Privacy statement Travelling with a contactless Debit Card and/or OV-Pas at Transdev and Connexxion

(Version November 2026)

The nine Dutch public transport operators[1] ("Transport Operators") and Translink are jointly facilitating two additional options for travelling by public transport purchasing a (Transport) Ticket by checking in and checking out using your Debit Card or OV-pas. In this privacy statement, we refer to a Card when we mean both the Debit Card and the OV-pas.

For the Debit Card, we do this in collaboration with a number of payment service providers[2]. These payment services link a public transport travel function in the Netherlands to your debit card. You pay for your journeys via the bank account linked to your debit card.

With the OV-pas, you pay for your journeys using the balance associated with your OV-pas or you pay afterwards if you travel on account. The OV-pas is issued by Translink and the balance is also managed by Translink. If you have any questions about the OV-pas, such as how it works, how to purchase it and your balance, please contact Translink. For questions regarding journeys made, please contact the transport operator you are travelling with or Translink.

When you travel by checking in and out with your Pass, you and Transdev enter into a transport agreement to which the 'General Terms and Conditions for Urban and Regional Transport' apply. When using the Debit Card, the OVpay Check-in/out Conditions Using your Debit Card and Credit Card' also apply. When using the OV-pas, the 'Terms and Conditions OV-pas' apply. If you use age discount on buses, trams or metros or another discount or free-travel product (such as a season ticket), the related product terms and conditions also apply. If you travel on account, the terms and conditions of this service (for which you have an agreement with the Payment Service Provider (PSP) also apply. The processing of your Personal Data is necessary to implement this. This allows you to travel and pay with your Card on Transdev public transport. Transdev and Translink can also provide you with services.

If you do not want Transdev and Translink to have access to the necessary Personal Data, you will not be able to travel and pay with your Debit Card and will have to use another regular Ticket.

Would you like to know more about the use of your Personal Data when travelling with a Card on Transdev buses? Then read on.

[1] Arriva, Transdev, EBS, GVB, HTM, Keolis, NS, Qbuzz and RET. See ovpay.nl for the most up-to-date overview.
[2] Maestro, Mastercard, VPAY and VISA. See ovpay.nl for the most up-to-date overview.

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Reading guide

Part 1 of this privacy statement explains the terms we use in this privacy statement.

Part 2 describes how travelling with a Card works and what personal data we use and for what purpose. This concerns personal data that is necessary for contactless payment for your journey, cross service and if you contact the customer services of Transdev and/or OVpay.

In part 3, we describe your rights under privacy laws and regulations and provide more information about how we handle your Personal Data. You will also find our contact details here if you have any questions about this privacy statement.

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Part 1 - Definitions

This privacy statement uses capitalised terms that are explained in the text of this privacy statement. For convenience, we have listed these terms and their meanings in this chapter.

App: a mobile application developed and offered by a Public transport operator or Public transport operators and Translink jointly (OVpay) that allows Passengers with a Card to create, consult their online account, link the Card to it, and thus, for example, to easily view their travel transactions and payments and submit service requests. Use of an App is subject to the terms and conditions of use of the relevant App.

ASI / AVR ("Account Status Inquiry / Account Verification Request"): depending on the payment scheme of the Debit Card, a status check is performed on the Debit Card. For Debit Cards of the Mastercard payment scheme, this is an ASI. For Debit Cards in the VISA payment scheme, this is an AVR. This status check verifies that the Debit Card's payment account exists and that the Debit Card is active and, for example, has not been reported stolen.

Bank: a financial undertaking that provides payment services and holds the Bank Account to which the Debit Card used by the Passenger on public transport is linked. This also includes a credit card company or other regulated financial undertaking which as a financial undertaking is offering payment services and which has issued the Debit Card.

Card: a Debit Card and the OV-pas.

Controller: a natural or legal person, a government agency, a service or another body that, alone or together with others, determines the purpose of and means for Processing Personal Data as defined in the GDPR.

Debit card: a contactless card issued by the Bank (physical or digital on a mobile or smartphone) that the passenger uses and pays for public transport by checking in and out at designated card readers at stations, stops and in vehicles. This also includes a card issued by a credit card company with which the passenger uses and pays for public transport.

Discount profile: the profile that Translink and the Public transport operator you travel with can access to check and inspect if you are entitled for a discount. The Discount profile requires your name and/ or date of birth and/ or photo.

General terms and conditions for urban and regional transport: the general terms and conditions for the use of public urban and regional transport by bus, tram, light rail, metro and regional public transport by train of the following transport operators: Arriva, EBS, GVB, HTM, Qbuzz, RET, Keolis and Transdev.

Joint controller: If two or more Controllers jointly determine the purposes and means of the Processing, they are Joint Controllers as defined in the GDPR.

OV-pas: a contactless card issued by Translink that the passenger uses and pays for public transport by checking in and out at designated card readers at stations, stops and in vehicles.

