as well as for statistical and scientific purposes.

We can also send you newsletters with information about our services. Of course, you can object or withdraw your consent if you no longer wish to receive these special offers.

d) Product and service improvement

We process your personal data to continuously improve our mobility services and to help our management in making decisions about our activities and services. By analysing the way you use our mobility services, we gain insight into your travel behaviour and are able to find out how and where we can improve. For example: if a bus on a certain route gets very crowded with people at certain times, this may prompt us to deploy a different type of bus with more capacity on that route.

e) Compliance with legal obligations

We process personal data to comply with various legal obligations and requirements. When we want to process your personal data for a purpose other than the ones described above, we will seek your explicit consent. You are free to withhold consent or withdraw your consent later.

6. How long do we store your personal data?

The basic principle is that we never store your personal data longer than necessary. In some cases, the law stipulates exactly how long we may or must store data. If you have taken out an annual subscription, your personal data will be processed in our subscription administration. As required under the Dutch General Tax Act [Algemene Wet inzake Rijksbelastingen], these data are retained for seven years.

In other cases, we ourselves determine on the basis of necessity and reasonableness how long we need your data. We have drawn up a retention period policy for this purpose. How long personal data are retained differs per situation and also depends on the purpose of storage. The retention period can range from a few weeks to many years. Travel transaction data, i.e. data generated resulting from the use of the OV-chip card, will be stored for 18 months.

For more information about specific retention periods, please contact us.

7. To whom do we transfer your personal data?

Transdev only transfers personal data to third parties if permitted or required by law, and when necessary for Transdev's business operations.

Transdev will, for example, transfer your personal data to the [Central Judicial Collection Agency](#) [Centraal Justitieel Incassobureau (CJIB)] if you fail to pay a fine. Transdev may also transfer data to investigative authorities, such as the police and the Public Prosecution Service, for the investigation and prevention of criminal offences.

Transdev and the other public transport operators aim to make public transport as efficient and effective as possible. For that, we need insight into passengers' travel patterns. We gain the required insight through statistical analyses of travel behaviour, known as 'information management.' To conduct this research, we only use transaction data and not customer data such as name or date of birth. The terms for this are laid down in a collaboration agreement.

We process your personal data in the Netherlands or the European Economic Area³ (EEA) as much as possible. In some cases, we may transfer your personal data to countries outside the EEA. If countries do not offer an adequate level of protection, we provide appropriate safeguards together with the parties we share the data with. These safeguards include using standard contracts specifically developed for this purpose by the European Commission.

Read more

Legislation and regulations may require Transdev to transfer personal data to bodies designated to do so by law. For example, the Dutch Tax and Customs Administration, which has to receive data for subscription holders' income tax return or in the context of audits and accountability.

Moreover, Transdev is obliged to cooperate and provide personal data when requested by investigative authorities, such as the police and the Fiscal Intelligence and Investigation Service (FIOD). Before sharing the data, we carefully assess whether the investigative authority in question is indeed authorised to receive the data.

Transdev may also provide personal data to the police or judicial authorities on its own accord, such as to protect our rights and properties. We may also use personal data in legal proceedings or procedures before the Public Transport Disputes Committee [Geschillencommissie Openbaar Vervoer] to support our case. For research into traffic safety under the *Local Rail Act* [Wet lokaal spoor], the Human Environment and Transport Inspectorate [Inspectie Leefomgeving en Transport] (i.e. the industry regulator) receives research analyses sometimes that may contain personal data.

Processors

Whenever Transdev engages a third party to have personal data processed, we enter into a separate data processing agreement with the processor. A data processing agreement stipulates what the processor can and cannot do with the personal data and what happens to the personal data when the processing operation has been completed. In these cases, Transdev remains responsible for the personal data. For example, a research agency processes the customer surveys we conduct. Thus, we have signed a data processing agreement with this firm.

