

PRIVACY AND COOKIE POLICY – REJSEKORT A/S

DATA CONTROLLER

Rejsekort A/S is data controller in accordance with applicable personal data protection legislation of personal data registered within the Rejsekort system and associated systems, including personal data registered via the website, www.rejsekort.dk. Our contact information are:

Rejsekort A/S
Automatikvej 1
2860 Søborg
Company registration number: 27 33 20 72

Rejsekort A/S' DPO (data protection officer) can be contacted at DPO@rejsekort.dk or by phone 70 20 40 08.

Please see section 7 below for further contact information.

PRIVACY POLICY OF REJSEKORT A/S

It is significant to Rejsekort A/S that you as a customer of Rejsekort A/S feel safe and secure when using the rejsekort system and associated systems.

We handle responsibly the data you provide for us and the data that we collect from your use of your rejsekort with respect for your private life and in accordance with applicable laws, including the Data Protection Regulation.

This privacy policy clarifies how we process your data.

The latest date of updates and/or amendments of the privacy policy will always appear in the upper part of the privacy policy.

If you prefer that Rejsekort A/S does not process your personal data, you can purchase a rejsekort anonymous. Read more at www.rejsekort.dk.

'Rejsekort' means all types of travel cards issued by Rejsekort A/S, including commuter cards, youth cards and school cards.

1. **Which data does Rejsekort A/S collect and how are they used?**

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1.1 **Data related to registering you as a customer and the purchase of a rejsekort, and customer service**

We register the data you provide either when filing in a physical order form or when entering information in connection with ordering on www.rejsekort.dk (for example name, contact information, personal no and possibly photo), or are disclosed to Rejsekort A/S in connection to school card orders.

For business customers, this applies to the information submitted about the company's contact person. For school cards, this applies to the information submitted on school card users.

We store personal data submitted to Rejsekort Customer Centre which have a relevance for the customer relationship. We store your personal data in order to manage and serve you as a customer, or in order to manage and serve a company as a customer, and to comply with the applicable laws.

Rejsekort A/s processes mainly regular personal data. However, the registration of customer type "handicap" is a special category of personal data, which you consent specifically to.

1.2 **Data regarding your rejsekort, pendlerkort and reload/renewal agreements**

Rejsekort A/S registers data about your rejsekort and your reload/renewal agreements.

Data about your cards and reload/renewal agreements are registered in order to manage and serve you as a customer.

Rejsekort A/S registers data about the purchase of a rejsekort, the selected type of card, the card number, the selected type of customer, as well as other data attached to the rejsekort, e.g. expiration date.

Rejsekort A/S registers data about your reload/renewal agreements, including the selected reload amount, and also the type of payment card attached to the reload/renewal agreement or data about other forms of payment, e.g. the Danish payments system 'Betalingsservice' (BS).

Rejsekort A/S does not register your payment card number or the CVC code, when you pay with a payment card. Only the type of the card and the expiration date are registered.

The payment itself is processed through Nets A/S. When typing in or informing about your card number, expiration date and CVC code, the data are registered in Nets' systems, providing a high level of safety against unauthorized persons gaining access to confidential information. Please also see section 2 below.

1.3 **Data regarding your reloads, renewals and travels**

Rejsekort A/S registers the reloads, renewals and travels you conduct by using your rejsekort.

Rejsekort A/S registers the following data related to reloads/renewals of your rejsekort:

- The amount and the balance of the rejsekort.
- The payment method, meaning whether you pay cash, your bank account number if this is used for payment, or the type of payment card used (Rejsekort A/S does not register the number of the payment card, please see section 1.2 above).
- The time and place of payment, and also which transport company that has received the payment.

Data regarding your reloads/renewals are registered in order to serve you as a customer, including among other things, in order to settle accounts with you and to settle accounts with the places of sale and the transport companies. Furthermore, the registration is done to comply with the applicable laws, including the Payment Act.

Rejsekort A/S registers the following information related to your travels:

- Time and place for check-in, check-out and inspection.
- Selected customer type, price and balance.

Data related to your travels are registered in order to serve you as a customer and to document the prices of the travels to you. Furthermore, the data related to your travels are registered with the purpose to discover and prevent fraud and to comply with the applicable laws, including the Book keeping Act and the Payment Act.

