

# Shuttel Privacy Statement

Because Shuttel B.V. makes the protection of personal data an essential priority, we exercise the greatest possible care whenever we process your personal data. How we handle personal data is explained in this privacy statement.

## 1. Who is responsible for the processing of your data?

In this privacy statement, we, Shuttel B.V. (hereinafter “**Shuttel**” or “**we**”) explain how we process your personal data in our capacity of controller. We also describe where we receive data from other mobility services and third parties in the performance of our services, and what that data comprises.

A business public transport chip card is used to access public transportation. Translink Systems B.V. (hereinafter “**TLS**”) is the publisher of all business public transport chip cards in the Netherlands, and sets conditions on their use. The card conditions can be consulted at [www.shuttel.nl/nl/voorwaarden](http://www.shuttel.nl/nl/voorwaarden).

## 2. What is personal data?

Personal data is information that relates to an identified or identifiable natural person. Whether or not certain information should be regarded as personal data also depends on whether Shuttel has legal means that it can be reasonably assumed to use to identify a data subject.

## 3. Personal data that we process

We process your personal data because you provide us with data when you conclude an agreement with us but also when you use our services through your employer. As part of these services we receive data from, and may also provide data to, mobility services and other third parties as required for the performance of our services. These third parties are the controllers with respect to the personal data that they process and which they may provide to us. For more information about the way in which these third parties process your personal data and your rights in this regard, please see the privacy statements of the respective third parties.

### ***A) Data needed to issue you a Shuttel card***

Shuttel’s services may pertain to various mobility services such as public transport, parking, taxi, “OV fiets” bike rental, car sharing services and ride logging. After you enter into an agreement with Shuttel, for us to issue you a Shuttel card we need to process the following personal data:

- Your name, address, city of residence, date of birth, sex, personnel reference number used by your employer (if applicable), e-mail address and telephone number.
- Identifying data for the Shuttel card that you use, such as the card number, bar code on the card (if any), any code on the magnetic strip, and data encoded in the chip inside the Shuttel card.

### ***B) Data generated by your use of our services***

If you use the services of Shuttel or otherwise have contact with us, as part of our services we will, depending on your specific use, process the following data, which may or may not be regarded as personal data:

- Data you use to access the Shuttel app and portal, including user name, pin code, and password.
- Data concerning the use of the Shuttel card issued to you, such as time, location, route, class and cost of a travel transaction. As license holder of TLS, we receive data about the costs you incur on public transport journeys. TLS issues the business public transport chip card to you as card user.
- Your communication preferences and settings.
- If applicable, data we process in order to enable us to give you personalized travel recommendations in the app, including time, location, route and cost of the travel transaction you are planning.

- Surfing behaviour, established on the basis of our own observations or cookies (see also article 9 of this privacy statement).
- Information pertaining to your devices, such as MAC address, IP address or other identifying number.
- Customer satisfaction information.
- Data about your use of our customer service.

## ***C) Data we receive from affiliated mobility providers and third parties***

If applicable, we will receive data from other providers of mobility services that the Shuttel card grants you access to. We may correlate various data sets concerning the use of the Shuttel card. We may, for example, correlate your check-in and check-out transactions in order to display the information on a journey in the Shuttel portal. On the Shuttel portal you can retrieve various information including the data on the journeys you have made.

The data that we may receive from other mobility providers and which is necessary for the services include:

- The time, location, route, class and cost of a travel transaction. This data on the use of the Shuttel card issued to you will not be limited to travel and use transactions, but may also include service and sale transactions.
- Data pertaining to journey logs and other mobility services, such as location, route, travel time, start time, end time, speed, date, distance of travel with your Shuttel card, etc.

## ***D) Data processed via the GPS tracker in the Shuttel app***

As a card user, you can use the Shuttel app. With the app you can document your travel movements yourself, for example, by logging a journey you make by car or bicycle. This allows you to keep a log of your travel if you need to keep one to receive a per-kilometre travel reimbursement from your employer. In order to log your travel movements, you need to use the tracker functionality in the app via the GPS tracker. This functionality logs your movements using location data (GPS location) obtained from your mobile phone.

In order to use the tracker functionality, you must grant consent for the processing of your location data. As soon as you have granted this consent and turned on the GPS tracker using the Start button, your movements are logged by means of saving coordinates along the route you have travelled. These coordinates are only used to calculate the distance of the route you have travelled, and will not be visible in the app and/or the portal. Only the starting point, end point and distance covered will be shown. Your employer does not have access to the coordinates of your route.

You can revoke your consent in the privacy settings of your phone. If you do, you will no longer be able to log your travel movements until you grant consent again.

