

## Introduction

Sussex Coaches is committed to protecting and respecting your privacy when you use our services.

This Privacy Policy explains:

- What personal data we collect from you when you use our websites, visit our depot, contact us or use our services, or WiFi;
- How we will collect and use that information;
- How we keep information secure; and
- How you can contact us if you wish to exercise any of your rights in relation to the information or make a complaint.

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The data controller is::Sussex Coaches whose registered office is Sailors Cross, Green Street, Shipley, West Sussex, RH138PB

Our Data Protection Manager is: Lyndi Reading

You can contact the Group Data Protection Officer as follows:

In writing to, Sailors Cross, Green Street, Shipley, West Sussex, RH138PB Or by e-mail: [lyndi@sussex-coaches.co.uk](mailto:lyndi@sussex-coaches.co.uk)

More information about the Data Protection Act can be found on the Information Commissioners Website <https://ico.org.uk/>

The Information Commissioner is our regulator for data protection matters.

## Information we may collect from you

We may collect and process information about you when you: buy tickets, travel on our services; use our website, or WiFi; buy a product from us or make a sales enquiry; or contact the office

We collect information such as your contact details, ticket purchases, bus stops visited (for example for charging the correct fares on smartcards), payment and refund details. We may require additional details for some services, such as photographs for ID, or your age for age restricted tickets. This information is generally provided by you.

Sometimes we obtain details from third parties, for example on accepting a private hire booking via an agent or agency.

## How we use your information

We will only use the information you provide as permitted by the Data Protection Law. Depending on how you contact us, use our services, the consent you have given, our legitimate interests, or legal obligations we may have, this will include:

- To provide you with the service, but sometimes the data is also used for our legitimate interests of customer service, health and safety, improving our services and other legal obligations, like providing information to our regulators.
- To provide you with details of our services and information about travelling, and customer service (this is based on our legitimate interests, to run bus and associated services. Sometimes it is part of our contract or our other legal obligations)
- To run our services and improve them. Some of these things are also covered in our legal obligations, not just to customers, but under Local Authority contracts, the Department for Transport or Regulators.
- For your safety and security.
- For fraud and crime prevention.
- To enhance your experience of our website, as described in our cookie policy.

We may also be required to pass certain customer data, to a successor business, local authority or Department of Transport.

### **Our Legitimate Interests**

Running our business in a safe and socially and environmentally responsible manner, to provide sustainable and quality, locally focused passenger transport services, improve and expand our services, be a conscientious employer in the transport sector, investing in and developing our colleagues, operating with financial discipline and integrity

### **Sharing or disclosure of your information**

We will only share or disclose your information as set out in this Policy or in accordance with Data Protection Law and will obtain your consent where we are required to do so.. We may share or disclose information for the following reasons:

- To respond to your complaints or administer requests you have made, either to us or another regulatory body, appeals service, or local authorities and contract partners;
- To process payment card transactions;
- To comply with requests from the police or other law enforcement agencies for the purposes of crime prevention or detection. These are dealt with on a case-by-case basis
- To comply with other legal obligations for example, relating to crime and taxation purposes or regulatory activity;
- To protect our legitimate business interests, for example, for fraud prevention or revenue protection; and
- If you have agreed to receive information for competition, promotion, survey or research purposes, we may share your contact details with a limited number of parties, but only for the reasons you have agreed to in the terms and conditions of the purpose.
- Where there is a Safeguarding Concern.
- We have a policy in place for one off sharing of data, such as a request from an insurance company.

You can find out more below about the information we collect and how we use, share or disclose it.

Types of Information we collect

### **CCTV**

Camera systems we operate

Our CCTV is used to capture, record and monitor sound and images of what takes place at our depot, workshop, and on the inside and outside of our buses.

All of our CCTV system record as digital information. Cameras can be fixed or set to scan an area. In some circumstances, they can be operated remotely by controllers -at premises locations only.