PAN number: the Debit Card's serial number, which is stored in the card's chip and is not visible. The PAN number is different from the card number. The card number is visible on the front of the card.

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Payment reference number: this is a code comprising a combination of fourteen letters and numbers, created uniquely for each payment. This code is linked to the amount that is debited from your Bank account when paying with a Debit Card.

Payment service provider (PSP): a party that enables you to travel on account with your OV-pas. Traveling on account means that you can pay for your public transport journeys with your OV-pas afterwards, for instance by direct debit or a regular transfer.

Personal product: the product is personal if its product conditions so provide. Personal means that only the person in whose name that product is registered may travel with that product in combination with the OV-pas.

Personal data: any information regarding an identified or identifiable natural person as defined in the GDPR.

Primary Account Number ("PAN"): unique debit card identification number or, more simply, the card number consisting of sixteen digits. For credit cards, this number is visible on the front of the credit card. For debit cards, this number is stored in the chip of the debit card and is not visible in almost all cases.

Processing: an operation or set of operations relating to Personal Data or a set of Personal Data, whether carried out by automated processes or not as defined in the GDPR.

Processor: a natural or legal person, a government agency, a service or another body that Processes Personal Data on behalf of the Controller as defined in the GDPR.

Pseudonymisation: the Processing of Personal Data in such a way that the Personal Data cannot be linked to a traveller without the use of additional data, provided that this additional data is stored separately, and technical and organisational measures have been taken to ensure that the Personal Data is not linked to an identified or identifiable traveller as defined in the GDPR..

Public transport operator(s) (PTO): the Dutch public transport operators listed on the OVpay.nl website.

Technical card details: this technical data consists of the numbers of the Card, namely the PAN, the PAN serial number, and the validity date. The PAN is a unique card identification number. The PAN serial number is contained in the chip of the Card and is not visible.

(Transport) Ticket: the ticket that provides valid access to the bus and that has been purchased by the passenger by checking in for each journey with Transdev with the Debit Card used to travel, and that consists of a digital registration in the Generic Back Office. A Ticket is only valid if it meets all the requirements set out in the General Terms and Conditions for Urban and Regional Transport.

Transdev: Connexxion Openbaar Vervoer N.V., with registered office in Haarlem and principal place of business in Hilversum, trading under the name “Transdev Nederland Openbaar Vervoer”, hereinafter referred to as: “Transdev”, and its affiliates or subsidiaries.

Travel day: the period that begins at 00:00 and ends at 03:05 the following day.

Translink: Trans Link Systems B.V., with its registered office and place of business in Amersfoort.

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Website: the websites of Transdev and Connexxion, or the website www.ovpay.nl, which is managed by Translink on behalf of all PTO's, on which the passenger can find information on journeys and payment by Card.

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Part 2 - How does travelling and paying with a Card work?

A. Purchasing an OV-pas (balance)

You can purchase a physical OV-pas via the OVpay app[3] and www.ovpay.nl. You can also purchase an OV-pas at a Public transport operator via its website, service desks or card vending machines. When you purchase an OV-pas, it is assigned a unique number in the central administration system of Translink. This is necessary to keep track of the balance on the card and to settle any trips made using the balance on the OV-pas. The balance changes when traveling with the OV-pas or when money is added to or withdrawn from the account.

To deliver the physical OV-pas, Translink requires a name and delivery address. These personal data will be stored for 30 days. This allows Translink to produce and send a new OV-pas to you in case anything goes wrong during the production or delivery process.

A physical OV-passes can also be purchased (including topping up balance) at several nationwide operating retailers (i.e. Primera and Albert Heijn). This will be possible with both cash and Debit Card. When you purchase an OV-pas this way, Translink is not Processing Personal Data. Translink does also not know who purchased the OV-pas. While Translink can see which journeys were made with the OV-pas, it does not know the identity of the person or people who used it.

Charging, managing and withdrawing balance of an OV-pas

You can use the OVpay app and the OVpay website to top up your balance to a maximum of €150,- and to check your balance. You can also purchase balance at a Public transport operator via its website and service desks.

If the OV-pas is lost, stolen, or malfunctioning, this must be reported via the OVpay app or OVpay customer service. To process such a report, Translink requires the card number and verification code associated with the OV-pas. These identifiers are printed on the card, one on the front and one on the back. Once reported, the OV-pas will be blocked and can no longer be used for travel. If you don't know the card number and verification code of the OV-pas, it can't be blocked.

If you order a new OV-pas via your OV-pay account at a Public transport operator, your remaining balance will be transferred automatically to the new OV-pas. However, if you order a new OV-pas without having an account (e.g. via a retailer) you have to do this manually.

An expired OV-pas will be blocked by Translink and will no longer be valid for travelling.

