



Privacy Policy for Rejsekort as an app

Valid from 2 April 2024

Version 1

Privacy Policy for Rejsekort as an app

At Rejsekort & Rejseplan A/S, we attach great importance to ensuring that you feel secure as a customer with us. Therefore, we process your personal data responsibly, with respect for your privacy and in accordance with all relevant legislation, including the General Data Protection Regulation (GDPR).

You can read more about our processing of your data and a description of your rights in this Privacy Policy.

Rejsekort as an app is a mobile application (in the following called 'app' or 'the app') developed by Rejsekort & Rejseplan A/S, in which you can purchase travel documents (valid tickets) for travel by bus, train, light rail and metro.

1. Contact details for data controller and Data Protection Officer

Rejsekort & Rejseplan A/S is the data controller for the processing of all personal data in Rejsekort as app. Our contact details are as follows:

Rejsekort & Rejseplan A/S
Automatikvej 1
DK-2860 Søborg
CVR no.: 27 33 20 72

Rejsekort Customer Services Tel.: +45 70 11 33 33

Via contact form at <https://www.rejsekort.dk/Kundecenter-privat/Kontaktformular>

By letter to Rejsekort Customer Services at the address:
Rejsekort Kundecenter Postboks 736
DK-2500 Valby

Contact details for our Data Protection Officer (DPO) are:

DPO@rejsekort.dk
Tel.: +45 70 20 40 08

Telephone hours are weekdays between 10:00 and 15:00.

2. Types of data we collect and purpose of the processing

2.1. Data related to your use of Rejsekort as an app

We register the data you provide in connection with your creation as a user of Rejsekort as an app and when you use the app.

The data that we process are:

- Mobile phone number
- Ticket settings, including customer type and any discount level
- Email address

- First name and surname
- Date of birth
- Postcode of home address
- IP address and device ID
- A system-generated unique user ID
- Fraud score
- Data about the mobile device used:
 - Brand and model
 - Operating system
 - Wi-Fi and Bluetooth signals
 - Battery status
- Data about your concluded journeys, including activity and location data
- Data about your payments, including completed and outstanding payments
- Data about registered means of payment
- Usage data:
 - Data may be collected about how you interact with the services, such as date and time of access, app features or pages accessed, app crashes and other system activity as well as browser type. However, these data are not personally identifiable.

We store your personal data to enable us to manage your customer relationship and service you as a customer.

If you contact Rejsekort Customer Services, we will also store the personal data you provide in this connection that are of relevance to your customer relationship.

If you contact Rejsekort Customer Services by telephone, your calls may be recorded if you grant specific consent to this. The recordings are used for documentation and training purposes and are erased after 30 days on an ongoing basis.

2.2. Data about your journeys and your location

Rejsekort as an app works by your travel activity being registered (travel data) when you use the app. We register GPS tracking and activity data (based on the movement sensor, if enabled, of your mobile device). We will only register the data about you, including your location, from when you open Rejsekort as an app, during your journey and until shortly after you have checked out. We only register the relevant data needed after check out to precisely determine the check out location. This process might take longer in areas with bad mobile reception than in areas with good mobile reception. These data are used to track your journey and calculate the price of your electronic tickets and correct payment for them.

Data about your journeys and location are necessary for you to be able to use the app. The purpose of the registration is consequently to enable us to serve you as a customer. Your travel history is also processed to comply with the requirements of the Danish Bookkeeping Act (*bogføringsloven*).

We also register data about your journeys for the purpose of detecting and preventing fraudulent behaviour.

The transport companies also use the data about your journeys for traffic planning purposes, however, only in anonymised or pseudonymised form.

We also use data about your journeys to ensure correct distribution of revenue between the transport companies.

2.3. Information about any profile blocking

In certain circumstances, we may block a customer's profile in case of fraudulent-like behaviour. Read more about the rules for blocking in the terms and conditions for Rejsekort as an app.