Why we operate CCTV cameras

We operate CCTV for the following purposes:

- Health and safety of employees, passengers and other members of the public;
- Crowd management; and
- Prevention and detection of crime and anti-social behaviour
- Improve the customer service we provide

### Camera locations

We operate cameras at our depot and workshop, and on most of the buses and coaches that we run.

### Length of time CCTV footage is kept

Premises CCTV footage is recorded over on a continual basis we usually have access to a maximum of 31 days from the time of recording when it automatically overwrites. Vehicle CCTV footage is recorded over on a continual basis and subject (to vehicle usage) footage is retained for an average of 14-45 days before it is overwritten.

### How to access your CCTV personal data

You can request copies of images or footage of yourself by making a subject access request. The Subject Access Request section on this site explains the information you will need to provide

### Disclosing personal data to the police

At our discretion, we may disclose personal data in response to valid requests from the police and other statutory law enforcement agencies.

Before we authorise any disclosure, the police have to demonstrate that the personal data is necessary to assist them in the prevention or detection of a specific crime, or in the apprehension or prosecution of an offender.

Requests from the police are dealt with on a case-by-case basis to ensure that any such disclosure is lawful in accordance with the Data Protection Law.

### Sharing CCTV footage with other third parties

We may also disclose personal data to third parties, if required to by law or it is necessary for a legitimate purpose such as defending or bringing legal action. Where we operate specific school, services subsidised by schools or local government, we share CCTV with the relevant school for the health and safety of students and our employees as well as prevention and management of anti-social behaviour. Data Protection Law allows us to do this where the request is supported by:

- evidence of the relevant legislation; or
- a court order
- Satisfactory evidence and assurances of the legitimate interest.

Legitimate interest would include requests such as defending or making a legal claim, such as to insurers following a vehicle collision. When we are not required to provide CCTV, we will take into account the circumstances and any potential harm to individuals, we may also charge an administration fee and seek indemnity for any use beyond which it is requested.

### External guidelines and best practice

We operate our CCTV systems in compliance with the CCTV Code of Practice issued by the Information Commissioner's Office in 2014. The Code describes best practice standards which should be followed by organisations operating devices which view or record images of individuals. It also covers other information derived from those images that relates to individuals.

## Website visits and purchases

This section shows the information we collect when you use our website. Before providing us with your details, please read the following important information regarding:

- [Collection of visitor information](#);
- [Hyperlinks](#);
- [Cookies](#)

## Collection of visitor information

We will only use the information that we collect about you lawfully, in accordance with the Data Protection Law.

The details you provide about yourself and any other information which identifies you is held by on this website for operational purposes, for example processing payments.

## Hyperlinks

We may provide hyperlinks from this site to websites of third parties. No liability is accepted for the contents of any site operated by a third party which may be accessed via links from this site. These links are provided for your convenience only and do not imply that we recommend the content of such sites. We encourage our users to be aware when they leave our site to read the privacy statements of each and every website that collects personally identifiable information. This Privacy Policy applies solely to information collected by Sussex Coaches

## Cookies

A cookie is a small piece of information that is sent to your browser when you access a website. Cookies contain information about your visits to that website and the purpose of cookies is to enable our websites to remember you, and your browsing habits, when you visit it again in the future.

With most Internet browsers you can configure your browser so that it refuses new cookies, prompts you to accept cookies or disables cookies altogether. Exactly how this is done is dependent on the browser you use. To find out more about the cookies we use please visit our cookie policy.

As you may be aware, no data transmission over the Internet can be entirely secure. As a result, while we will always use reasonable endeavours to protect the personal information you provide to us, we cannot guarantee the security of your information and the use of our facilities (e.g. e-mail) is at your own risk. If you have any questions about paying for your ticket through the Site, please contact Customer Relations.

## Revenue Protection and Penalty Fares

### Personal details we hold

We may collect a range of personal detail during the course of revenue protection activity. This may include name, address, proof of ID, journey details, payment details, personal descriptions and other information you provide to support an appeal.