Automatic reload OV-pas

Automatic reload allows you to reload your balance related to a specific OV-pas automatically. This requires an agreement between you and Translink with you granting permission to reload the balance of a specific OV-pas automatically with a predetermined amount. The reloading occurs automatically when activating the service. It also occurs when:

- Using the OV-pas to check-in at a public transport operator and the balance is below the minimum required amount at that specific Public transport operator;
- The balance is too low to pay for a journey after traveling with the OV-pas at a Public transport operator;
- The balance is €10,- or less.

[3] The privacy statement for the OVpay app can be found in the OVpay app and on the OVpay website under privacy.

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Automatic reloading can only be requested and activated via an OVpay account in the OVpay App and at the OVpay website. It can't be requested via other means such as via a Public transport operator or Payment Service Provider. The person closing the contract can be the user of the OV-pas although this is not a prerequisite. One can also close the contract for e.g. a family member. The agreement however is always linked to a specific OV-pas.

Travelling on account with an OV-pas.
Travelling on account means that you are paying afterwards for any trips made with the OV-pas. This requires a separate agreement with a Payment Service Provider. That agreement determines the payment terms, such as the payment deadline and payment method (e.g. by direct debit or a regular transfer). You thus become a customer of the PSP.

Translink will charge the PSP for any trips made. The PSP then will pay the Public transport operator (via Translink) for each journey you make on account. Afterwards, the PSP will settle the amount with you. The amount charged to you by the PSP may differ from the fare charged by a Public transport operator for the same journey when traveling on balance.

Failure to comply with the PSP's terms and conditions (including payment terms) may result that travelling on account with the OV-pas will be blocked (temporarily). You can still use your OV-pas for travelling on balance, assuming the OV-pas has sufficient balance attached to it to do so.
A PSP is responsible for the data it receives from Translink and the Public transport operators. The PSP will inform you about how it processes your data; this information is not included in this privacy statement. Public transport operators and Translink in principal cannot link your personal data to you. However, if you purchase a personal product from a Public transport operator or create an app account with Translink with Translink or a Public transport operator, this may become possible.

Personal or non-personal product link to an OV-pas
A physical OV-pas can in principle be used by anyone who has the card in their possession. You can also link a Personal product to the card, such as your Discount profile for bus, tram and metro travel. Once one or more Personal products are linked to an OV-pas, only the person whom the Personal product or Discount profile belongs is allowed to travel with it.

Regarding the physical OV-pas you have the option to make it personal or not. You make an OV-pas personal by linking one or more personal products to it such as your Discount profile bus, tram and metro or a free-travel product (such as a season ticket). A non-personal physical OV-pas can be used for travelling by anyone who possesses the OV-pas.

When ordering a physical OV-pas, you can also request to have an attribute printed on the card. This attribute can be your name, but also anything else such as 'family card' or 'card 2'. This helps you recognize the card more easily. This does not make the OV-pas personal, others can still use it for travel (as long as no Personal product or Discount profile is attached to it). Adding an attribute is not possible when purchasing an OV-pas at a retailer.

Student travel product on your OV-pas
Over the coming quarters, the student travel product connected to an OV-pas will become available for an increasing number of students. If you do not yet have an OV-pas, you will need to purchase one first. You will also need to create a personal profile, providing your email address, name and date of birth. You can

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then apply for the student travel product. RSR[4] will check its administration to see if you are eligible. It will also check with Translink, as the administrator of your personal profile, to ensure that this profile matches the details held by RSR. If so, RSR will connect the student travel product to your OV-pas.

Public transport pass data protection

In principle, the OV-pas is not linked to you as an individual. This means that if you have a physical OV-pas, you can use it to travel as long as no Personalised product or Discount profile is linked to it.

As the OV-pas is not linked to a specific individual by default, anyone in possession of your OV-pas may also be able to use certain services. This includes viewing journeys made, refunding credit, reporting the loss or theft of the OV-pas, or correcting a missed check-out via the OVpay app, ovpay.nl or a Public transport operator's website or app.

If you want to prevent anyone else from using these services for your OV-pas without your permission, you can activate additional data protection. You can do this by connecting your OV-pas – using the pass number and verification code – to your OVpay account. The additional data protection will then be activated automatically. You can also activate this protection without an OVpay account via ovpay.nl or through a Public transport operator.

To create an OVpay account, you'll need an email address and a password. When you connect your OV-pas, you'll receive an email at the address you've provided. Once you've confirmed this email, the OV-pas will be connected to your account. An OV-pas can only be connected to one OVpay account at a time. If you wish to connect the OV-pas to a different OVpay account, you must first unlink it from the current account. However, you can connect an OV-pas to both an OVpay account and an account with one or more Public transport operators at the same time.
If you do not activate additional data protection, you can still use services via ovpay.nl. You can also use ticket machines and service desks operated by various Public transport operators.

B. Travelling

Travelling with your Debit Card for the first time

The first time you check in with your Debit Card, an automatic check is made to determine whether that Debit Card is suitable for travel. This also occurs if you have not used the Debit Card in question for travel for 14 days and then check in again.