3. Profiling

In the app, we use profiling to detect and prevent fraudulent use of Rejsekort as an app.

The profiling is done by the app identifying when there is fraudulent-like behaviour on the concluded journeys. The system attaches a point value to all journeys made to detect whether the travel pattern shows signs of fraudulent use. On this basis, a total point score (fraud score) is generated for all customers, depending on their travel behaviour. If a customer's total fraud score becomes sufficiently high, this will be entered in the system, after which specific manual case handling will be done for the individual case.

Rejsekort as an app does not make use of automated decisions. Fraudulent behaviour will thus always be sanctioned based on manual specific case handling. In addition, it will mainly require that the customer receive one or more advance warnings about the behaviour shown.

The profiling that Rejsekort as an app performs thus never stands alone and will never in itself form the basis of sanctioning.

4. Who has access to personal data?

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

This includes employees in:

- Transport companies. Employees of the affiliated transport companies have access to the data necessary to be able to service and administrate you as a customer. This includes your travel and payment history as well as data about you, including your name, date of birth, contact details etc.
- IT suppliers. Our IT suppliers act as data processors and have therefore signed a data processing agreement, under which they are obliged to comply with the data protection rules, and they only process your data in accordance with our instructions on this. Our IT suppliers provide Rejsekort as an app and associated systems, among other services, and are responsible for the operation thereof. In addition, we use IT suppliers for sending emails, text messages and regular letters.
- Analysis institutes. We provide relevant data about you, such as your name, address, telephone number, email address and case number to analysis institutes for the purpose of conducting customer satisfaction surveys for us. It is voluntary whether you wish to participate in a satisfaction survey. The analysis institutes are obliged to erase any personal data they have received once the assignment has been completed.

4.1. Disclosure of personal data

If relevant, we disclose your personal data to the affiliated transport companies, for their independent processing of inspection fees, collection cases, customer complaints, travel time guarantee cases, financial cases, preparation of traffic analyses and service notifications.

We also disclose your personal data to public authorities, if relevant, for example the Danish Civil Aviation and Railway Authority, which, among other tasks, performs a revenue distribution for certain types of income in public transport.

In certain situations, we also disclose personal data for use in research projects. We will only disclose personal data if we specifically assess that such disclosure is lawful, that the disclosure serves a reasoned and legitimate purpose and that it is ethically justifiable. We also ensure that the disclosed data are secured to the greatest possible extent, including through pseudonymisation, if full anonymisation of the data is not possible.

5. How and for how long do we store data about you?

We store your personal data in IT systems that are subject to controlled and restricted access, and on servers located in specially secured premises. We also secure your personal data with appropriate technical and organisational safeguards from registration and until erasure. We ensure that your personal data are erased as soon as we no longer need them to meet the purpose for which the data were collected.

We store data about you as a customer for as long as necessary for the purposes mentioned under section 2, see the table below:

Type of personal data	Storage period
Master data (name, contact details etc.)	Five years after the end of the year in which the customer relationship ended (or customer relationship without activity)
Data about selected customer type, price and balance.	Five years from the end of the year which the transaction concerns.
Information about your travel data, including GPS and activity data, (for example check in Ballerup on 21 October 2024 at 12:03, check out at Østerport on 21 October 2024 at 12:30)	We store travel data for three years from the date of their registration. The travel data are then stored in anonymised form for analysis purposes.
Case data registered in connection with enquiries to Rejsekort Customer Services	Three years from registration of the data.
Recordings of telephone calls in Rejsekort Customer Services	30 days from the recording date.
Data about your mobile device, brand and model, operating system etc.	Three years from registration of the data.

On specific objective grounds, deviation from these erasure deadlines will be possible, on the basis of a specific assessment, so that the personal data are erased at an earlier or later time.

