

# **Privacy policy for Rejsekort as an app Valid from 20 August 2024**

**Version 3**

## **Privacy policy for Rejsekort as an app**

At Rejsekort & Rejseplan A/S, it is important to us that you feel comfortable being our customer. 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.

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 (hereinafter referred to as "app" or "the app") developed by Rejsekort & Rejseplan A/S, in which you can purchase a valid ticket (travel document) for public transport from transport companies affiliated with Rejsekort & Rejseplan A/S. For information about the affiliated transport companies, see section 3 in Terms and conditions for Rejsekort as an app.

## 1. Contact details of the data controller and data protection officer

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

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

Rejsekort Customer Centre Phone: 70 11 33 33 33

Via contact form at [https://www.rejsekort.dk/rejsekort\\_app/Kontaktformular](https://www.rejsekort.dk/rejsekort_app/Kontaktformular)

By letter to:  
Rejsekort Customer Centre PO Box 736  
2500 Valby, Denmark

Contact details for our Data Protection Officer (DPO) are  
[DPO@rejsekort.dk](mailto:DPO@rejsekort.dk)  
Phone: 70 20 40 08

Phone hours are weekdays between 10-15.

## 2. What data do we collect and what is the purpose of the processing

### 2.1. Information about your journey, location and activity in connection with your use of Rejsekort as an app

We process the information you provide when you register as a user of Rejsekort as an app. We also process a number of data that is created through your use of the app.

The information that you need to provide when creating a profile is:

- Your mobile phone number
- Your email address
- Your first and last name
- Your date of birth
- Information about the associated payment method
- A system-generated unique user ID is also created and linked to your profile

Once you have created your profile and use the app to purchase public transport tickets, we register the necessary location (GPS) and activity information from your mobile phone to provide the Rejsekort as an app service. We register your location as soon as you open the app, but this is done locally on your phone for 5 minutes at a time, after which the registration is overwritten with new data. This is done to find the nearest station or stop, which becomes the start location for your check in. If you open and close the app without checking in, the registered location information prior to check-in will not be saved on your phone and we do not collect this data. If you open the app and check in, we only collect location data for the last 2 minutes prior to check-in to verify that the stop identified by the system is the correct one.

When you check in, the time and place of check-in is recorded, and the app then tracks your location and activity until you are checked out again. When you check out, we register the location that represents the end of the journey. This is done to provide you with a valid ticket for the entire journey by generating the correct ticket corresponding to your travel route and means of transport used and to calculate the correct price for it. Once you have checked out and the system has calculated your journey, we no longer register your location or activity. Rejsekort as an app only collects data when the app searches for a station or stop when you are actively travelling and until you check out yourself or use Smart check out, and are thereby automatically checked out of the app.

In other words, we do not register and collect data on your phone or in the travel card system when your app is closed, and we only register information locally on your phone that will not be saved if the app is closed without check-in.

The app only has access to data that is necessary to provide you with a valid public transport ticket from the affiliated transport companies and only when you open the app and between check-in and check-out - even if you have to select 'Always allow' for location sharing on iPhone.

In order for the app to function properly and to ensure that we can serve you if you experience problems with the app, we also process certain technical data. This concerns:

- Your IP address and device ID
- Your ticket settings, including customer type and any discount level
- Information about the mobile device used:
  - Make and model
  - Operating system
  - Wi-fi and Bluetooth signals
  - Battery status

As you are entitled to access your purchase history for 36 months, we will store your travel history and purchase history in the app for this period. This is done so that you can continuously ensure that the app has calculated your journeys correctly. It is also done so that the Rejsekort Customer Centre can help you if, for example, you have found an error in your journey. Your travel history contains information about your completed journeys, including location information up to 5 minutes after the final destination, and your purchase history contains information about your completed payments.

We also process your location and activity data for the purpose of detecting and preventing misuse. Read more about our processing to detect and prevent abuse in section 3 below.

We also use the information in pseudonymous form to train the system's algorithms to calculate your journey more accurately, to identify and make system fixes in case of errors and to develop new features to improve the usability of the app.