Transparent Information Management

All public transport operators in the Netherlands and the government aim for transparent, supply-oriented information management in public transport. For an overall view of all public transport information, travel and transaction data collection has been centralised to the greatest degree possible. This is what we refer to as Transparent Information Management. This data is collected and stored by Trans Link Systems BV⁴ (Translink). Since 1 January 2016, all public transport operators have been members of the Cooperative of Public Transport Operators [Coöperatie Openbaar Vervoerbedrijven]. Together, these operators own Translink, while all public transport operators and Translink are jointly designated as the data controllers for the processing of personal data for the Transparent Information Management.

Transparent Information Management identify travel patterns to support policy development and decision-making. The aim is to optimise the mobility system in the Netherlands. Within overall mobility, the focus is on promoting efficient and effective public transport and optimised services to passengers. To this end,

³ All EU countries plus Iceland, Norway and Liechtenstein.

⁴ <https://www.translink.nl>

information about public transport is used to make statistics. This information consists exclusively of transaction data; it does not contain customer data such as your name or date of birth.

Transaction data are generated when you check in and out on public transport using your OV-chip card or debit card. You can check your transaction details in the transaction overview of your OV-chip card (on Mijn OV-chip on the OV-chipkaart.nl website), in the OVpay app, or on the OVpay website.

Transaction data used for statistical analysis are pseudonymised. When we pseudonymise data, we encrypt identifying characteristics, to ensure the transaction data cannot be traced back to a person without additional information. After data is pseudonymised, Translink converts the data into analysis files. These are sets of statistical data that do not contain personal data. These aggregated, statistical analysis files can be used to create information products that, for example, identify trends in passenger flows. This allows us, for example, to determine where new public transport links are needed. Pseudonymised transaction data are retained for a maximum of 18 months after the trip made.

We may forward such information to government bodies and third parties that are tasked or conduct activities relating to (public) transport and improving services to passengers. The information do, therefore, not contain personal data and are exclusively shared:

1. with public transport providers and government bodies, on the basis of performance of the contract with the passenger;
2. with scientific institutions, on the basis of a legitimate interest;
3. with knowledge institutions, on the basis of a legitimate interest;
4. with parties with a commercial purpose, on the basis of a legitimate interest;
5. the public, on the basis of a legitimate interest.

There is a single point of contact to handle questions about the processing of your personal data for the purposes of compiling analysis files and information management. You can contact Translink for this through privacy@ov-chipkaart.nl or privacy@ovpay.nl. You can also contact Translink to exercise your data protection rights.

8. Your data subject rights

The General Data Protection Regulation gives you the right to:

- access your personal data;
- rectify your personal data;
- erase your personal data;
- restrict the processing of your personal data;
- transfer your personal data to another service provider.

You also have a right to object to the processing of your personal data and to lodge a complaint.

While the Police Data Act also gives you these same data protection rights, it does contain more restrictions and exceptions than the General Data Protection Regulation. When exercising your data protection rights under the Police Data Act, we will take these restrictions and exceptions into account.

Read more

In some cases, you can exercise your rights through your *Mijn Transdev* account⁵. If not, submit a request by sending an email to: fg@transdev.nl or a letter to:

Transdev
Attn: The Data Protection Officer
Privacy department
PO Box 224
1200 AE Hilversum, Netherlands

Your email or letter must provide the following information:

- State the legislation you are invoking, i.e. the GDPR or the Police Data Act [Wet politiegegevens].
- Describe the personal data you want to access, rectify, or erase. Or describe the personal data that you do not want to be processed.
- Your name, address, telephone number, email address, date of birth, and signature.
- You can also have someone else submit the request on your behalf, albeit you will be required to authorise this person first. The parents or legal guardians of children aged under 12 do not need authorisation to submit requests on their child's behalf. When acting on behalf of children aged between 12 and 16, authorisation from the child is required. Those over the age of 16, decide independently on the exercise of their rights. When submitting the request, include a copy of the passport of the authorised person and a signed authorisation. State which data protection and privacy right you want to exercise.