### How we use your personal data

We only use this information for the administration of the penalty fares scheme, collection of unpaid fares, fraud prevention and the prosecution of travel offences.

### Sharing data with third parties

We may share your correspondence with:

- British Transport Police under a data sharing agreement to prevent and detect crime.
- To operate a penalty fares scheme.

## Customer Relations

We collect your information and comments when you contact us by letter, email, web form, phone or social media.

## Personal details we hold

We may hold your name, address, email address, phone number, social media name, ticket details, Private hire bookings, and our correspondence with you, the compensation claims you have made and payment made by us, proof of journey or other supporting information you may provide.

## How we use your personal data

This information is used for administration of correspondence or processing claims you have made, such as delay repay as well as for fraud prevention purposes. We also use it to respond to complaints.

## Where We Store Your Personal Information

The information that we collect from you will only be stored in UK or other jurisdictions which are acceptable according to guidance provided by the Information Commissioner and/or where appropriate legal and security safeguards are in place.

## Information Security

We use a range of measures to safeguard access to and use of, your personal information and to ensure it retains its integrity and availability. These include structured access controls to systems, network protection, intrusion detection, physical access controls and staff training.

## Your Rights

Ask for a copy of your personal data

You are entitled to request a copy of the personal information we hold about you.

Please contact [info@sussex-coaches.co.uk](mailto:info@sussex-coaches.co.uk)

We may need to ask for some further information, such as checking who you are

We aim to get the information to you without undue delay and within 30 days. If we have any trouble with this timeframe we will let you know within 30 days and explain what the problem is. Sometimes we may hold information that we don't have to provide, for example it would prejudice a police investigation or contains someone else's personal data.

In most cases we provide the copy of your data to you for free.

## Rectification/Restriction

If you believe the information we hold about you is inaccurate or incomplete you can contact us and ask us to correct it.

We will provide a response confirming the action we have taken or disagree with taking within 30 days, or provide a response within 30 days if the matter is complex and a further time is needed.

## Deletion

This is also known as the "right to be forgotten", you can request deletion or removal of personal information in some circumstances, such as where there is no compelling reason for its continued processing.

We will provide a response to you without undue delay and within 30 days, confirming whether/what personal data we have deleted and/or explaining why we don't agree that some data does not need to be deleted.

### **How we deal with rights requests**

We will try to deal with your request without undue delay and at least within 30 days. In exceptional circumstances, we may need to extend the time to respond fully, if the request is particularly complex or there are multiple requests. But we will let you know within 30 days.

We are not able to charge you a fee for dealing with rights requests, unless they are manifestly unfounded or excessive or in circumstances where copies have been provided previously. We would always let you know if we thought this was the case, so that you can make a decision about what you wanted to do next.

There are various limitations and exemptions in relation to the exercise of rights in Data Protection Law - for example if it would affect another's rights and freedoms or if we need to retain the information to make or defend a legal claim. We intend only to rely on limitations and exemptions where it is fair to do so and always bearing in mind that it is your personal data.

### **Complaints**

If we don't respond to within 30 days of your request or you are not happy with our response you can lodge a complaint with the Information Commissioner Office or issue legal proceedings against us.

We also have a complaints policy. If you are not happy with the way in which we deal with your data or have dealt with a rights request, then please us know. Our Data Protection Managers are the first point of contact for dealing with Rights Requests and complaints and they are assisted by Customer Services. If you are not satisfied with the way in which they have handled your complaint or rights request then you can contact the

If you are not satisfied with the response you can complain to the ICO. Their contact details are

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113

You also have the right to seek a judicial remedy, issue legal proceedings against us.

### **How long we keep your personal data for**

We generally retain personal data for around 6 months after the legal limitation periods in which claims can be brought or industry recommended periods. We would also retain information if we are under a legal or regulatory requirement to do so.

### **Changes to this Privacy Policy**

We may occasionally update this statement