

## PRIVACY NOTICE

### A. Contact information of the Controller and the DPO

#### Data Controller

Rejsekort & Rejseplan A/S

Automatikvej 1

DK-2860 Søborg

<https://www.rejsekort.dk/Kundecenter-privat/Kontaktformular>

#### Data Protection Officer

[dpo@rejsekort.dk](mailto:dpo@rejsekort.dk)

+45 70 20 40 08

### B. Data controllership and applicable law

RKRP is the controller in connection with the RKRP App («application») and processes personal data in accordance with

- the EU General Data Protection Regulation 2016/679 (GDPR), including the applicable data protection legislation of the EU member states, if the customer obtains services in the European Union or the European Economic Area; and

### C. Processed personal data

#### General information about the customer:

- First and last name, date of birth
- Mobile phone number
- Email address
- User ID
- IP-address and device ID
- Information on abusive or other fraudulent behaviour
- Interactions with customer care.

#### Travel data:

- Tracing and activity data (based on a motion sensor, if active)
- Bluetooth beacon signals
- Calculated journey.

The recording of travel data starts with opening the application and ends at the latest 5 minutes after the check-out process has been completed. The completion of the check-out process is signalled in the application.

#### Ticket data:

- Calculated fare
- Date and time.

#### Information about the device:

- Device: brand and model
- Operating system
- Battery level.

### D. Processing purposes and modalities

RKRP exclusively collects and processes data in connection with the testing and improvement of the application and the services during the test phase.

## E. Legal basis

In accordance with Art. 6(1)(a) of the General Data Protection Regulation (GDPR), the legal basis for processing personal data of users relies on obtaining their consent.

## F. Automated decision-making and profiling

In order to test fraud detection and management services, we are using automated decision-making processes and profiling mechanisms. Examples:

- The system checks whether the means of transport is in motion when check-in and check-out are performed to ensure that the complete journey is recorded and charged. If the system detects incorrect behaviour multiple times, the account is automatically blocked.
- If a past journey cannot be charged to the deposited means of payment, the check-in will automatically be blocked until the journey can be charged.

Affected persons have the right

- to request the intervention of a natural person in the decision-making process,
- to express their own point of view,
- to have the decision reviewed or challenged outside of the legal process.

## G. Security

RKRP protects personal data against foreseeable risks and unauthorised access with suitable technical and organisational measures. RKRP minimises the use of personal data.

## H. Data Transfer

To **service providers of RKRP**: Subprocessors in the European Union and Switzerland, in particular FAIRTIQ Ltd., Aarberggasse 29, 3011 Bern, Switzerland, commissioned by RKRP to operate and develop the application process the personal data of the customers (including storage). RKRP has entered into privacy agreements with these service providers to ensure the protection of personal data.

## I. Customer contact

RKRP is entitled to contact the customer concerning topics affecting the test phase. This includes:

- Information in connection with the offer or about its amendment
- Information to help customers use the application
- Questions towards the customers on the usage of the application

If the customer has given consent, RKRP is allowed to contact the customer concerning further offers and information not necessarily related to RKRP. The customer can revoke the consent at any time.

Depending on the type of contact, the messages may contain tracking pixels that enable a log file recording for the statistical evaluation of the contact. RKRP can see if and when a message has been opened and which links in the message have been activated.

The customer can unsubscribe from being contacted by writing RKRP at [drbeta@rejsekort.dk](mailto:drbeta@rejsekort.dk) or following the unsubscription link or the instructions in each message that RKRP sends to the customer.

## J. Data retention period

The personal data of the user will be deleted or anonymised as soon as the purpose of the data processing has been fulfilled.

#### **K. Right to erasure and to be forgotten**

Subject to the foregoing storage provision and if RKRP or a partner company does not require the data to safeguard and exercise their rights, the customer has the right to request the deletion of their personal data at any time.

#### **L. Correction and limitation**

The customer has the right to correct and limit the data stored for the respective customer account, if the data is faulty or a limitation does not affect the processing purposes. The customer can adjust the general account information directly in the applications.

Modifications are not possible during an ongoing journey.

#### **M. Information and transmission rights**

The customer has the right to request information about the data stored on the customer's account and its transmission.

#### **N. Right of objection**

The customer has the right to object at any time to the processing of personal data concerning them for reasons arising from their particular situation, if the data processing is carried out on the basis of art. 6 para. 1 lit. f GDPR. This also applies to profiling and automated decision making based on these provisions. If the customer objects, RKRP will no longer process their personal data unless compelling legitimate grounds for the processing can be demonstrated which override the interests, rights and freedoms of the customer, or the processing serves to assert, exercise or defend legal claims.

If the customer's personal data are processed for the purpose of direct marketing, the customer shall have the right to object at any time to the processing of personal data concerning them for the purpose of such marketing; this shall also apply to profiling insofar as it is related to such direct marketing. If the customer objects, their personal data will subsequently no longer be used for the purpose of direct advertising.

#### **O. Right to lodge a complaint**

Data subject rights are not absolute and may be subject to exemptions or derogations under applicable data protection laws.

The customer further has the right to lodge a complaint with the competent supervisory authority, as follows:

Datatilsynet

Carl Jacobsens Vej 35

2500 Valby

Tlf. 33 19 32 00

dt@datatilsynet.dk

#### **P. Data processing in the European Economic Area or a country with adequacy decision**

The Client acknowledges that all Personal Data will be processed in the EEA or any other country for which an adequacy decision has been issued by the European Commission.

#### **Q. Changes of this data protection declaration**

RKRP regularly checks this data protection notice. To be informed about the latest version, it is recommended to check it regularly in the application.