# Privacy Policy for Basiskort Valid from 6th October 2025 Version 1

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### 1. Data Controller

Rejsekort & Rejseplan A/S is the data controller for the processing of personal data in connection with the registration of data in the Rejsekort system and associated systems, including personal data registered via the Rejsekort app, Basiskort and the Self-Service solution as well as the website Rejsekort.dk

# 2. Privacy Policy for Basiskort

Rejsekort & Rejseplan A/S places great importance on you feeling safe as a customer with us and when using the Rejsekort system and associated systems.

Therefore, Rejsekort & Rejseplan A/S processes the data you provide to us, and which Rejsekort & Rejseplan A/S collects about you in connection with your use of Basiskort and the Rejsekort app, responsibly, with respect for your privacy and of course in accordance with applicable data protection regulations. You can read more about Rejsekort & Rejseplan A/S's processing of your personal data linked to the Rejsekort app in the Privacy Policy for the Rejsekort app.

You can read more about Rejsekort & Rejseplan A/S's processing of your data linked to the Basiskort in this privacy policy.

At the top of Rejsekort & Rejseplan A/S's privacy policy, you can always see when the policy was last updated and/or changed.

Basiskort is a physical card that you can use to purchase a valid ticket (travel entitlement) for public transport with the transport companies affiliated with Rejsekort & Rejseplan A/S's Basiskort solution. In addition, there is a Self-Service solution where you can manage your profile, including viewing and editing your information and ordering a Basiskort. For information about affiliated transport companies, refer to the Basiskort Terms and Conditions. The Rejsekort app is a mobile application developed by Rejsekort & Rejseplan A/S, in which you can also purchase a valid ticket (travel entitlement). Read more about the Rejsekort app.

In general, for registering as a customer in Basiskort and Rejsekort app You create a unique profile that will be used across Rejsekort & Rejseplan A/S's two products, Basiskort and the Rejsekort app.

This means that if you use both Basiskort and/or the Rejsekort app, you only need to create one profile. If you change your information, it will be reflected in your profile and visible in both products. If you travel via the Rejsekort app, Rejsekort & Rejseplan A/S will collect and store information about your journeys and transactions in accordance with the <u>Privacy Policy for the Rejsekort app</u>.

The Privacy Policy for Basiskort explains the specific rules for Basiskort. Some storage periods may be the same for the two products, but the data collected will vary, which is why there are two separate privacy policies for clarity.

https://www.rejsekort.dk/ https://www.rejsekort.dk/Det-Med-Smaat#privatlivs https://www.rejsekort.dk/Det-Med-Smaat#checkudvej

# 3. Contact Information for Data Controller and Data Protection Officer

Rejsekort & Rejseplan A/S is the data controller for the processing of personal data in Basiskort. Rejsekort & Rejseplan A/S's contact information is:

Rejsekort & Rejseplan A/S Automatikvej 1 2860 Søborg

CVR no.: 27 33 20 72

Rejsekort Customer Centre Phone: 70 11 33 33

Via contact form at rejsekort.dk

By post to: Rejsekort Customer Centre PO Box 736 2500 Valby

Contact information for Rejsekort & Rejseplan A/S's Data Protection Officer (DPO):

DPO@rejsekort.dk Phone: 70 20 40 08

Phone hours: Weekdays from 10am-3pm

# 4. What information do we collect and what is the purpose of the processing

Rejsekort & Rejseplan A/S registers the information you provide when creating your profile in the Self-Service solution as well as information you provide when purchasing a Basiskort. When you start using your Basiskort as valid travel entitlement, Rejsekort & Rejseplan A/S registers information about your travels/purchases.

Information when establishing a customer relationship

The information you provide when creating a profile includes:

- Your email address
- Your first and last name
- Your date of birth
- Information about the payment method linked to your profile

Additionally, a system-generated unique user ID is created and linked to your profile, and a customer type is assigned based on your date of birth.

