

# Privacy statement Travelling with a contactless Debit Card with Transdev and Connexion

(June 27<sup>th</sup>, 2024)

The nine Dutch public transport operators<sup>1</sup> (“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 and the OV-pas. For the Debit Card we are doing this in collaboration with a number of payment services<sup>2</sup>. With these payment services, your Debit Card is linked to a public transport function in the Netherlands. You pay for your journeys via the Bank Account associated with your Debit Card. For the OV-pas we are doing this in collaboration with bunq and Mastercard. You pay for your journeys via the Monetary account associated with your OV-pas.

If you are travelling by checking in and out using your Debit Card or OV-pas, you and Transdev enter into a transport agreement to which the General Terms and Conditions of Urban and Regional Transport and the ‘OVpay Check-in/out Conditions Using your Debit Card and Credit Card’ apply. When using your OV-pas the ‘General OV-pas Conditions’ apply. When using a discount product or discount profile, the related product terms and conditions also apply. The Processing of your Personal Data is necessary in order to execute this transport agreement. You can then travel and pay with your Debit Card and OV-pas on public transport operated by Transdev. Transdev and Translink can also provide you with services.

Do you not want Transdev and Translink to have access to the necessary Personal Data? Then you will not be able to travel and pay with your Debit Card and will have to use another regular (Transport) Ticket.

Do you want to know more about the use of your Personal Data when travelling with a Debit Card or OV-pas in Transdev buses? Then read on.

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<sup>1</sup> Arriva, Connexion, EBS, GVB, HTM, Keolis, NS, Qbuzz, and RET. See [ovpay.nl](https://ovpay.nl) for the latest overview.

<sup>2</sup> Maestro, Mastercard, VPAY, and VISA. See [ovpay.nl](https://ovpay.nl) for the latest overview.

## **Overview**

In part 1 of this privacy statement, we explain the definitions that are used in this privacy statement.

Part 2 describes how travelling with a Debit Card and OV-pas works, and what Personal Data we will use and for which purposes. This concerns Personal Data that is needed for the contactless payment of your journey, cross service, and for when you contact Transdev customer care or OVpay customer care.

In Part 3, we describe your rights under the applicable data protection and privacy laws, and provide more information on how we deal with your Personal Data. You will also find our contact details here, should you have any questions regarding this privacy statement.

## Part 1 - Terms

In this privacy statement, terms with a capital letter are used that are explained in the text of the privacy statement. For your convenience, these terms and their meanings are listed in this chapter.

**App:** a mobile application developed and offered by Transdev on its own or by Public Transport Operators and Translink jointly (OVpay) that allows passengers with a Debit Card or OV-pas to create, consult their online account, link the Debit Card or OV-pas to it, and thus, for example, to easily view their travel transactions and payments and submit service requests, such as rectifying a missed check-out. 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 schedule of the Debit Card, a status check will be performed on the Debit Card. For Debit Cards under the Mastercard payment schedule, this is called an ASI. For Debit Cards under the VISA payment schedule, this is called an AVR. This status check will verify whether there is a payment account for the Debit Card or a spending limit for the Credit Card, and whether the Debit Card is active and has not been reported as stolen for instance.

**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.

**bunq:** the issuer of the OV-pas and manager of the related Monetary account. bunq B.V. is having its registered office and principal place of business in Amsterdam.

**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.

**Debit Card:** a contactless card issued by the Bank (physical or digital on a mobile device, such as a smartphone or smartwatch) 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.

**General Terms and Conditions:** “OVpay Check-in/out Conditions Using your Debit Card” and “General OV-pas Conditions”.

**General Terms and Conditions of Urban and Regional Transport:** General Terms and Conditions for the use of public urban and regional transport by bus, tram, light rail, metro, and regional transport by train.

**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.

**Monetary account:** an electronic money account for which no license requirement exists and not being supervised by De Nederlandsche Bank N.V. or Autoriteit Financiële Markten.

**OV-pas:** a contactless card issued by bunq (physical or digital at 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.

**PAN serial number:** serial number of the Debit Card and OV-pas, which is on the chip of the Debit Card and OV-pas and is not visible. The PAN serial number is not the same as the card serial number. The card serial number is however visible on the front of the card.