Translink will also check at the Bank that holds your Debit Card if it has been blocked. If blocking is the case, the Public Transport travel function of the Debit Card will then be blocked, and you will not be able to use it for travel. This is a decision of the Bank. The Public transport operators and Translink cannot change this.

Travelling with your Card

When checking in with a Card, the card reader will read the Technical data. Here we check whether the card can be used to travel, and will inform you accordingly via the card reader. A Debit Card will be blocked for example if it not possible to travel at Dutch public transport with the card issuer. Holding your Card at a card reader is called a tap.

[4] Regisseur Studenten Reisrecht (RSR) is the organisation which is responsible for the digital administration and management of the student travel product (' student-OV'). If you as a student have applied for your student travel product via DUO, RSR will connect it to your OV-pas.

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If you are able to travel using a Card, personal data will be sent to Translink when you check in and out using the card readers of the Public transport operator with which you are travelling. In addition to the Technical data of your card, this includes the date, time and stop or station where you boarded or alighted. Translink records all check ins and check outs, constructs all the trips made and calculates the trip fares. Your journey is compiled and your fare is calculated using this information as well as, if applicable, additional information on products and profiles granting you a discount.

To be able to use the Discount profile 'age discount in bus, tram and metro', you have to provide your name, date of birth and photo in the OVpay app, OVpay website or in the App of a Public transport operator. If you do not want the Public transport operators[5] and Translink to have the necessary Personal data, you will not be able to use age discount in bus, tram and metro.

Checking the validity of your Debit Card and OV-pas

Every time you check in with your OV-pas, an automatic check will be made against deny lists to ensure that the balance attached to the card is sufficient for travelling. The minimum required balance for travelling can differ per type of transport and is being determined by the Public transport operator.

In addition, every time you check in with your Debit Card or OV-pas, an automatic check will be made against deny lists to ensure that the Card has not been blocked. The deny list is managed by Translink and distributed to the Public transport operators. A Card will be added to a deny list by Translink if:

- the Card is on an alert list of the Bank (Debit Card) or Translink and Public transport operators (OV-pas), e.g. because it is listed as stolen or missing;
- settlement for the Card has not been made for the use of public transport, e.g. because your balance was insufficient at the time of settlement;
- Various settlements of a Debit Card linked to the same bank account have not been made;
- A product or profile granting you a discount is used while not respecting the applicable terms and conditions.

Park and ride (P&R)

At many places you can park your car at a P&R location while continuing your journey by public transport. You have to use the same card (such as OV-pas or Debit Card) for parking and traveling at the payment terminal.

When paying for the parking the P&R manager requests Translink to check in its systems if you have been traveling with public transport and if a discount is applicable. The discount depends on the location and agreements made between the P&R manager and the municipality. At NS P&R travelling with a Debit Card is not applicable for any discounts.

Translink will never share your travel details with the P&R manager. It just notifies if a discount is applicable. The P&R manager processes the discount and arranges with you the payment for parking.

C. Payment

Paying with your Debit Card

When checking in and out with a Debit Card, Translink calculates the fare for the journeys you make. Translink settles in corporation with Fiserv (previously called EMS)[6] and your Bank the payment for the trips made by you. During the night following the day on which you travelled, the amount due for all the journeys you made in one day is presented in one sum to Fiserv and then to your Bank. To process the

[5] Excluding NS, since NS does not offer the Discount profile 'age discount in bus, tram and metro'.

[6] Fiserv Ltd. ("EMS"), www.fiserv.com

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payment, Translink provides the Technical data and the Payment reference number to Fiserv and your Bank.

During the Travel day Translink debits the amount due for travelling if the amount surpasses a predetermined limit as set by the Public transport operators. The amount due for all journeys will then directly be debited against your balance. After a successful payment any other journeys you will make will be presented to the Bank during the night following your Travel day, unless the predetermined limit will be surpassed again.

Upon successful payment, you can see the amount debited on your (digital) account statement. You will receive a unique Payment reference number on your account statement. This number is unique per payment and is preceded by the letters 'NLOV'. You can find your account statement by logging in to your secure Banking environment.

Because you can use different services with your Payment reference number and related amount, it means that sharing these with another person or organisation, they/ these can get insight in the trips made by you.

Paying with your OV-pas
When you check in and out with your OV-pas, Translink calculates the fare for the journeys you make. Translink also processes the payment for your journeys when travelling on credit. After checking out, the cost of the journey is immediately deducted from the credit linked to your OV-pas. If the payment is successful, you can immediately see the amount deducted in the OVpay app and at www.ovpay.nl, provided you have linked your OV-pas to a personal account.

An unsuccessful payment
If the payment with the Card is unsuccessful, for example because the balance is too low, Translink will block the OV-pas or the travel function associated with the Debit Card. You can then no longer travel with your Card until the outstanding amount has been paid or the balance of the OV-pas contains the minimal required balance for travelling.