# Information when purchasing a Basiskort

The information you provide when purchasing a Basiskort includes:

- Selected product (Basiskort)
- Delivery address (including C/O name on mailbox)
- Acceptance of card terms
- Information about linked payment method

Upon purchase, the system generates an order number and order status, as well as a card number for your Basiskort, which is linked to your profile.

Information when using the Basiskort as valid travel entitlement
Rejsekort & Rejseplan A/S registers the following in connection with your travels:

- Time and place of check-in and check-out and your journey by public transport (start and end station/stop, as well as intermediate stations/stops)
- For journeys where route calculation is not possible, only check-in and/or check-out time and location are registered
- Selected customer type and fare

The travel information is registered to provide you with valid travel entitlement while checked in and to serve you as a customer and document the travel cost. Additionally, the travel data is used to detect and prevent misuse of the Basiskort and to comply with applicable laws such as accounting and payment legislation.

# Travel and purchase history

Rejsekort & Rejseplan A/S retains your travel and purchase history for your Basiskort for 36 months. This allows you to continuously verify that your travels have been correctly calculated. You can view your travel history by logging into the Self-Service solution; your journeys and purchases will appear in the History view once you start using your Basiskort. This also allows the Rejsekort Customer Centre to assist you, for example, if you detect an error in your journey.

Your travel history includes information about completed journeys, and your purchase history includes information about completed payments.

### Information when contacting the Rejsekort Customer Centre

If you contact the Rejsekort Customer Centre via phone, the contact form in the Self-Service solution, or the website, Rejsekort & Rejseplan A/S will also store the relevant personal information you provide related to your customer relationship.

When contacting by phone, your calls may be recorded if you give explicit consent. These recordings are used for documentation and training purposes and are deleted after 30 days.

# 5. Information on profiling and fraud

In the Basiskort system, Rejsekort & Rejseplan A/S uses profiling to detect and prevent misuse of the Basiskort system.

Profiling is carried out by the system identifying misuse-like behavior based on completed journeys. Each journey is automatically checked for indications of misuse. The system assigns a point value (score) to each journey as an indicator of whether the travel pattern shows signs of misuse. Past behavior and scores are not considered in this calculation. The system stores all generated scores per customer, and these scores are used in potential manual case handling in cases of suspected misuse-like behavior.

A detailed description of the handling of misuse can be found in the <u>Basiskort Terms and</u> Conditions.

# 5.1 Information on possible profile blocking

Rejsekort & Rejseplan A/S may block a customer's profile under certain circumstances involving misuse-like behavior, and in such cases, Rejsekort & Rejseplan A/S will store information about the incident. Read more about the rules for blocking in the <u>Basiskort Terms and Conditions</u>.

# 6. Who has access to personal data?

Only employees with a work-related need at Rejsekort & Rejseplan A/S and the following data processors have access to the collected personal data:

This includes employees at:

# - Transport companies:

Relevant staff at the affiliated transport companies have access to information necessary for managing and servicing your customer relationship. This includes travel and payment history as well as information about you, such as name, date of birth, contact information, etc.

- o Affiliated transport companies include:
- GoCollective
- DSB
- Metroselskabet
- Fynbus
- Movia
- Nordjyllands Trafikselskab
- Midttrafik
- Sydtrafik

### - IT suppliers:

Rejsekort & Rejseplan A/S's IT suppliers act as data processors and have signed data processing agreements and confidentiality declarations obligating them to comply with data protection regulations and only process your information per Rejsekort & Rejseplan A/S's instructions.

Rejsekort & Rejseplan A/S's IT supplier, Fairtiq, delivers and operates the Basiskort and associated systems, while Idemia produces the physical cards and links relevant customer data.

Additionally, Rejsekort & Rejseplan A/S uses IT suppliers such as MailJet and Amazon Simple Email Service for sending emails, and Frisbii and Lector for handling payments and other case processing.

### 6.1 Disclosure of personal data

When you order a Basiskort, Rejsekort & Rejseplan A/S discloses an order number to the card producer along with information necessary for the production and delivery of the card, including your name and delivery address (including postal code). Once the card is produced, the order number, order status, and card number are forwarded to the Basiskort backend system.

