

Privacy Notice Safeguard Coaches operating as Guildford Bus

October 2018

1. INTRODUCTION

This Privacy Notice sets out how Safeguard Coaches operating as Guildford Bus protects any personal information that you give to us when you use the website <http://www.guildfordbus.co.uk>, connect with us directly, use our 3rd party ticketing services or our on board WiFi services.

When we use 3rd party ticketing services, 'Mymobile ticket', we have access to the personal information that you provide to our 3rd party ticketing service provider when you sign up to MyMobile ticket to purchase tickets online. We can also access the data that you provide to 'ICOMERA' our 3rd party on board WiFi service provider.

Safeguard Coaches is committed to ensuring that your privacy is protected. Should either our 3rd party ticketing provider or Safeguard Coaches ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this Privacy Notice. Our Privacy Notice explains in detail the types of data we may collect about you or have access to and how we will use and store your personal data.

Safeguard Coaches may on occasion change this policy and this page will be updated. You should check this page from time to time to ensure that you are happy with any changes.

This policy is effective from 1 October 2018.

2. WHO ARE SAFEGUARD COACHES

Safeguard Coaches, operate and run two bus routes – 4&5 in Guildford. We are a coach company based in Guildford. Our address is Safeguard House, Clay Lane, Guildford, Surrey GU4 7NZ.

3. WHEN DO WE COLLECT YOUR PERSONAL DATA?

We collect data directly from you when you:

- Fill in a contact form on the website
- Send us an email
- Call us directly
- Sign up for our newsletter
- Your image appears on CCTV footage onboard our bus

We have access to and can collect your data from our 3rd party ticketing service and our onboard WiFi service provider when you:

- Sign up for an account and purchase tickets through 'MyMobileTicket' [their Privacy Notice is here](#)
- Connect to the on board WiFi services provided by Icomera, [their Privacy Notice is here](#)

4. WHAT PERSONAL DATA DO WE COLLECT?

The type of personal information that we may collect from you or have access to via our 3rd parties includes:

- First & last name
- Email
- Mobile
- Address
- Date of Birth
- Photo
- Business Name
- IP Address
- Mobile phone type and version
- Web browser type and version
- Operating system
- A list of URL's starting with a referral site, your activity on our site and the site to which you exit
- Purchase Information including date purchased and ticket type
- Ticket usage information, including location, services and time tickets are used
- Ticket activation information, including location and time tickets are activated

5. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT?

	What We Use Your Personal Information For	How Do We Use Your Personal Information	What is the Legal Basis That We Use to Process Your Information
1	To send you a copy of our current newsletter.	We use your personal information (email) to send the current copy of our newsletter to your inbox.	Consent, you have given us your email address and have requested that we do this.
2	To carry out our contract with you.	To provide transportation services, journey planning and travel advice. To notify you of any changes to our services, which may affect your journey.	Contract, necessary for the performance of our contract with you or to take steps to enter into that contract.
3	For marketing our products and services to you.	To provide you with information about goods and services we believe may be of interest to you, to ensure that our services are administered effectively.	Legitimate interest
4	To develop our services and to ensure that our services are up to date, relevant and appealing.	We use your personal information to determine your likes, dislikes and needs. This may come from the comments and requests that have appeared on the site. To ensure that you receive the benefits and services that are on offer and that they are of interest to you.	Legitimate interest. It is in our legitimate interest to develop and enhance the products and services that we offer to you and to keep our website up to date with relevant information. To develop, enhance, provide and market suitable products and services to you.

5.	CCTV, To monitor on board the bus the behaviour of individuals on the bus.	We use CCTV to prevent and deter crime, apprehend and or prosecute offenders and to provide a safer environment for our staff and individual travellers. We monitor operational and safety related incidents.	Legitimate interest
6	To retain CCTV images for a reasonable period of time or as long as is required by law.	We would use this information to assist in the verification of any claims that are made.	Legal obligation
7	To disclose CCTV images.	We would use this information to assist in the verification of a claim, to aid in the apprehension or prosecution of an offender.	Legal obligation
8	To ensure that the content on our site is presented in the most useful way.	We may use your personal information which could include your IP address to measure ways in which you use our website. We could use this information to analyse the effectiveness of our site. This can allow us to structure the content and the services we offer you. We would normally use cookies for this purpose.	As appropriate we would ask for your consent to use these cookies before processing.

6. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

Your data is retained by Safeguard Coaches for as long as is necessary for the purpose that it was collected for. We will use your data to send you details of services and products that you may be interested in. If you tell us that you do not wish to receive emails from us by using the 'unsubscribe' link then marketing emails will cease. We will retain your details in a suppression list within our marketing platform 'MailChimp', their privacy policy is [here](#), this will ensure that you are not contacted by us again unless you request us to do so.

We are obliged to keep certain data to fulfil certain legal obligations and matters of record keeping e.g. financial records which we are required to keep for 6 years. Any data that is retained is minimised to ensure that we are only keeping that which is required. We will securely delete all data when it is no longer required.

7. SHARING YOUR PERSONAL DATA

Safeguard coaches does not share the personal information of individual passengers that has been given to us directly.

We use 3rd party service organisations to supply our passengers with ticketing and payment solutions and also onboard WiFi, these organisations do share your data with us.

Safeguard Coaches will never pass on your personal details to other organisations for their use, except when we have your express permission to do so or when the law requires it. We do not sell your or swap your personal data, however where applicable we share your information with subcontractors and suppliers. Staff, consultants and service providers acting on our behalf may be allowed to access your personal data; we will only allow them to do this to do at our explicit instruction and for an exact purpose.

With all 3rd party suppliers we have reviewed their policies and procedures and are content with the level of their GDPR compliance. All 3rd party suppliers will have signed a Data Sharing Agreement where required to do so, we will have checked their policies and procedures and we will be satisfied that their systems are secure. In the event that we stop using a supplier, any of your data that they hold will be securely deleted.

We may need to disclose your personal data upon request to regulatory and government bodies as well as law enforcement agencies.

8. YOUR RIGHTS

Under GDPR you have rights over your data.

1	The right to be informed, you have the right to know about the collection and use of your personal data.
2	Request access to the personal data that we hold on you; this will be free of charge in most cases. If you want to access your personal data, please let us have details of the personal data you want to see and proof of your identity by email: info@safeguardcoaches.co.uk
3	Request correction of your personal data if it is out of date, or is incorrect.
4	Request erasure of your personal data from our records, this can be done in certain circumstances.
5	Restrict processing of your personal data. You have a right to require us to stop processing your personal data in a particular way, this may only happen in certain circumstance.
6	Portability of your data, you may wish to request of copy of your data and take it elsewhere.
7	Object to the processing of your data in a certain way, you can stop your personal details being used for direct marketing.
8	Automated processing, individuals have the right to object to a decision based totally on automated processing.

If you wish to withdraw your consent to the collection and processing of your data, contact our **Data Manager on 01483 561103**

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. You are responsible for the accuracy of your personal data, please let us know if needs to be updated.

If you feel that your data is not being managed in an appropriate manner you can raise a concern with the ICO. You can also find general information from the ICO <https://ico.org.uk/for-the-public>

9. MARKETING & COMMUNICATIONS

We could use your information to inform you about products or services that we offer, which we think you may find interesting and useful. We would contact you by post, telephone (unless you are registered with the TPS) or by email, we would do this as part of our legitimate interest. You are free to opt out or unsubscribe from any marketing communication at any time or if you have given us your consent to send you the newsletter you may withdraw your consent at any time. We use MailChimp as our marketing platform; you can view their privacy policy [here](#).

10. COOKIES

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, recording what you have put in your shopping basket, analyse traffic to our website, to help with the security of our website, to allow you to log in to the site and to gain consent where appropriate.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Overall, cookies help us provide you with a better website service, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website. To find out more about cookies go to aboutcookies.com you can view our [Cookie Policy here](#)

11. SECURITY

We are committed to ensuring that your information is safe and secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Payments made to our site are processed by a secure third party; we do not use or store your financial information.

12. LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

13. CHILDREN

If children buy tickets using MyMobile then we will have access to their data and we could send them marketing material as we not have access to an individual's age via MyMobile. We do not however intentionally collect, store or use the data from individuals under 16 years of age.

14. HOW TO CONTACT US

If you have any questions or queries about how we collect and use your data, please feel free to contact us:

By email at: buses@safeguardcoaches.co.uk

By mail: The Data Manager, Safeguard Coaches Limited, Safeguard House, Clay Lane, Guildford, Surrey GU4 7NZ