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**BSEVC – Privacy Information Notice for registered passengers**

What is the purpose of this document?

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| BSEVC is committed to protecting the privacy and security of your personal information.  This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).  It applies to all registered passengers |

BSEVC is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

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| We will comply with data protection law. This says that the personal information we hold about you must be:  1. Used lawfully, fairly and in a transparent way.  2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.  3. Relevant to the purposes we have told you about and limited only to those purposes.  4. Accurate and kept up to date.  5. Kept only as long as necessary for the purposes we have told you about.  6. Kept securely. |

The kind of information we hold about you

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| Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).  There are "special categories" of more sensitive personal data which require a higher level of protection. |

We may collect, store, and use the following categories of personal information about you:

* Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
* Gender and Date of birth.
* Next of kin and emergency contact information.
* Compliments, complaints and suggestions

We may also collect, store and use the following "special categories" of more sensitive personal information:

* Information about your health, including any medical condition, health and sickness records.

How is your personal information collected?

We typically collect personal information about passengers through the registration process but also from time to time when your circumstances change and you inform us we will update your record

How we will use information about you

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| We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:  1. Where we need to carry out the service that you have registered to receive  2. Where we need to comply with a legal obligation.  We may also use your personal information in the following situations, which are likely to be rare:  1. Where we need to protect your interests (or someone else's interests).  2. Where it is needed in the public interest [or for official purposes]. |

**Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

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| "Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:  1. Where we need to carry out our legal obligations and in line with our data protection policy.  2. Where it is needed to ensure we provide you with the support you need to access the service you have registered for. For example your health or mobility needs. |

Data sharing

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| We share your data with employees of Aspire Together who have the same robust policies in place to ensure the safety of your data. Aspire Together provide the staff team to BSEVC to carry out our work, there are no direct employees of BSEVC  We share your data with volunteers of BSEVC who have a right to see such data in order to provide you with a service, such as your name, address, health needs and other contact information  We do not share, sell or offer any of your personal data with any other third party. |

Data security

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| We have put in place measures to protect the security of your information. Details of these measures are available upon request.  Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure. |

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from our data protection officer (DPO).

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention - How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We delete your personal information when

1. You, or a designated representative, instruct us to do so
2. When you have not used services for more than 2 years, although you can re-register at any time

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer registered with us we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Rights of access, correction, erasure, and restriction

**Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

**Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

* **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
* **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
* **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
* **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes
* **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing.

**No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection officer

We have appointed a data protection officer (DPO), David Finn, to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.