Amount due for Debit Card
Translink may issue repeated payment requests to debit the amount due from your Debit Card account within a period of 62 calendar days. The block will be lifted if the payment is successful. During this period as well as afterwards as a traveller you can also pay the outstanding amount yourself.

- To do so, you have to offer your Debit Card to a card reader of a Public transport operator. Via Translink and Fiserv a payment request will be made to your Bank. Such request is capped at once per day;
- You can pay the outstanding amount in the OVpay app and www.ovpay.nl via your personal account. Via Translink and Fiserv a payment request will be made to your Bank;

If the payment succeeds for one of those methods, you will then be able to travel again with your Debit Card approximately 15 minutes later.

Amount due for OV-pas
You can lift the blocking of your OV-pas by paying the amount due in the OVpay app, via www.ovpay.nl or by loading balance via for example a Public transport operator or at Primera or Albert Heijn. Via Fiserv a payment request will be made to your Bank. If the payment succeeds, you will be able to travel again with your OV-pas approximately 15 minutes later.

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Please notice that to be able to travel with an OV-pas you need a required minimum balance on the OV-pas as determined by the Public transport operator you like travelling with.

Blocking the travel function
You can check whether the travel function of a Pass has been blocked by presenting your Pass at a transport operator's card reader and checking the message on the display, or by contacting OVpay customer service.

If the travel function of the Pass is blocked, you can of course always use another ticket to travel by public transport.

D. Summary reports
All Public transport operators receive each daily summary reports from Translink in order to check the accuracy of their own transactions and payments, to detect and correct potential mistakes and to safeguard the integrity of the public transport system. These are reports on transactions (such as check-in, check-out or failed tap), journeys (combining a check-in with a check-out) and payments relating to the specific Public transport operators. Translink ensures that every Public transport operator receive daily all payments made for all travels made by Cards.

E. Service
We do understand that you may have questions about a journey, invoiced costs or a missed check-in or check-out. Or perhaps you'd like to see the previous journeys you have undertaken. You can view and request (parts of) your journeys

- In the Transdev App or via the Transdev Customer care;
- Through the OVpay website, OVpay App and OVpay Customer care.

For us to help you, you will need to have for your Debit Card the Payment reference number in combination with the corresponding amount of your account debit. We do not know your Debit Card number, nor can we search your IBAN. Regarding the OV-pas we require the card number and verification code. Both are printed on the OV-pas.

App and website
Within both the Transdev App and the OVpay App, you can link one or more of your Cards to the App. You first create a personal account with your own password. The linking can be done in several ways with:

1. your Payment reference number and corresponding amount. This however only works within 31 days of travelling and when you made a contactless payment for your travel.
2. the PAN and expiration date of your Card. Then enter these at your account and use your Card for travelling;
3. your IBAN and expiration date of your Debit Card. Then enter these at your account and use your Debit Card for travelling within 60 days.

Services via app and website
Via your online account it is amongst others possible to check if you did check-in and/ or check-out, the fare for travels you made and your payments, payments status and any contingent blocking of your Card. In the OVpay app you can also correct any missed check-ins or check-outs and pay for any outstanding amount for travelling.

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In the OVpay app you can also view all travel history of the journeys you have made in the past 18 months using your Card for all public transport services. In your account of a Public transport operator (web or App) you can only view the journeys you made with that Public transport operators using your Card, also for the past 18 months.

In the Transdev App, at www.ovpay.nl and OVpay app, you can also set to receive notifications when checking in and checking out and additionally in the OVpay app also to receive notifications for any outstanding amount.

In the OVpay app, at www.ovapy.nl and in the Transdev App you can create a Discount profile 'age discount at bus, tram and metro' to benefit from a discount if this is applicable to you.

OV-pas
Via the OVpay app, www.ovpay.nl and the website/ app of a Public transport operator you can purchase an OV-pas and view, charge and withdraw your OV-pas balance. If you lost your OV-pas, it has been recovered or it has been stolen or is defect, you have to report this via the OVpay app or OVpay Customer Care.

Customer service
If you have any questions about travelling with a Pass, please contact the Customer care of Transdev or OVpay customer service. Customer care staff do not have access to your Debit Card (account) details. OVpay customer service does have access to your OV-pas details, including balance changes, in order to help you with any questions you may have. A member of staff will always explicitly ask for your details if this is necessary to answer your questions.

The Transport Companies and Translink have made mutual agreements so that every Transport Company can also assist you with questions about a journey with other Transport Companies. It has been agreed that you can contact the Customer Service (by telephone or at a service desk) of any Transport Company for questions about all journeys and transactions you have made in the last 62 days.

For questions about a missed check-in or check-out, please contact OVpay customer service.

Our service staff will only have access to the information necessary to answer your questions.

