

# Concessionary/Diamond/Platinum Travelcard Privacy Notice - West of England Combined

## Privacy Notice

The purpose of this privacy notice is to tell you about how we collect and use personal data in connection with our service, which is the issuing and management of concessionary/diamond travel cards. We may update this privacy notice from time to time. When we do this, we will communicate any changes to you and publish the revised privacy notice on our website.

West of England Combined Authority is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the UK General Data Protection Regulation (UK GDPR). This means it determines what your personal data is used for and why it is collected.

Our main address is 70 Redcliff Street, Bristol, BS1 6AL and [our contact details can be found on the Combined Authority's website](#).

For the purposes of this privacy notice, the concessionary/diamond free travel service is managed on our behalf by the following Unitary Authorities:

- Bath & North East Somerset Council
- Bristol City Council &
- South Gloucestershire Council

For the purpose of processing all concessionary/diamond free travel related data provided to them, the West of England Combined Authority is the data controller and each of the above organisations are our data processors.

In addition, South West Smart Applications Limited (trading as Smart Applications Management) provides the software to manage our concessionary fares customer management system and produces the concessionary travel cards on our behalf. It is also a data processor.

We only allow our data processors to handle the personal information referred to below if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on our data processors to ensure they can only use your personal information to provide services to us and to you.

### **What data we need to collect and use?**

To provide this service, the Unitary Authorities will collect and use some or all the personal information below:

- Name
- Date of birth
- Email address
- Address
- Phone number
- ID photo
- Physical and/or mental health details

We get most of this information from you when you apply for a concessionary/diamond travel card and from what we learn about you through your use of concessionary/diamond travel card services.

### **How do we use your personal information?**

We use this information for one or more of the following reasons:

- To meet statutory requirements under the Transport Act 2000 and the Concessionary Bus Travel Act 2007 to issue concessionary travel cards which were transferred to us under The West of England Combined Authority Order 2017.
- To decide eligibility for diamond travelcards

### **Who else might we share your personal information with?**

Sometimes we may need to share your information, but we will only do so where we have a valid legal basis. We will only share the minimum information for each circumstance. We may share some of your personal information with one or more of the following:

- Your GP
- Other relevant medical professionals for the purpose of processing your application
- External partners to detect fraud
- Third parties to validate address or identification

### **Will my personal data be sent outside the UK?**

No personal information is routinely sent or held outside the UK. Should the transfer of personal information outside the UK become necessary, it will only take place if permitted by law, and then only where there are appropriate safeguards in place to protect the data.

### **What is the legal basis for our use of your personal information?**

The information below shows the legal basis we are relying on to use your personal or special category (sensitive) personal information.

You can see a list of the full legal basis we may rely on by looking at our main privacy notice.

## **Personal information**

Our legal basis for processing your personal information is Article 6(1)(c) of the UK General Data Protection Regulation - processing is necessary for compliance with a legal obligation to which the West of England Combined Authority is subject. Under the terms of Inter Authority Agreements with the Combined Authority, the Unitary Authorities will process your personal information to determine eligibility for and then issue concessionary travel cards, where appropriate.

## **Special category (sensitive) personal information**

Our legal basis for processing your special category information is Article 9(2)(g) of the UK General Data Protection Regulation. Our legal gateway for processing this information can be found under Section 146 of the Transport Act 2000, which identifies the eligibility of individuals to receive concessionary travel cards. We also meet the substantial Public Interest Condition contained in paragraphs 5 and 6 of Part 2 of Schedule 1 of the Data Protection Act 2018 as the processing is necessary for the purpose of exercising a function conferred on us by an enactment or rule of law.

## **How long we will keep your personal information?**

We will hold this information for as long as it is needed, or if we are required to do so by law. In practice this means that your personal information may be retained if you are a holder of a valid concessionary/diamond free travel and/or platinum travel card issued to you.

## **Your rights as a data subject**

You have a right to control what and how your personal information is used by us, including the right to access a copy of your personal information and withdraw your consent and permission to use your personal data.

Full details about your rights can be found in our [main privacy notice](#). If you have any concerns or questions about how we look after your information or if you need access to the data we hold, please contact us at [info@westofengland-ca.gov.uk](mailto:info@westofengland-ca.gov.uk) or write to us at 70 Redcliff Street, Bristol, BS1 6AL and we will be pleased to send you a hard copy or help you in any other way.

For independent advice about data protection, privacy, and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
K9 5AF

If you think we have dealt with your information inappropriately or unlawfully, you have the right to complain to the ICO at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Website: <https://ico.org.uk/>