Before Transdev processes your request, Transdev must verify your identity. With this, we prevent others from gaining access to your data. In order to establish your identity, we may ask you to provide us with additional information. In some cases, a copy of your identity document is needed to verify your identity. If so, you're allowed to shield your photo and Citizen Service Number (BSN). You can read how to make a safe copy of your identity document on the [website](#) of the central government. The copy of your identity document is only needed to check your identity and will be removed after verification. Would you rather not send a copy of your identity document? Then you can visit Transdev to show your proof of identity. In that case a copy is not required.

Transdev will assess your request and send a response within one month of receiving your request. In our response, we will let you know how we will grant your request. If we reject your request, you will receive a notice explaining the reason for rejection. If the request turns out to be a complex one or concerns a large number of requests submitted all at once, we may extend the processing time from one month to two months. If so, we will notify you within one month of receiving your request.

In handling your request, we will process your contact details and additional data relating to your request. The details of your complaint or request to exercise your data subject rights and the data required to handle your complaint or request will be retained for a maximum of one year after the calendar year during which it was handled. After that, they will be deleted.

⁵ My Transdev - <https://mijn.transdev.nl/login>
My Connexion - <https://mijn.connexion.nl/login>
My Hermes - <https://mijn.hermes.nl/login>
Schiphol area - <https://schiphol.connexion.nl/login?redirect=/>
My HWGO - <https://scholenhwgo.connexion.nl/login?redirect=/>

Description of data subject rights

Right of access

This is the right to access the personal data that Transdev holds about you. Transdev reserves the right to (partly) refuse to grant you access if such access harms someone else's privacy. Family members do not have a right to access the personal data of a deceased next of kin.

Right to rectification

If you think your personal data are not or no longer accurate or complete, you can submit a written request to Transdev asking to have your personal data updated. If we do not proceed to rectify the data after receiving such a request, we will give you a clear explanation why we do not do so. Certain data are easy to rectify or add yourself on your Mijn Transdev account. For data that is not available in your account, you can submit a rectification request. We will make sure third parties to whom we have transferred your personal data also rectify your personal data.

Right to erasure

You can ask Transdev to erase (part of) your personal data. If we do not proceed to erase the data in question, e.g. because we are required by law to retain certain personal data for a certain period of time, , we will provide a detailed explanation to why we are not allowed to erase the data.

9. Social media

You can choose to contact us on our social media channels such as:

- Facebook
- LinkedIn
- Twitter
- WhatsApp
- Instagram

If you get in touch with us through on one of these channels, we will store the data you send us via these channels. In order to be able to respond to personal questions in a social media message, we will ask you in a personal message (direct message or email) to share your contact details with us. This will allow us to confirm that we are talking to the right person.

Read more

This privacy statement governs the personal data we receive from you via these channels. The use of social media is your own responsibility. This privacy statement does not apply to how social media platforms handle the personal data you provide to them. For more information about how these social media channels process your personal data, we recommend that you consult their respective privacy statements.

10. Automated decision-making

Transdev does not use automated decision-making without human intervention.

11. Modifications to this privacy statement

Legislation and regulations on privacy and data protection are dynamic. As a result, we regularly amend this privacy statement to keep it up to date with the latest legislation and regulations. We will amend this privacy statement as and when necessary to adapt it to new developments, such as when there are changes

to our business activities, amendments to the law or changes in case law. The privacy statement published on www.transdev.nl is always the latest version.

This privacy statement was last amended on 14 October 2024.

12. Questions, complaints and contact

If you have any questions about this privacy statement, please contact our Data Protection Officer by email on fg@transdev.nl.

If you have a privacy-related complaint, please contact us by filling and submitting the [complaint form](#) on our website. Alternatively, you can send a letter to:

Transdev
Attn: The Data Protection Officer
Privacy department
PO Box 224
1200 AE Hilversum

Visiting address: Stationsplein 13, Hilversum
Tel.: +31 (0)88 625 16 00

If you are not satisfied with our response to your complaint, you can also lodge a complaint with the Dutch Data Protection Authority. You can do that on their website: www.autoriteitpersoonsgegevens.nl/en