## **4. Processing: legal grounds and legitimate interests**

The personal data is processed on the basis of the following legal grounds:

1. Consent.
2. Performance of a contract with you.
3. Legal obligation.
4. Performance of a task in the public interest.
5. Legitimate interest of Shuttel or a third party.

Legitimate interests include, but are not limited to: safety and security, crime prevention, IT management, research and analysis of our products and services, business administration, legal affairs and internal management.

## **5. Purposes for the processing of personal data**

We exercise all due care in the processing of your personal data. We use only the data necessary to provide our services. Shuttel processes your personal data for the purposes set out below. The number or numbers given after each of the purposes listed corresponds to the ground or grounds referred to in article 4 of this privacy statement.

## **A) Card use-related purposes**

- The application for a new Shuttel card, the issue and sending of a Shuttel card, and the provision of a new Shuttel card when an existing card becomes defective or is lost or stolen. [ground 2]
- The conduct of the administration of the Shuttel card in order to meet financial and tax-related obligations, including the (collective) invoicing of the use of the Shuttel card. [grounds 2 or 3]
- The charging to the card holder and/or employer of costs of the use of the business public transport chip card. [ground 2]
- Communication with you and/or your employer for information purposes and for the provision of service (including the service desk). [grounds 2 or 5]
- The processing of and reporting (in the form of management information) on transactions and travel movements made with the Shuttel card to you and/or your employer. The information provided to your employer and the processing of personal data for management information purposes will not be directly traceable back to you. [grounds 2 or 5]
- If applicable, the performance for your employer of analysis of travel habits or other behaviour. [grounds 2 or 5]
- Automatic replenishing of the balance on your business public transport chip card. [ground 2]
- The provision to the card holder and/or employer of statements of the transactions performed and costs incurred thereby. Personal transactions and details of business transactions made will only be visible to the user. [ground 2]
- The provision of service to the card holder, for example in cases of loss or theft of the business public transport chip card. [ground 2]

## **B) General purposes**

- Building up and maintaining the customer relationship, including the maintenance of a direct relationship between Shuttel and the service partners. [ground 2]
- Processing orders (including invoicing), processing in the financial administration and for logistics purposes. [ground 2]
- Offering customer services, including services with regard to the purchase of products and services, and dealing with complaints and requests. [ground 2]
- In certain cases, maintaining communications with service partners from our network in order to proactively contact users in situations of faults or disruptions. [grounds 2 or 5]
- The processing of personal data into management information. [ground 2]
- Conducting market research, including measuring customer satisfaction, in order to improve our business operations, brands, products and services. [ground 5]
- Development and ongoing improvement of new and existing products and services. [ground 5]
- Fulfilling statutory obligations, settling disputes and enforcing our rights and agreements. [grounds 2, 3 or 5]
- Improving data quality by using address validation technologies. [ground 5]
- Analysing cookies of our websites in order to gear the contents of our communications to your personal preferences to the maximum possible extent. [grounds 1 or 5]

## **6. No processing of data of persons under the age of 16**

We do not intend to collect data from persons under the age of 16. We advise parents to monitor their children and their children's online activities to prevent Shuttel from processing their data.

## 7. Sharing with third parties

Shuttel shares your personal data with third parties in a number of situations, such as the situations listed here alongside the reason for the sharing. The number or numbers given after each corresponds to the ground or grounds referred to in article 4 of this privacy statement.

- Shuttel shares your data with your employer, if necessary, in order to allow your employer to use the data to pay your invoice and register your business travel movements. [ground 2]
- Shuttel provides your personal data to TLS, in order to allow the manufacture and issue of the business public transport chip card. We have a contract with TLS for this purpose. The business public transport chip card is issued on the basis of this contract. [grounds 2, 5]
- Shuttel shares your personal data with authorised service partners in the Shuttel distribution network. [grounds 1, 2 or 5]
- Shuttel may be legally obliged or authorised to provide personal data to third parties. [ground 3]
- If Shuttel suspects a violation of the rights of third parties, a criminal offence or abuse, it can provide personal data to third parties who have a legitimate interest in receiving it or to institutions serving the general interest. This may also include enforcement authorities such as the Public Prosecutor's Office or regulatory authorities. [grounds 3, 4 or 5]
- Shuttel may also share your data with other parties for the purposes of performance of a contract with you or on the basis of Shuttel's own legitimate business interests, such as the conduct of a central administration or customer service and the analysis of our services to you. [ground 5]
- Shuttel shares your personal data with parties assisting us in our services and which are not processors themselves (this would include accountants, legal advisors, consultants, etc.). [ground 5]
- for business-economic purposes (such as the sale of business activities or shares, or a company reorganization). [ground 5]

Shuttel also uses the services of third parties that act as processors, for example hosting services and research firms, with the objective of conducting market research, customer satisfaction surveys, etc. If these third parties are deemed to be processors within the definition of applicable data protection laws, Shuttel will make arrangements in writing with these third parties. These service providers will only process personal data in accordance with the instructions and under the control of Shuttel.

