

Privacy Notice

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR. This Privacy Notice is prepared to outline that information collected from customer contacts in relation to sales and marketing activities.

2. Responsibilities

2.1 The Data Protection Officer (DPO) / Information Systems Security Officer (ISSO) is responsible for ensuring that this notice is made available to data subjects prior to Flowbird Transport Ltd collecting/processing their personal data.

2.2 All Employees/Staff of Flowbird Transport Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

Flowbird provide equipment and services globally to help bus, rail, tram and ferry operators optimise efficiency through automatic fare collection platforms, fleet management systems, hosted back offices and real time information technology. Bringing these transportation solutions together provides transit authorities and transport operators with a future-proof pathway to optimal performance, ensuring that technology always keeps pace with the needs of customers receiving information from us linked to automatic fare collection, ticketing, analytics, real-time information and back office systems.

Our Data Protection Officer (DPO) / Information Systems Security Officer (ISSO) and data protection representatives can be contacted directly here:

- Information Systems Security Officer (ISSO)
uk.isso.transport@flowbird.group tel +44 (0)1202339339
- Data Protection Officer (DPO)
luc.porchon@flowbird.group tel +33 (0)629962032

The personal data we would like to collect from/process on you is:

| | |
|---------------------------------|---|
| Personal data type: | Source (where Flowbird Transport Ltd obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources): |
| Identity Data | Direct Source |
| Contact Data | Direct Source |
| Technical Data | Cookies |
| Marketing & Communications Data | Direct Source |

The personal data we collect will be used for the following purposes:

- Maintaining business relationships
- Processing contractual agreements

Our legal basis for processing for the personal data is for one or more of:

- consent obtained from the data subject;
- performance of a contract where the data subject is a party;
- legal obligation that Flowbird Transport Ltd is required to meet;
- protect the vital interests of the data subject, including the protection of rights and freedoms;
- official authority of Flowbird Transport Ltd or to carry out the processing that is in the public interest;
- necessary for the legitimate interests of the data controller or third party, unless the processing is overridden by the vital interests, including rights and freedoms;
- national law.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Maintenance of marketing and communications activities

The special categories of personal data concerned are:

- None

3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Flowbird Transport Ltd to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by in line with Withdrawal of Consent Procedure GDPR DOC 2.7A (available on request) or via our website.

3.3 Disclosure

Flowbird Transport Ltd will not pass on your personal data to third parties without first obtaining your consent.

Flowbird engage Harvest Marketing Communications for the purposes of public relations and marketing support services and collate customer data.

3.4 Retention period

Flowbird Transport Ltd will process personal data only for the period of time necessary to fulfill contractual and statutory requirements and will store the personal data for the time declared in our Retention Period Procedure.

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Flowbird Transport Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.3 above) in the processing of your personal data.

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Flowbird Transport Ltd (or third parties as described in 3.3

above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Flowbird Transport Ltd's data protection representatives Data Protection Officer (DPO) / Information Systems Security Officer (ISSO).

The details for each of these contacts are:

| | Supervisory authority contact details | Data Protection Officer (DPO) / Information Systems Security Officer (ISSO) contact details |
|--------------|---|--|
| Contact Name | Commission Nationale de L'Infomatique et des Libertes | Luc Porchon |
| Address | 3 Place de Fontenoy TSA 80715 75334 PARIS CEDEX 07 France: | Flowbird S.A.S. Parc la Fayette 6 rue Isaac Newton 25075 Besançon Cedex 9 France |
| Email | | luc.porchon@flowbird.group |
| Telephone | +33 (0)153732222 | +33629962032 |

4. UK Online privacy statement

Introduction

The EU General Data Protection Regulation ("GDPR") is in force across the European Union from 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The 21st Century brings with it broader use of technology, new definitions of what constitutes personal data, and an increase in cross-border processing. The GDPR aims to standardise data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

Our Commitment

Flowbird Transport Ltd. are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection.

Flowbird Transport Ltd. are dedicated to safeguarding the personal information under our remit and in maintaining a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation.

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

How we use your information

This privacy notice tells you how we, Flowbird Transport Ltd, will collect and use your personal data for the purposes of sales, marketing and customer relationship maintenance.

Why does Flowbird Transport Ltd. need to collect and store personal data?

In order for us to provide you with product and service information we need to collect personal data for correspondence purposes and provision of relevant information you have expressed an interest in. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

Will Flowbird Transport Ltd. share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Flowbird Transport Ltd. in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Flowbird Transport Ltd's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will Flowbird Transport Ltd. use the personal data it collects about me?

Flowbird Transport Ltd. will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Flowbird Transport Ltd. is required to retain

information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Flowbird Transport Ltd. contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

Flowbird Transport Ltd at your request, can confirm what information we hold about you and how it is processed. If Flowbird Transport Ltd. does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Flowbird Transport Ltd. or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Flowbird Transport Ltd. accepts the following forms of ID when information on your personal data is requested: Passport, driving licence, birth certificate, utility bill (from last 3 months).

Contact details of the Data Protection Officer / Information Systems Security Officer (ISSO):

| | Data Protection Officer / Information Systems Security Officer (ISSO) GDPR Owner contact details |
|--------------|---|
| Contact Name | Information Systems Security Officer |
| Address | Flowbird Transport Ltd 10 Willis Way Poole Dorset BH15 3SS |
| Email | Uk-isso-transport@flowbird.group |
| Telephone | 01202 339339 |

Document Owner and Approval

The Data Protection Officer (DPO) / Information Systems Security Officer (ISSO) is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to members of staff and interested parties on request.

Change History Record

| Issue | Description of change | Approval | Date of Issue |
|--------------|------------------------------|-----------------|----------------------|
| 1 | Initial Issue | Head of Service | 23/05/18 |
| 2 | Update legal entity | Head of Service | 02/01/19 |
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