F. Inspection

Everyone using public transport must have a valid Ticket. If you check in with a Card, your Transport Ticket has been linked to your Card via a registration at Translink. Special detection inspectors ('BOA' in Dutch) conduct regular checks in the vehicles/carriages and at stops and stations, to check if passengers have a valid Ticket. This includes conducting checks on the validity of your Personal product and Discount profile. If an inspector wishes to check your Ticket, you must present your Card to the inspector's ticket reader.

To enable the inspector to provide you with courtesy and/or service, the inspector will ask your specific permission to do this. The inspector can then view the last ten actions involving the use of your Card for public transport on their device (up to a maximum of 62 days ago). This data is displayed on the device for a maximum of five minutes, but will disappear earlier if another Card is held against the card reader. When using a Personal product or Discount profile, then this will be visible at inspection for the inspector. This product or profile is however only visible when it is applicable for your current journey. In all other cases, this product or profile will not be visible for the inspector.

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If the data provided by you for the Personal product or Discount profile are not correct, the inspector can block this Personal product or Discount profile. You are then unable to further use it. At the OVpay app, via OVpay customer care or the customer care of the public transport operator you travelled with you can correct your data, after which you are again able to use these.

An inspector may confiscate or block an OV-pas on behalf of Translink if:

- it has been reported lost or stolen;
- you attempt to travel with an OV-pas whose validity date has expired;
- you act in breach of these OV-pas terms and conditions; and/ or
- there is a suspicion of fraud or misuse of the OV-pas and/ or products linked to the OV-pas.

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Part 3 - Rights and further information

A. Identity of the Controller

Your Personal Data is Processed by:

- Connexxion Openbaar Vervoer N.V., trading under the name "Transdev Nederland Openbaar Vervoer", a public limited company incorporated under Dutch law, with registered office in Haarlem and principal place of business in Hilversum at (1211 EX) Stationsplein 13, registered at the Dutch Chamber of Commerce under number 32083680 ("Transdev"), and;
- Trans Link Systems B.V., a public limited company incorporated under Dutch law, with registered office and principal place of business in Amersfoort at (3818 LE) Stationsplein 151, registered at the Dutch Chamber of Commerce under number 30177126 ("Translink").

Transdev, the other Public transport operators and Translink are Joint Controllers for processing Personal Data relating to travel using a Card, for the following processes and the associated Personal Data:

Process	Purpose	Personal data	Retention period
Tapping *Legal basis: performance of a contract*	Check Debit Card and validation of travel transaction	Technical data (PAN, PAN serial number and validity date); Tap data	Maximum 24 hours
Processing taps (transaction processing) *Legal basis: performance of a contract*	- Processing of taps; - Qualifying of taps: tap-in/ tap-out/ tap driven debt recovery; - Compiling journeys based on check-in/check-out; - setting the price for a journey; - preparing travel transaction data/ tap driven debt recovery for payment; - Parting trips and creating synthetic split-trips per Public transport operator to be able to allocate split-trips to the correct Public transport operator and to determine the fare.	Technical data (PAN, PAN serial number and validity date); pseudonymised tokens; Travel transaction data	18 months
Managing balance (mutations) OV-pas *Legal basis: Performance of a contract*	Managing balance of an OV-pas for: - Made and corrected journeys; - Charged and withdrawn amounts.	Pseudonymisation tokens; balance credit; balance changes.	5 year (balance amount) after validity ends of OV-pas
Managing and applying deny lists *Legal basis: Legitimate interest (insufficient balance OV-pas; outstanding debt at another Public transport operator (s);*	Managing deny lists by Translink and applying by Public transport operators to deny access to public transport of - Stolen and lost Passes; - Passes with an outstanding debt;	Pseudonymised tokens; reason of listing	Old lists are not retained. The list on the validators is replaced twice a day.