**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.

**Personal data:** any information regarding an identified or identifiable natural person.

**Primary Account Number (“PAN”):** a unique Debit Card and OV-pas identification number or simply the 16-digit card number. With a Credit Card, this number can be seen on the front of the Credit Card. With a Debit Card or OV-pas, this number is on the chip of the Debit Card and is almost always invisible.

**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):** the Dutch public transport operators listed on the OVpay.nl website.

**Travel Day:** the period which starts at 00.00 hours and ends the next day at 03.05 hours.

**Technical data:** this technical data consists of the numbers of the Debit Card or OV-pas, i.e. the Primary Account Number, the PAN serial number, and the validity date.

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

**Translink:** the company who a.o. registers Tickets, calculates fares, settles payments with travellers and Public transport operators and provides services to Travellers. Trans Link Systems B.V., having its registered office and principal place of business in Amersfoort.

**(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 or OV-pas used to travel, and that consists of a digital registration in the Generic Back Office. A (Transport) Ticket is only valid if it meets all the requirements set out in the General Terms and Conditions for Urban and Regional Transport.

**Travel day:** the period which starts at 00.00 hour and ends next day at 03.05 hour.

**Website:** the own websites of Transdev and Connexion, or the website [www.ovpay.nl](http://www.ovpay.nl), which is managed by Translink on behalf of all Transport Operators, on which the passenger can find information on journeys and payment by Debit Card.

## **Part 2 - How to travel and pay with a Debit Card and OV-pas?**

### **A. Purchasing and topping-up OV-pas**

You can now purchase a physical OV-pas. This can be done via the OVpay app. Via the OVpay app you can also top-up your balance on the OV-pas and view your balance.

After ordering a OV-pas, the OV-pas will be assigned an unique number. This is to manage the balance of the OV-pas and to settle any travels made with the balance of the OV-pas. After ordering bunq creates a Monetary account linked to your OV-pas. The balance of your Monetary account reduces if you travel with the OV-pas and changes if you top-up or withdraw money from it.

For the physical OV-pas Translink and bunq require your name and delivery address, so we can send you your OV-pas. Translink stores this Personal data for delivering for 30 days to ensure if something goes wrong at production or delivery Translink and bunq are able to produce and send you a new OV-pas.

In autumn 2024 it is expected that a physical OV-pas can be purchased (including topping-up balance) at a number of nationwide operating retailers. Such can be done with both cash money as well as a Debit Card. Translink neither does Process Personal data when purchasing such OV-pas nor knows who has purchased the OV-pas this way. Translink has full insight in which travels have been made, while it has no insight by whom these travels have been made. If you as traveller does not link your OV-pas in the App of a Public transport operator and/ or in the OVpay app, the Public transport operators and/ or Translink neither know which person or persons do travel with this OV-pas.

### **Personal or non-personal OV-pas**

The physical OV-pas grants you the possibility to either personalise the OV-pas or not. You personalise an OV-pas by linking one or more personal products, such as age discount, standing charge or another discount. A non-personal physical OV-pas can and may be used for travelling by anyone possessing that card.

### **Lost OV-pas**

If you lose your OV-pas, if it was stolen or if it is defect, you must report this via the OVpay app or OVpay customer care. The OV-pas will then be blocked, and it can no longer be used for travelling. To do so, we need some data of the OV-pas such as the pass number and verification code. Both are printed on the OV-pas. An expired OV-pas will be blocked as well and is no longer valid for travelling. If you request a new OV-pas, the balance of the Monetary account will be linked to the new OV-pas.

### **B. Travel**

When checking in with your Debit Card or OV-pas, 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. Holding your card to a card reader is called a "tap".

If you are able to travel using a Debit Card or OV-pas, Personal Data will be sent to Translink when you check in and out using the card readers of the 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 at urban and regional transport', you have to create an age profile in the OVpay app by providing your name, date of birth and photo. If you do not want the Public Transport Operators and Translink to have the necessary Personal Data, you will not be able to use age discount at urban and regional transport.

### **First time travelling with your Debit Card**

The first time you check in with your Debit Card, an automatic check is made to determine whether that Debit Card is linked to a public transport service in the Netherlands. This also occurs if in the past 14 days you have not used the Debit Card in question for travel, and subsequently check in again.