Transfer of data to third countries

We only store data on servers located within the EU. However, we have suppliers based outside the EU, in Switzerland and the USA, respectively. The supplier in the USA is affiliated to the EU-U.S. Data Privacy Framework and consequently falls under the EU Commission's adequacy decision of July 2023. Switzerland is also on the European Commission's list of secure third countries.

6. Lawfulness of processing

We process your personal data based on the following lawfulness of processing:

- When necessary for the performance of a contract with you (Article 6(1)(b) of the GDPR). This lawfulness of processing applies to the ongoing customer relationship under which you have been created as a customer in the app.
- Where processing is necessary for our compliance with a legal obligation (Article 6(1)(c) of the GDPR). This lawfulness of processing applies as we are obliged to store data about, for example, financial transactions pursuant to the Danish Bookkeeping Act.
- When you have granted your consent to the processing (Article 6(1)(a) of the GDPR). This lawfulness of processing applies to telephone recordings in connection with customer enquiries to Rejsekort Customer Services.
- When necessary for us to be able to pursue a legitimate interest (Article 6(1)(f) of the GDPR). This lawfulness of processing applies to our processing of data for use for:
 - identification and prevention of fraudulent behaviour, see section 3. The lawfulness of processing is identification, prevention and handling of fraudulent behaviour in the app. Our assessment that the purpose is legitimate and that the processing is proportional to achievement of the purpose.
 - Disclosure of data, see section 4.1. The legitimate interest in disclosure of the data is to support the legitimate and lawful purposes secured by the data recipients' processing.

7. Your rights

Under the General Data Protection Regulation, you have a number of rights concerning our processing of your personal data: If you wish to exercise your rights, you must contact us. Please see our contact details above under section 1.

You have the following rights:

Right to see data (right of access)

You have the right to access the data that we process about you as well as various additional data.

Right to rectification (correction)

You have the right to have inaccurate data about you rectified. You also have the right to have your data supplemented with additional data if this will make your personal data more complete and/or up to date. You may do this yourself directly in the app.

Right to erasure

In special cases, you have the right to have data about you erased before the date of our ordinary general erasure of data.

Right to restriction of processing

In certain cases, you have the right to obtain restriction of the processing of your personal data. If you have the right to obtain restriction of processing, this means that, in future, we may only process data – apart from

storage – with your consent, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person or for reasons of important public interest.

Right to object

In certain cases, you have the right to object to our otherwise lawful processing of your personal data. This only applies, however, if our processing is based on Article 6(1)(f) (legitimate interest) of the GDPR. As stated in this Privacy Policy, this concerns the data that we process for the purpose of identification and prevention of abuse. This means that we may then no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms or if the processing is necessary for the establishment, exercise or defence of legal claims.

Withdrawal of consent

You have the right to withdraw your consent at any time after you have granted it. You can do this by contacting Rejsekort Customer Services using the contact details stated above in section 1. If you choose to withdraw your consent, this will not affect the lawfulness of the processing performed before you withdrew your consent.

If you withdraw your consent, this means that we will in principle restrict the processing of your personal data by erasing or anonymising the personal data processed in accordance with your consent. As stated above in section 2.1, this concerns recordings of telephone calls if you contact Rejsekort Customer Services by telephone.

Right to transmit data (right to data portability)

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

Right to complaint to the Danish Data Protection Agency

You can complain to the Danish Data Protection Agency about our processing of your personal data.

The contact details for the Danish Data Protection Agency are as follows:

Datatilsynet
Carl Jacobsens Vej 35.
DK-2500 Valby
Tel.: +45 33 19 32 00
Email: dt@datatilsynet.dk
www.datatilsynet.dk

8. Amendments to this Privacy Policy

We regularly review this Privacy Policy to keep it up to date and in accordance with the way Rejsekort as an app functions as well as with applicable principles and legislation. The Privacy Policy may be amended without notice.

At the top of this Privacy Policy, you can always see when the policy was last updated and/or amended. Significant amendments to the Privacy Policy will be posted on our website www.rejsekort.dk together with an updated version of the Privacy Policy.