The data regarding the conducted travels are furthermore used – mainly anonymously - by the affiliated transport companies for planning purposes, including traffic planning, which includes how time tables, number of busses, trains, etc. are organized. The anonymous data regarding conducted travels are furthermore used when considering the pricing, and also when distributing the revenue between the transport companies.

Please also see section 7 below, as well as the Rejsekort Terms and Conditions to get further information about your access to the registered data.

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1.4 **Data regarding potential registration in the Customer Register or on the Blocking List**

When your rejsekort or pendlerkort gets blocked by either you or Rejsekort A/S, information about the card number, the date of the blocking, the person who blocked the card and the reason for the block is registered.

You can find more information about the rules for blocking a rejsekort or pendlerkort in the Rejsekort Terms and Conditions.

Under certain circumstances, Rejsekort A/S can register a customer in the Customer Register, e.g. if the customer has unpaid debts, if the customer has failed to check out several times or there is justified suspicion of misuse.

For more information, please see the rules governing registering in the Customer Register in the Terms and Conditions for Rejsekort.

2. **Who can access personal data?**

Employees with Rejsekort A/S and with the affiliated transport companies, whose job it is to serve you as a customer and process your personal data, have access to the collected personal data. These employees only have access to see and use your data to the extent this is necessary in order to serve and administer you as a customer or to comply with the applicable laws. This includes the following selected companies and data processors or sub-data processors for Rejsekort A/S:

Affiliated transport companies:

Through the rejsekort system, employees with the affiliated transport companies, have access to data, which are necessary in order to serve and administer the customers in relation to rejsekort. This includes the last current 13 months of travel history and data regarding name, date of birth and contact information, data regarding your rejsekort and reload/renewal agreements, but not data regarding your credit cards used to pay for the reload/renewal agreements.

In case of telephone contact with the Rejsekort Customer Center, your calls may also be recorded if you consent to this. The recordings are used for documentation and educational purposes and are deleted immediately after 30 days.

The affiliated transport companies are: Arriva Tog, FynBus, DSB, Metroselskabet I/S, Midttrafik, Nordjyllands Trafikselskab, Sydtrafik A/S og Trafikselskabet Movia.

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Partners of the transport companies that are responsible for the sale of rejsekort and pendlerkort (please see <http://www.rejsekort.dk/koeb-rejsekort/salgssteder.aspx>), handle customer information when issuing, reloading and servicing rejsekort. By clicking on the link above, you will find a list of all places of sale.

The IT supplier:

The IT supplier has delivered the rejsekort system and is in charge of the service as well as the operation of the system for Rejsekort A/S.

The card manufacturer for Rejsekort A/S

When ordering Rejsekort (not Rejsekort Anonymous) the manufacturer receives name and possibly a photo. This information is only used for the manufacturing of the card, and is not kept by the manufacturer.

Opinion-research institutes:

Rejsekort A/S information about customers (name, address and e-mail address) to the opinion-research institutes, with the purpose of carrying out customer satisfaction surveys regarding rejsekort. The opinion-research institutes are bound to delete received information about the customers, when the task is done.

Communication to the customers

Rejsekort A/S' data processors have access to the necessary information in order to distribute e-mails, text messages and letters on behalf of Rejsekort A/S.

Nets A/S:

Payment made on www.rejsekort.dk is carried out entirely in the system of Nets. When a payment is carried out, Nets A/S will receive data. Nets A/S meets the requirements of safety from exploitation of card information.

Transmission of data

Rejsekort A/S passes - if applicable - your personal data to the affiliated companies, for the purpose of their independent handling of control fees, recovery cases, customer complaints, travel time guarantee cases, financial cases, analyzes and the like.

Rejsekort A/S also passes selected personal data to third parties in connection

with specific services related to the use of Rejsekort, including:

- Rejseplanen.dk: The customer can, by entering the rejsekort number in connection with a price search, find out what the price is with the current discount rate on their rejsekort.
- FlexDanmark: The customer can pay for his flex travels with his rejsekort by providing a rejsekort number.
- Arriva: In connection with the use of Pendler Plus

3. **Surveillance**

Rejsekort A/S monitors transactions carried out on the rejsekort. This is done in order to detect and prevent misuse and fraud.