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Process	Purpose	Personal data	Retention period
e.g. lost/ stolen Card); performance of contract (outstanding debt at Public transport operator).	- OV-passes with insufficient balance for required kind of transport (e.g. bus or train).		
Central traveller support (self-service) - without or with service account *Legal basis:* *Performance of a contract*	Providing passengers with insight into travel and payment transactions and outstanding debt via OVpay website and Ovpay app; Facilitating missed check-out via OVpay website, OVpay app and OVpay Customer care; Creating Discount profile to receive discount at bus, tram and metro when travelling with a Card; Purchasing a (personal) Personal product and applying such when travelling with a Card.	Payment reference number; Payment transaction data; Outstanding debt; Travel transaction data.; pseudonymisation tokens; name, or name, date of birth and/ or photo.	Until service is provided; no data is left behind on the OVpay website or in the OVpay app; Until the data is no longer required for a Discount profile or Personal product
Decentral traveller support (self-service) - with service account at Public transport operator *Legal basis:* *Performance of a contract*	Providing passengers with insight via website/ app of Public transport operator into: - travel and payment transactions at the Public transport operator (transactions in the last 18 months); - outstanding debt and related underlying transactions (if relevant) at other Public transport operators.	Payment reference number; Payment transaction data; Outstanding debt; Travel transaction data.	Until service is provided; no data is left behind on the website/ in the app of the Public transport operator.
Decentralised traveller support via customer care - cross service *Legal basis:* *legitimate interests of PTO's and Translink*	Via Customer care (counter or telephone) of Public transport operator to inform about: - outstanding debt; - travel transactions and payment transactions at other Public transport operators (cross service) (last 62 days)	Payment reference number; Payment transaction data; Outstanding debt; Travel transaction data.	Until service is provided, Public transport operator's Customer care only has view on transaction data .
Inspection/checking of valid ticket *Legal basis: performance of contract*	- Based on check-in/ check-out, checking whether a passenger has a valid electronic Ticket when using public transport; and if applicable checking the validity of the Personal	Technical data (PAN, PAN serial number and validity date); pseudonymisation tokens; Travel transaction data; products; name or name, date of birth and/ or photo.	Data will automatically be deleted as soon as (i) the inspection device receives a reply that the Card has been checked in/out and 5 minutes have passed, (ii) another Card is presented for inspection or (iii) the inspection (app) is closed.

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Process	Purpose	Personal data	Retention period
	product and/ or Discount profile; - If there is no valid check-in, verification of the last ten public transport transactions with the same payment card in order to determine follow-up action by the Public transport operator ('granting discharge')		
Mobile service to passengers *Legal basis:* Performance of a contract; legitimate interests of Public transport operators and Translink	Upon request from a passenger, the inspector can scan the Debit Card to provide information on the last ten travel transactions made on public transport using the same card.	Technical pass details (PAN, PAN serial number and expiry date); Pseudonymisation tokens; Travel transaction details.	Data is automatically deleted as soon as (i) the inspection device has received the response that the Pass has/has not been tapped in/out and 5 minutes have elapsed, or (ii) the next Pass is presented for inspection, or (iii) when the inspection (app) is closed.
Composing and delivering of feedback reports regarding processing of travel transactions *Legal basis:* *Legitimate interest of transport operators and Translink. Legal obligation of transport operator*	Safeguard integrity of the public transport system (e.g. validating transactions) and administer contract of carriages, financially closing the loop of transactions as well as enabling financial administration and accountability	Travel transaction data (such as check-in/check-out; date/time; location; means of transport; journeys and prices per journey); pseudonymisation-tokens.	18 months (legitimate interest); 7 years (legal obligation)

B. Contact details

For questions, requests and complaints about travelling with a Card, please contact:

Transdev Customer Service:
Telephone number: 0900-8686
Available by telephone Monday to Saturday from 7:00 a.m. to 8:00 p.m.
Contact form at www.transdev.nl/klantenservice/contact
Transdev Service Desk at Stationsplein 13 in Hilversum (open Monday to Saturday from 7:00 to 19:00)[7]

Connexxion customer service:
Telephone number: 0900-2666399
Available by telephone Monday to Saturday from 8:00 to 19:00.
Contact form at www.connexxion.nl/klantenservice/contact

For questions about travelling with a Card in general, please contact:

OVpay Customer Service:
Telephone number: 0900-1433

[7] These times may vary during holiday periods and public holidays.

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Contact form at www.ovpay.nl/contact
Available Monday to Friday from 9:00 a.m. to 5:00 p.m.

If you would like more information about how Transdev or Translink handles your personal data, please contact the data protection officer of either organisation:

Transdev:
fg@transdev.nl

Translink:
fg@translink.nl

C. The Basis for Processing

Checking in and out using a Card is the basis for the Processing of Personal Data. The legal ground for doing so is the performance of an agreement. This is a transport agreement to which the General Conditions of Urban and Rural Transport apply as well as either the 'OVpay Check-in/out Terms and Conditions using your Debit Card and Credit Card' or the "terms and Conditions OV-pas'. This depends on the card you are using.

The provision of Cross Service is based on the legitimate interests of the Public transport operators and Translink. We would like your questions to be answered as well and as efficiently as possible via just one service point rather than several. It is in your interests as a traveller, as well in the interests of the Public transport operators and Translink, that we can handle your questions about travelling with several Public transport operators properly and efficiently.

Managing notifications for checking in, checking out and outstanding amount in the Transdev App, OVpay app and OVpay website is based on your consent.

Translink and Public transport operators have a legitimate interest for managing deny lists of Cards. Translink is distributing these to Public transport operators enabling them to check if a Card is eligible for usage in public transport.

D. The recipients of the Personal Data

Both Public transport operators and Translink make use of the services of Processors. Each always signs written agreements with external parties (such as IT suppliers) who process Personal Data on our behalf. This is done by entering into a so-called 'processor's agreement', in which among other things we stipulate agreements about the security of your Personal Data and about the use of the Personal Data.