If relevant, Rejsekort & Rejseplan A/S discloses necessary personal data, including travel history, travel fare, and number in pseudonymised form to the affiliated transport companies for the purposes of revenue sharing and settlement, as well as for their independent processing of financial matters, traffic analyses, and planning in accordance with the Public Transport Companies Act.

If relevant, Rejsekort & Rejseplan A/S discloses necessary personal data in immediately identifiable form to the affiliated transport companies for their independent handling of penalty fare cases, debt collection, customer complaints, travel guarantee cases, and financial matters. This disclosure is based on Article 6(1)(f) of the GDPR, as Rejsekort & Rejseplan A/S has a legitimate interest in safeguarding the transport companies' ability to recover their claims under agreements with customers, and this interest is not overridden by the interests of the customers.

Likewise, and only if relevant, Rejsekort & Rejseplan A/S discloses your personal data to public authorities, primarily the Danish Transport Authority, which among other responsibilities, handles revenue sharing for certain public transport income.

In addition, Rejsekort & Rejseplan A/S discloses relevant data about you, such as name, address, email address, and case number to research institutes Wilke, Epinion, and Axcessnordic for the purpose of conducting customer satisfaction surveys on our behalf. Participation in such surveys is voluntary. The research institutes are required to delete any received personal data once the task is completed. Rejsekort & Rejseplan A/S assesses that it is lawful to disclose necessary personal data to the named institutes as the surveys serve a compatible purpose, namely

continuous improvement of customer relationships and optimisation of Rejsekort & Rejseplan A/S's solutions and processes.

Rejsekort & Rejseplan A/S also discloses personal data in specific situations for use in research projects. Disclosure only occurs when Rejsekort & Rejseplan A/S specifically assesses it is lawful, serves a legitimate and appropriate purpose, and is ethically justifiable. The data is protected to the greatest extent possible, for example through pseudonymisation, where full anonymisation is not possible.

# 7. How and for how long does Rejsekort & Rejseplan A/S store your data?

Rejsekort & Rejseplan A/S stores your personal data in IT systems with controlled and limited access, and on servers located within the EU. We also protect your personal data with appropriate technical and organisational security measures from the time of collection until deletion.

Rejsekort & Rejseplan A/S retains data about you as a customer as long as necessary for the purposes mentioned under section 2, as per the table below:

Type of Personal Data	Retention Period	Legal Basis
Master data (name, age, etc.)	As long as you are a customer and up to 5 years after the end of the year in which the customer relationship ended (or inactive)	GDPR Art. 6(1)(b) while a customer; thereafter Danish Bookkeeping Act §12
Contact details (email and optional phone number)	As long as you are a customer and up to 3 years after your last journey	As long as you are a customer with us, GDPR Art. 6(1)(b). After the customer relationship ends, in accordance with GDPR Art. 6(1)(f), as we consider that we have a legitimate interest in being able to document this information in connection with any potential claim you may raise against us until the limitation period of 3 years has expired, cf. the Danish Limitation Act §3.

Information linked to your purchase and delivery of Basiskort	1 month after the order is received	GDPR Art. 6(1)(b)
Information about your customer type, fare, and card number	5 years from the end of the year the transaction relates to	GDPR Art. 6(1)(b) and Bookkeeping Act §12
Data on your journeys, including time and place of check-in and check-out and calculated route (start, end, and intermediate stops)	We store travel data (your journey in public transport) for 3 years from the date the information is recorded.  After this period, the travel data is stored in anonymised form for analytical purposes.	GDPR Art. 6(1)(f), as we consider that we have a legitimate interest in being able to document this information and the calculated route and price in connection with any potential claim you may raise against us until the limitation period of 3 years has expired, cf. the Danish Limitation Act §3.
Case data recorded when contacting Rejsekort Customer Centre via phone, contact form, or website	3 years from registration	GDPR Art. 6(1)(f), as we consider that we have a legitimate interest in being able to document this information in connection with any potential claim you may raise against us until the limitation period of 3 years has expired, cf. the Danish Limitation Act §3.
Recordings of phone calls to Rejsekort Customer Centre	30 days from the time of recording	Your consent, GDPR Art. 6(1)(a)

These deletion periods may, following a specific assessment, be deviated from so that personal data is deleted earlier or later if there are specific, legitimate reasons for doing so. For example, this may be the case if you request deletion and it has been a long time since you used your Basiskort to purchase a ticket/travel document. In such a case, your data may be deleted earlier than stated in the table. Conversely, if, for example, a court case is pending, the retention periods stated may, following a specific assessment, be extended beyond what is indicated in the table.