4. **How and for how long do we keep your information?**

According to the applicable laws, including the Data Protection Regulation, your personal information must be kept safely and confidentially. We store your personal information in IT-systems with controlled and restricted access, and on servers that are placed at specifically secured facilities.

Data regarding you as a customer, your rejsekort and payment agreements, reloads, renewals and travels, as well as potential registrations on the Blocking List and in the Customer Register are kept for as long time, as is necessary to administer you as a customer, or furthermore to comply with the applicable laws, including the Payment Act, the Bookkeeping Act, and the Data Protection Regulation according to the table below:

Type of personal data	Storage time
Master data (name, cpr number, contact information etc.)	5 years after end of customer relationship
Information about your cards and reload- and renewal agreements, the chosen customer type, price and balance	5 years from the end of the year to which the transaction relates.
Information about your travels (e.g. check-in in Ballerup 21 October 2018 at 12.03 – check-out in Østerport 21. October 2018 at 12.30)	3 years after registration of data
Case information registered by contact to Rejsekort Customer Centre.	3 years after registration of data
Order forms	3 years after end of customer relationship

Recordings of phone calls to Rejsekort Customer Center.	30 days after the time of recording
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These deletion deadlines can be deviated from after a concrete assessment, so that data can be deleted either on an earlier or a later stage, if there are objective reasons for it.

5. **Legal basis**

The legal basis for our processing of your personal data is namely article 6, section 1, litra a) and article 9, section 2, litra a) (consent) in the Data Protection Regulation. The legal basis for processing of your personal number are also consent, see the Data Protection Act, § 11, section 2, nr. 2.

The legal basis for Rejsekort A/S's processing of information about contact persons in connection with Business cards and School cards is based on article 6, section 1, litra f) in the Data Protection Regulation.

Processing of information about school cards users is based on the Public School Act's rules on transportation of pupils or consent.

6. **The right to withdraw your consent**

You have a right to withdraw your consent. This can be done by contacting Rejsekort Customer Centre on the contact information below in section 7. If you choose to withdraw your consent it won't affect the legality of our processing of your personal data based on your earlier consent and up to the time of withdrawal.

You should be aware of, that our processing of data in most cases are necessary for you to be a customer at Rejsekort A/s and for us to serve you.

7. **Your rights**

According to the Data Protection Regulation you have a number of rights in relation to Rejsekort A/S' processing of your personal data. If you want to make use of these rights, you should contact us by using the contact information beneath. Your rights are the following:

The right of access

You have the right to obtain access of your personal data, which we are processing, as well as other information of our processing.

The right to rectification

You have the right to get incorrect data rectified. You also have the right to complete uncomplete data.

The right to erasure

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You have in some cases the right to get data about you erased, before our deletion deadlines are met.

The right to restriction of processing

You have in some cases the right to restrict the processing of your personal data. If this is the case, we are only allowed to process the personal data going forward – except for storage – with your consent, or in order for legal claims to be established, enforced or defended or to protect a person or important social interests.

The right to object

You have in some cases the right to object to our otherwise legal processing of your personal data. However, this only applies if our processing is based on article 6, section 1, litra f) in the Data Protection Regulation. You can also object to the processing of your personal data for direct marketing.

The right to data portability

You have in some cases the right to receive your personal data in a structured, commonly used and machine-readable format and have the right to have the data transmitted to another data controller without hindrance.

You can read more about your rights in Datatilsynet's guideline on the rights of the registered, which can be found on www.datatilsynet.dk

If you do not wish the processing of your personal data, we refer you to buy a Rejsekort Anonymous.

If you have any further questions regarding which data about you that is registered with Rejsekort A/S, and how it is processed, please contact:

Rejsekort Customer Centre, telephone 70 11 33 33

Via contact form on www.rejsekort.dk

By letter to:

Rejsekort Customer Center (Kundecenter)

Postboks 736

2500 Valby

Rejsekort A/S's Data Protection Officer:

DPO@rejsekort.dk

Phone: 70 20 40 08

8. **Data regarding the use of services on the website, www.rejsekort.dk**

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Overall, the website, www.rejsekort.dk, consists of two parts: an information part and a self-service part.