Translink will also check with the Bank that holds your Debit Card, if the card has been blocked. If this 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.

### **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 to ensure that the OV-pas has sufficient balance to be able to travel with public transport. The minimum required balance for travelling may differ per Public Transport Operator and is determined by that Public Transport Operator in its terms and conditions.

Each time you check in with your Debit Card or OV-pas, an automatic check will be performed against a deny list at Translink to ensure that the card has not been blocked. The deny list is managed by Translink and distributed to the Public Transport Operators. A Debit Card or OV-pas will be added to this list by Translink if:

- it appears that the card that you are using on public transport is on an alert list of the Bank or bunq respectively, e.g. because it is listed as stolen or missing;
- settlement for the card has not taken place for the use of public transport, e.g. because the balance on your Bank Account Card was insufficient at the time of settlement;
- A product or profiles granting you a discount is used while not respecting the applicable terms and conditions.

## **C. Payment**

### **Payment 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 EMS<sup>3</sup> and your Bank the payment for the trips made by you. During the night following the Travel Day on which you travelled, the amount due for all the journeys you made in one Travel Day is presented in one sum to EMS and then to your Bank. To process the payment, Translink provides the Technical data and Payment reference number to the Bank.

Upon successful payment, you will see the amount debited on your account statement, and will receive your unique Payment reference number for each day you travelled. This Payment reference number is created uniquely per daily payment and is preceded by the letters 'NLOV'. You can find your account statement by logging into your secure Banking environment.

This means that if you share your Payment reference number and related amount with another person or organisation, this person or organisation can get insight in the trips made by you.

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<sup>3</sup> European Merchant Services B.V. ("EMS"), [www.emspay.com](http://www.emspay.com)

During the Travel Day the amount due for travelling will be debited, if the amount exceeds a predetermined limit as set by the Public Transport Operators. The amount due for all journeys will then directly be debited against your balance. Following a successful payment, any other journeys you make will be presented to the Bank during the night following your Travel Day, unless the predetermined limit has been reached again.

### **Paying with your OV-pas.**

When checking in and out with an OV-pas, Translink calculates the fare for the journeys you make. After checking out, your Monetary account linked to your OV-pas will be debited directly for the costs related to your journey. To process the payment, Translink provides the Technical data to bunq. After a successful payment you will directly have an overview of the amount debited in the OVpay app and at [www.ovpay.nl](http://www.ovpay.nl).

### **Summary reports**

All Transport Operators receive 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 Transport Operator. Translink ensures that every Public Transport Operator receive daily all payments made for all travels made by Debit Cards. For all travels made by the OV-pas, the Public Transport Operators and bunq have made arrangements to ensure that the related payments are made on a daily basis by bunq as well.

### **Unsuccessful payment**

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

### **Amount due for Debit Card**

Translink may issue repeated payment requests to debit the amount due from your account within a period of 62 calendar days. The block will be lifted if the payment is successful.

Both during and after this period, you as a passenger can also pay the outstanding amount yourself. To do so, you have to present your Debit Card at a card reader. A payment request will be made to your Bank via Translink. You can also pay the outstanding amount in the App via your account. Via EMS a payment request will be made to your Bank. If the payment is successful for one of those methods, you will again be able to travel with your Debit Card approximately 15 minutes later.

### **Amount due for OV-pas**

To lift the block on your OV-pas you can pay the outstanding amount in the OVpay app. Via EMS a payment request will be made to your Bank. If the payment succeeds, you will then be able to travel again with your OV-pas approximately 15 minutes later. This also requires the OV-pas to have at least the minimum required balance needed for traveling

### **Block on travel use**

The block on using a OV-pas or Debit Card to travel can be checked by holding your card to a card reader of a Transport Operator and by reading the notification on the display or by contacting OVpay customer care. While the OV-pas or any travel use of the Debit Card is blocked, you can of course still use another regular (Transport) Ticket for travelling by public transport.



## **D. 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 all the previous journeys you have undertaken. You can view and request (parts of) your journeys in the Transdev App or via the Customer care. You can also view and request (parts of) your journeys 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. For your OV-pas you need the OV-pas number and verification code. Both are printed on your OV-pas.