Translink engages the services of Fiserv for handling payments with your Bank. To process the payment, Translink provides the Technical data and the Payment reference number to Fiserv who Processes this data in its capacity as Controller.

Translink makes use of the services of iProov[8] for taking your photo in the OVpay app. This photo is required to apply for age discount as part of a Discount profile for bus, tram and metro. iProov Processes this data as a Processor.

[8] iProov Ltd, www.iproov.com

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Translink makes use of the services of Thales[9] for issuing and producing the physical OV-pas. Thales Processes these data as a Processor. Translink provides to PostNL your name and delivery address to enable to deliver the OV-pas ordered by you. PostNL Processes these data as a Controller.

In certain cases, the Public transport operators and Translink have the obligation bases on legal obligations to share your data with third parties.

E. How long will your Personal Data be retained?

We need your Personal Data to enable check-in and check-out with your Debit Card, allow inspection of your Debit Card, and to be of use to you, which includes providing you with service. This also determines the retention period of your Personal Data. We do not keep your Personal Data for longer than is necessary, and not for more than 18 months. After that, we delete your Personal Data. Banks and Credit-Card Companies have their own retention periods, based on legislation and regulations that apply to them.

F. What are your rights as data subject?

In principle, you have the following rights:

- The right to know if and what Personal Data of yours is being Processed.
- The right to access this Personal Data (insofar as this does not violate someone else's privacy).
- The right to have your Personal Data transmitted.
- The right to have your Personal Data rectified, completed, or removed if necessary.
- The right to have your Personal Data (partially) erased. A request for erasure can only be granted if the retention of your Personal Data is not of significant interest to us or another party, and if there is no statutory regulation that stipulates that the data must be retained.
- The right in certain cases to oppose the Processing of your Personal Data.
- The right in certain cases to object to the Processing of your Personal Data.

If you wish to exercise your privacy rights, you can indicate this by contacting the Transdev or Translink Customer Care, or by contacting the Data Protection Officer of Transdev or Translink; see the contact details above (part 3 - B). It is also important for you to note that, in accordance with the information security standard PCI - DSS, the Technical data that Transdev and Translink receive from you will be encrypted in the inspection device and in the systems of Transdev and Translink. This means that Transdev and Translink cannot trace this data back to you personally. Without obtaining additional information from you (the Payment reference number and the amount that goes with it), it is impossible to make a connection between you and, for instance, your journey list. This ensures maximum protection of your privacy, but also means that it may not be possible for Transdev and Translink in certain cases to satisfy your privacy rights mentioned above.

G. Complaints about the Processing of Personal Data

Complaints about the Processing of your Personal Data can be sent to Transdev or Translink; see the contact details above (Part 3 - B). You also have the right to lodge a complaint with the supervisory authority, the Dutch Data Protection Authority. For contact details, see the website of the Dutch Data Protection Authority: www.autoriteitpersoonsgegevens.nl.

H. Automated decision-making

Automated decisions are taken in these cases:

1. A fare that is still owed

9 Thales S.A. www.thalesgroup.com

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As a passenger you always have to pay the fare that is due. If the processing of your payment fails, the (travel function of the) Card will automatically be blocked. You can then still check out for a journey, but you cannot check in for a new journey.

You may object to this automated decision whereby your Card is blocked. The reason for blocking the Card will be reviewed by OVpay Customer care, and the Card will be unblocked if warranted.

2. Debit Card blocked by a Bank
   If a Debit Card, which has been used in public transport, has been reported stolen or missing by a Bank, or if there is another reason why the card has been blocked by the Bank, the travel function of the Debit Card will also automatically be blocked. For your Debit Card this is also part of the General Terms and Conditions for using your Debit Card that you have agreed with your Bank.

   The Public transport operators and Translink cannot change this block. If you have any questions about this, please contact your Bank.
3. OV-pas (temporarily) blocked by Translink
   If an OV-pas has been reported stolen or missing at Translink, if the balance of the OV-pas is insufficient or if there is another reason why the card has been blocked by Translink, it will automatically be blocked. This is part of the terms and conditions of the OV-pas as you have agreed upon when purchasing an OV-pas. After the balance has been charged sufficiently or reporting the OV-pas as recovered, you are able to travel with the OV-pas again. A stolen OV-pas will be blocked permanently.

I. Security of Personal Data

The Transport Operators and Translink protect your Personal Data, for example against unauthorised access, loss and theft. All parties have policies in place to ensure that payments made with the Debit Card on public transport are organised in such a way that an appropriate level of security applies as standard.

The Transport Operators and Translink use PCI DSS to secure Technical Pass data. This is an international security standard designed to protect Debit Card data and prevent misuse of card data, thereby preventing damage. The Public transport operators and Translink also each apply technical and organisational measures for securing their systems, processes and (personal) data.

Your Technical Pass data is processed exclusively in a pseudonymised manner in Transdev's card readers and in Translink's central administration system.

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