Data regarding the use of the information part:

Data identifying which parts of the website that are visited is accumulated in log files together with the IP address of the visitor. These data are used when further developing the website, thus optimizing it according to the customers' needs. Please also see section below regarding the use of cookies.

Data regarding the use of the self-service part:

For information regarding registration of personal data when purchasing a rejsekort, we refer to the description above.

When logging onto the self-service part of the website, it is possible to see most of the data Rejsekort A/S has registered about you, including data, which you have submitted when purchasing the rejsekort or later, and data regarding your conducted reloads/renewals and travelling.

8.1 **Cookies**

Rejsekort A/S uses cookies.

A cookie is a small text file, which is stored in your computer through your browser. The cookies used by Rejsekort A/S cannot contain virus and no personal data is stored, except IP addresses.

Rejsekort A/S uses cookies when you purchase a rejsekort/pendlerkort through the self-service page, when you contact the Rejsekort Customer Centre via a contact form and through Google Analytics (please see below).

When purchasing a rejsekort through the self-service page:

Cookies are essential for recalling your choices when purchasing a rejsekort/pendlerkort.

The cookies used when purchasing a rejsekort or pendlerkort are deleted after the completion of the purchase.

If you have deselected cookies, it is not possible to order a rejsekort or pendlerkort via www.rejsekort.dk.

Contacting the Rejsekort Customer Centre via a contact form:

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It is possible to contact the Rejsekort Customer Centre via www.rejsekort.dk – this can be done via a contact form on the website. This form is made in such a way that it can direct you to a guidance page, or a section with frequently asked questions (a so-called 'FAQ'). In case neither the guidance page nor the FAQ section can provide you with an answer to your request, you will be directed back to the contact form.

In connection to this, Rejsekort A/S uses cookies to ensure that you will be directed back exactly to that spot in the contact form where you were. Have you deselected cookies, this feature cannot be used.

Cookies used in the web contact form to the Rejsekort Customer Centre expire after a half hour, but are renewed after each visit.

How to avoid cookies:

If you do not wish to have cookies stored on your hard drive, it is possible to block all cookies, delete existing cookies from your hard drive or to receive a warning, before a cookie is saved. The following link provides a guide for your cookie settings in your browser/smartphone:

<http://www.aboutcookies.org.uk/managing-cookies>

It is always possible to use the 'help'-function in your browser to get more information on cookie settings. This is typically done by pressing the 'F1' on your PC. Search for 'cookies'.

Access to data from the cookies:

The employees with Rejsekort A/S, which are specifically authorized hereto, have access to the collected data. Furthermore, data as statistics and the like are passed on without specification of individual IP numbers to the affiliated transport companies, with the purpose of obtaining a better knowledge regarding the use of the website.

8.2 **Google Analytics**

Rejsekort A/S uses Google Analytics to analyze the activities on www.rejsekort.dk. This is done to optimize the website and make it more user-friendly. In connection to this, cookies, among other things, are used to keep statistics regarding the number of users, time spent on the website and also which sub-pages are visited.

In order to maintain this function, Google also leaves cookies in your hard drive.

The used IP address is passed on to Google for the use of Google Analytics surveys.

Please see section 8.1 above on how to avoid these cookies.

It is also possible generally to opt out of the Google Analytics surveys. For further information, please go to this link: <https://tools.google.com/dlpage/gaoptout>.

9. **Complaints regarding the collection and use of information**

You can file a complaint to the Data Protection Agency (Datatilsynet) about Rejsekort A/S' processing of your personal data.

The contact information for the Data Protection Agency follows below:

Datatilsynet
Borgergade 28, 5.
1300 København K
Telephone: 33 19 32 00
Fax: 33 19 32 18
Mail: dt@datatilsynet.dk
www.datatilsynet.dk

10. **Changes to this Privacy and Cookie policy**

This privacy policy can be altered.

The latest date of updates and/or amendments to the Privacy and Cookie Policy will always appear in the upper part of the privacy policy. In the event of significant changes, this will be announced by a noticeable message on www.rejsekort.dk.