### **App and website**

Within both the Transdev App and the OVpay App, you can link your Debit Cards and/ or OV-passes to the App. You can do this in various ways. First you will create an account with your own password. For linking your Debit Card you can add the Payment reference number and corresponding amount to this account. However, this only works within 31 days of travelling and when you made a contactless payment for your travel. For linking the OV-pas you can add your OV-pasnumber and the verification number to the account. Another way to link your Debit Card or OV-pas in the Ovpay app is by entering the PAN and expiration date of your Debit Card or OV-pas at your online account and then use your card for travelling. Furthermore, you can also enter your IBAN and expiration date of your Debit Card at your online account and then use your Debit Card for travelling within 60 days. Linking based on IBAN is not possible for the OV-pas.

In the Transdev App you can view your Transdev travel history for the past 18 months. Via your online account it is amongst others possible to check if you did check in and/ or check-out, to view the fare for travels you made and to also view your payments, payments status and any contingent blocking of your Debit Card and/ or OV-pas.

Among the items you can view in the OVpay app is the complete travel history of journeys you have made in the past 18 months using your Debit Card and/ or OV-pas 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 Operator, also for the past 18 months. In the OVpay app, you can also set to receive notifications when checking in and checking out and for any outstanding amount. In the Ovpay app you can also correct any missed check-ins or check-outs and pay for any outstanding amount for travelling.

On the ovpay.nl website, with a Payment reference number and corresponding amount, you can only view the journeys relating to this specific payment.

### **Customer care**

Questions about travelling with a Debit Card can be put to Transdev customer care or to OVpay customer care. Customer-care employees cannot view your Debit Card details, or the details of your payment account.

A customer-care representative will always specifically ask for your details if this is necessary in order to answer your questions. The customer-care staff may ask for your Payment reference number and the corresponding debit amount, depending on the questions you ask.

### **Cross Service**

The Transport Operators and Translink have signed mutual agreements so that Transdev can also help you with questions about a journey with other Transport Operators. It has been agreed that you may contact the

Customer Care services of any Transport Operator with questions concerning all the journeys and transactions you have made during the past 62 days. Questions about a missed check-in or check-out can be put to OVpay customer care. Our service staff are only given access to the data they need to have, to be able to answer your questions.

### **E. Inspection**

Anyone using public transport must have a valid (Transport) Ticket. If you check in with your Debit Card or OV-pas, your (Transport) Ticket has been linked to your Debit Card via a registration at Translink. Special detection inspectors ('BOA' in Dutch) conduct regular checks in the vehicles and at stops and stations to check if passengers have a valid (Transport) Ticket. This includes conducting checks on the validity of your discount product and discount profile. If an inspector wishes to check your (Transport) Ticket, you must present your Debit Card or OV-pas to the inspector's inspection device.

To enable the inspector to also show you leniency and/or provide a 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 Debit Card or OV-pas is held against the inspection device or if the inspection app is closed.

When using a discount product or profile, then this will be visible at inspection for the inspector. This product or profile is however only visible when these are applicable for your current journey. In all other cases, this product or profile will not be visible for the inspector.

If the data provided by you for the discount product or profile are not correct, the inspector can block this discount product or profile. You are then unable to further use it. At the OVpay app or via OVpay customer care you can correct your data after which you are again able to use the discount product or profile.

## Part 3 - Privacy rights and more 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 Transport Operators and Translink are Joint Controllers for processing Personal Data relating to travel using your contactless Debit Card, for the following processes and the associated Personal Data:

Process	Purpose	Personal data	Retention period
Tapping  <i>Lawful basis: performance of contract</i>	Status check Debit Card or OV-pas and validation of tap	Technical data (PAN, PAN serial number and validity date); Tap data.	Maximum 24 hours
Processing taps (transaction processing)  <i>Lawful basis: performance of contract</i>	- Processing of taps - Qualifying of taps: tap-in/ tap-out/ tap-driven debt recovery - Compiling journeys based on check-in/check-out (travel transaction data); determining the fare price; 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
Central passenger support (self-service) – with or without service account  <i>Lawful basis: performance of contract</i>	- Giving passengers insight into travel and payment transactions and outstanding debt via OVpay website and OVpay app; - Facilitating missed check-out via website, OVpay app and OVpay Customer Care; - Creating discount profile to receive discount at urban and regional transport	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 discount product.