If personal data is sent to a recipient in another country, this will normally be required to be a country that offers a level of protection for personal data deemed appropriate by the European Commission. If personal data is to be sent to a recipient in a country that does not offer an appropriate level of protection, Shuttel will ensure that the legally required standards of protection are observed. If you wish to receive further information about the transfer of your personal data to countries outside the European Economic Area, you may contact Pon's Data Protection Officer (see article 12).

## 8. Retention of your data

We will retain personal data as long as necessary or permitted to do so within the framework of the purposes described in this privacy statement and in accordance with applicable law. The criteria used to determine the period of storage include:

- The duration of the period in which we have an ongoing relationship with you and provide the services to you (for example, as long as you have an account with us or continue to make use of our services).
- Whether there is a statutory obligation that we must meet (certain laws require, for example, that we retain our transaction records for a certain period of time before deleting them).
- Whether retaining the data is desirable in consideration of our legal position (i.e. in regard to statutory prescription periods, disputes, investigations by regulatory institutions, etc.).

## 9. Analysing website visits

When you visit or use our website(s), services, applications, communication services (such as e-mail) and resources, we may use cookies, web beacons and other similar data storage technologies with the goal of personalising advertisements and offering you a better, faster and safer customer experience. If you do not wish to accept cookies, you have the opportunity to indicate this. For more information about the use of cookies, please see our cookie statement ([www.shuttel.nl](http://www.shuttel.nl)). On our website(s) you may find links to other websites. We are not responsible for how these websites process your personal data. For this, please refer to the privacy statement of the website you are visiting.

We use the Leadinfo service from Rotterdam to measure the business use of our website. This service shows us company names and addresses based on the IP addresses of our visitors. The IP address is not included here.

## 10. Your rights, including the right of objection

You are entitled to know what personal data pertaining to you we process and to whom we have provided your personal data. You also have the right to obtain information about the business public transport chip card issued to you. If you have granted your consent to the processing of your personal data, you also have the right to revoke this consent.

If you wish to access, correct, update, restrict or delete the personal data pertaining to you that we process, wish to object to the processing of personal data or direct marketing, or if you would like to receive an electronic copy of your personal data for the purposes of providing it to another company (insofar as this right to transfer is granted to you under applicable law), contact our customer service department. The contact information is provided under article 12. In your request, please be as specific as possible as to the personal data to which your request pertains. We will respond to your request as quickly as is reasonably possible, and in any event within the period required by law. Finally, you also have the right to lodge a complaint with the Dutch Data Protection Authority.

You can only exercise your rights to the extent that they are granted to you by law. To make sure that the request was submitted by you, we may ask you to include a copy of a valid form of identification with your request. We will only do this if we deem it necessary for the purposes of identifying you, and if we do this we will also ask you to obscure your passport photo, MRZ (machine-readable zone, i.e. the number strip at the bottom of your passport identification page), passport number and citizen service number (BSN). We will destroy the copy of your identification immediately after we have identified you.

## 11. Security and protection of data

Shuttel takes appropriate security measures to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised alteration to the maximum possible extent. Shuttel has implemented technical and organisational measures in order to secure your personal data, including the use of encryption technologies. These security measures are periodically reviewed on the basis of threats.

## 12. Contact

Shuttel has its registered office at Zuiderinslag 2, NL-3833 BP in Leusden and its principal place of business at Stationsplein 1 E, NL-3818 LE in Amersfoort. If you have any questions and/or comments about this privacy statement, please contact:

Shuttel B.V.  
Attn. Customer Services  
Stationsplein 1 E  
NL-3818 LE Amersfoort  
Tel. +31 33 303 4600  
[advies@shuttel.nl](mailto:advies@shuttel.nl)

Our Data Protection Officer can be reached by e-mail via [privacy@pon.com](mailto:privacy@pon.com) and by post on the above address (attn. Privacy Officer).

## 13. Changes

We may change the way in which we process personal data and the composition and quantity of data we process. We therefore reserve the right to update this privacy statement. Any relevant changes will be notified to you. This Privacy Statement always shows the most recent revision date.

This statement was last revised on 16 December 2019.

The Dutch text of this Privacy Statement is the only authentic text. In the event of differences between the Dutch text and a translation into a foreign language, the Dutch text prevails.