#### Transfer of data to third countries

Rejsekort & Rejseplan A/S only stores data on servers located within the EU. However, some suppliers are located outside the EU, specifically in Switzerland and the USA. The US supplier is part of the EU-U.S. Data Privacy Framework and thereby subject to the European Commission's adequacy decision from July 2023. Switzerland is also on the European Commission's list of safe third countries.

# 8. Your Rights

Under the General Data Protection Regulation (GDPR), you have several rights regarding Rejsekort & Rejseplan A/S's processing of your personal data. To exercise your rights, please contact us using the details provided above in section 1.

### Your rights are:

Right of access (right to view your data)

You have the right to access the personal data that Rejsekort & Rejseplan A/S processes about you.

# Right to rectification (correction)

You have the right to have incorrect information about yourself corrected. You also have the right to have your information supplemented with additional details if this will make your personal data more complete and/or up to date. You have the option to correct your profile information yourself directly in the Self-service solution.

# Right to erasure

In certain cases, you have the right to have your data deleted before the general deletion period by Rejsekort & Rejseplan A/S.

### Right to restriction of processing

In specific situations, you have the right to restrict the processing of your personal data. If this right applies, Rejsekort & Rejseplan A/S may only process your data – apart from storage – with your consent, or to establish, exercise, or defend legal claims, or to protect another person or important public interest.

### Right to object

You have the right in certain cases to object to Rejsekort & Rejseplan A/S's otherwise lawful processing of your personal data. This only applies if the processing is based on Article 6(1)(f) of the GDPR (legitimate interest). As outlined in this Privacy Policy, this includes data processed for the purpose of identifying and preventing misuse. If you object, Rejsekort & Rejseplan A/S may no longer process your data unless compelling legitimate grounds for the processing override your interests, rights, and freedoms, or the processing is necessary to establish, exercise, or defend legal claims.

#### Withdrawal of consent

If you have given consent, you have the right to withdraw it at any time. You can do so by contacting Rejsekort Customer Centre using the contact information provided in section 1. Withdrawing your consent does not affect the legality of processing based on your consent before withdrawal. Upon withdrawal, Rejsekort & Rejseplan A/S will as a rule limit future processing of your personal data by deleting or anonymising data that was processed based on your consent. As outlined in <a href="mailto:section 2 above">section 2 above</a>, this primarily concerns phone call recordings made when contacting the Rejsekort Customer Centre.

## Right to data portability

In certain situations, you have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit this data to another controller without hindrance.

# 9. Right to complain to the Danish Data Protection Agency

You can file a complaint about Rejsekort & Rejseplan A/S's processing of your personal data with the Danish Data Protection Agency.

The Agency's contact details are:

Datatilsynet Carl Jacobsens Vej 35 2500 Valby Phone: +45 33 19 32 00

Email: dt@datatilsynet.dk www.datatilsynet.dk

# 10. Changes to this Privacy Policy

Rejsekort & Rejseplan A/S regularly reviews this Privacy Policy to keep it up to date and in accordance with how the Basiskort and the Self-Service solution operate, as well as applicable principles and legislation.

The Privacy Policy may be changed without notice. At the top of this Privacy Policy, you can always see when it was last updated or amended. Significant changes to the Privacy Policy will be announced on Rejsekort & Rejseplan A/S's website <a href="https://www.rejsekort.dk">www.rejsekort.dk</a> or alongside an updated version of the Privacy Policy. You can also always find the latest version of the Privacy Policy by logging into the Self-Service solution.