Process	Purpose	Personal data	Retention period
	when travelling with a Debit card or OV-pas; - Purchasing a (personal) discount product and applying such when travelling with a Debit card.		
Decentral passenger support (self-service) – with service account at Public Transport Operator  <i>Lawful basis: performance of contract</i>	Giving data subjects insight via Transport Operator's website/app into: i) travel and payment transactions and outstanding debt at the Transport Operator in question (transactions in the past 18 months); ii) outstanding debt and the underlying transactions (if any) with other Transport Operator.	Payment reference number; Payment transaction data; Outstanding debt; Travel transaction data.	Until service is provided. No data is left behind on the website and in the app of the Transport Operator.
Decentralised passenger support service via customer care – Cross Service  <i>Lawful basis: legitimate interests of Transport Operators and Translink</i>	Via Customer Care (counter or telephone) of Transport Operator (Cross Service) to inform data subjects about: i) outstanding debt; ii) travel and payment transactions at the Transport Operator in question (past 18 months) iii) travel and payment transactions at other Transport Operators (Cross Service) in the past 62 days.	Payment reference number; Payment transaction data; Outstanding debt; Travel transaction data.	Until service is provided. Transport Operators' customer care only has view on transaction data.
Inspection/checking of valid ticket  <i>Lawful basis: performance of contract</i>	i) 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 discount product and/ or profile; ii) If there is no valid check-in or check-out, verification of the last ten public-transport transactions with the same payment card in order to determine follow-up action by the Transport Operator.	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 the inspection device receives a reply that the Debit Card or OV-pas has been tapped in/out and 5 minutes have passed, or if another Debit Card or OV-pas is presented for inspection, or the inspection (app) is closed.
Mobile service to passengers	Upon request from a passenger, the inspector can scan the Debit Card or	Technical data (PAN, PAN serial number and validity date); pseudonymisation	

Process	Purpose	Personal data	Retention period
<i>Lawful basis: Performance of a contract; legitimate interests of Public transport operators and Translink</i>	OV-pas to provide information on the last ten travel transactions made on public transport using the same card.	tokens; travel transaction data.	
Composing and delivering of feedback reports regarding processing of travel transactions  <i>Lawful basis: Legitimate interest of Public transport operators and Translink. Legal obligation Public transport operators</i>	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)

### Translink and bunq

Translink and bunq are Joint controllers for processing Personal Data relating to producing and delivering the physical OV-pas. The conditions are established in a mutual agreement between both parties. The Joint controllership relates to the following process and the associated Personal Data:

Process:	Producing and delivering physical OV-pas;
Legal ground:	Performance of a contract;
Purpose:	Producing and delivering a physical OV-pas;
Retention period:	30 days (name and delivery address);
Personal data:	Name and delivery address; pseudonymisation-tokens; Technical data (PAN, PAR, validity date, card number, card verification code).

### B. Contact details

For any questions, requests or complaints regarding travelling with a Debit Card, you may contact:

Transdev Customer Care:

Telephone number: 0900-8686

Can be reached by phone Monday to Saturday from 7 a.m. to 8 p.m.

Contact form at [www.transdev.nl/klantenservice/contact](http://www.transdev.nl/klantenservice/contact)

Transdev Service counter at Stationsplein 13 in Hilversum (open Monday to Friday from 8 a.m. to 6 p.m.)<sup>4</sup>

Connexion customer care:

Telephone number: 0900-2666399

Can be reached by phone Monday to Saturday from 8 a.m. to 7 p.m.

Contact form at [www.connexion.nl/klantenservice/contact](http://www.connexion.nl/klantenservice/contact)

For any questions on travelling with a Debit Card in general, you may contact:

OVpay customer care:

Telephone number: 0900-1433

<sup>4</sup>Opening hours may change during holiday periods and on bank holidays.

Contact form at [www.ovpay.nl/contact](http://www.ovpay.nl/contact)

Can be reached Monday to Saturday from 9 a.m. to 5 p.m.

If you want more information on how Transdev or Translink handles your Personal Data, you may contact the data protection officer of either organisation:

Transdev:

[privacy@transdev.nl](mailto:privacy@transdev.nl)

Translink:

[fg@translink.nl](mailto:fg@translink.nl)

### **C. The Lawful Bases for Processing**

When you check in and out with your Debit Card or OV-pas, the lawful basis for the Processing of Personal Data is the performance of a contract. The contract in question is the transport agreement to which the General Terms and Conditions of Urban and Regional Transport apply as well as either the 'OVpay Check-in/out Conditions Using your Debit Card and Credit Card' or the 'General OV-pas Conditions', depending on which token you are using.

The legitimate interests of the Transport Operators and Translink form the lawful basis for providing a cross service. We want to answer your questions as efficiently as possible through a single desk rather than several. It is in your interest as well as that of the Transport Operators and Translink that we are able to deal as efficiently as possible with your questions at various Transport Operators.

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

Managing of deny lists by Translink and distributing these to Public transport operators is based on legitimate interest.

### **D. With whom do we share your Personal Data?**

The Public Transport Operators and Translink make use of the services of Processors. We always sign written agreements with our Processors. We do this 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 your Personal Data.

Translink engages the services of EMS ([www.emspay.nl](http://www.emspay.nl)) to handle payments with your Bank. Translink shares the Technical data and the Payment Reference number with EMS. EMS Processes this data in its capacity as Controller.

bunq is the issuer and owner of the OV-pas. Translink engages the services of bunq for handling payments of your OV-pas. To process the payment, Translink provides Technical data, the amounts charged for travelling and topping-ups and withdrawals for the OV-pas. bunq is the Controller for Processing these data. Its purposes are (i) creating and managing a monetary account for travelling with the OV-pas and (ii) issuing a physical or mobile OV-pas, including token. Please see [www.ovpay.nl/privacy](http://www.ovpay.nl/privacy) for the full privacy statement of bunq in relation to the OV-pas.

Translink makes use of the services of iProov<sup>5</sup> 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 at urban and regional transport. iProov Processes this data as a Processor.

In certain cases, Transport Operators and Translink have a statutory and regulatory obligation to share your data with third parties, for example in the case of criminal proceedings in a court.

#### **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 regarding the Processing of Personal Data**

You may send complaints about the Processing of your Personal Data to Transdev or Translink. See the contact detail above (Part 3 - B). You also have the right to lodge a complaint with the supervisory authority, the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). For contact details, see the website of the Dutch Data Protection Authority: [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl).

#### **H. Automated decisions**

Automated decisions are made in three cases; if a fare is still owed, if the Debit Card has been blocked by a Bank and if an OV-pas has been registered as stolen or lost.

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<sup>5</sup> iProov Ltd, [www.iproov.com](http://www.iproov.com).

**A fare that is still payable**

As a passenger, you always have to pay the fare that is due. If the processing of your payment fails, the OV-pas or travel function of the Debit 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 Debit Card or OV-pas is blocked. This can be done via OVPay customer care. The customer care agent will examine why the Debit Card or OV-pas was blocked, and will unblock the card if warranted.

**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 the 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 Transport Operators and Translink cannot change this block. If you have any questions in this regard, please contact your Bank.

**A lost or stolen blocked OV-pas**

If an OV-pas has been registered as stolen or lost by OVPay Customer care, it will automatically be blocked. This can't be undone. Also, if you retrieve your OV-pas, you have to apply for a new one.

**I. Security of Personal Data**

The Public Transport Operators, Translink and bunq will secure your Personal Data, for example against unauthorised access, loss and theft. We do our utmost to secure your Personal Data against unauthorised access, loss or theft. All parties have policies in place for making public transport payments using the OV-pas and/ or Debit Card in such a way that an appropriate level of security is applied by default.

Translink makes use of the services of iProov<sup>6</sup> 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 at urban and regional transport. iProov Processes this data as a Processor.

Transport Operators, Translink and bunq apply PCI DSS for the security of Debit Card and OV-pas details. This is an international information security standard. This standard seeks to protect payment card details and prevent misuse of card information and, by extension, damage.

Your Technical data will only be Processed in card readers at Transdev and in the central administration system of Translink in Pseudonymised form.

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<sup>6</sup> iProov Ltd, [www.iproov.com](http://www.iproov.com)