If you contact Rejsekort Customer Centre, we will also store the personal data you provide in this connection that is relevant to your customer relationship.

When contacting the Travel Card Customer Centre by phone, your calls may be recorded if you give your specific consent. The recordings are used for documentation and training purposes and are continuously deleted after 30 days.

We also collect data about how you interact with the app, such as date and time of access, app features or pages accessed, app crashes and other system activity, and browser type. However, we only process this data in anonymised form.

## 2.2 Information about your location and activity *after* travelling by public transport

Rejsekort as an app works by recording your travel activity (travel data) when you use the app. Specifically, we record location and activity data from your mobile device.

We only register your location information from the time you open Rejsekort as an app, during your journey while you are checked in and until you are checked out and your journey is calculated. However, we do not record information about you when you are not using the app and have it running in the background on your phone and are not checked in, as described in section 2.1. After you have checked out, we will stop recording your location information again as soon as possible when the system is able to determine exactly where the check-out was made. In areas with poor mobile connectivity this may take longer than in areas with good mobile connectivity.

If you do not check out immediately after the end of your journey, we will continue to register your location and activity information until you check out. We do this because you have a valid travel authorisation as long as you are checked in. At some point when you check out, your journey will be calculated and the most likely place your journey actually ended will be the final destination on your ticket.

We process the location data relating to the time after you actually completed the journey by public transport until check-out is made, to ensure:

- 1) Proper functioning of the system, including fixing system errors and system improvement
- 2) that you have not misused our solution, and
- 3) that we serve you in the best way possible at the Rejsekort Customer Centre

For no. 1, we store and process the personal data in pseudonymous form, i.e. where the personal data is masked and cannot be directly attributed to you without additional information.

For no. 2 and 3, we need to process and store the personal data in directly personally identifiable form, as we need to know the identity of the individual customer in order to process it, e.g. to correct your travel information where a final destination has been (stated) incorrectly calculated.

The location and activity data collected from 5 minutes after disembarking from the last means of public transport and until check-out is performed either manually, via smart check-out or automatic check-out, is stored in pseudonymised form in the travel card system for 2 months for the purpose of system improvements and correction of system errors, after which it is deleted. Similarly, the same data is stored in directly personally identifiable form for 2 months to prevent cheating with the application. For technical reasons, this data is then stored for a further 2 months in backup. Location and activity data from the time between final destination and check-out will, however, only be displayed for customer service purposes, including the correction of any errors in journeys. Similarly, location and activity data relating to the period in transit between two means of transport with more than 30 minutes between the two means of transport is stored and deleted. In these cases, location and activity data is deleted from 5 minutes after the first means of transport until 5 minutes before the next means of transport after 2 months or 30 days. This means that only your public transport journey itself is stored for 36 months.

## 2.3 Information about any profile blocking

Under certain circumstances, we may block your profile in the event of abusive behavior. Read more about the rules for blocking in the Terms and Conditions for Rejsekort as an app, which you can find directly in the app and at [www.rejsekort.dk](http://www.rejsekort.dk) under "the small print".

## 3. Profiling

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

Profiling is conducted by the app identifying misuse-like behavior during completed journeys. This occurs within the system, where each journey is automatically checked for signs of misuse-like behavior. The system assigns a score to all completed journeys based on whether the travel pattern indicates potential misuse. Previous behavior and scores are not considered in this calculation. Based on this, an overall point tally (a "fraud score") is generated for all customers, depending on their travel behavior. If a customer's overall fraud score becomes sufficiently high, it will be flagged in the system, after which a specific manual case review will take place. During the review of the overall point tally, previous behavior and scores will be taken into consideration.

Misuse-like behavior may result in sanctions, such as being blocked from using the app, based on a manual case review. Generally, sanctions will require that you have received one or more warnings related to the observed behavior beforehand. In the Rejsekort as an app, profiling thus serves as decision support for caseworkers, and no automated decisions are made.

#### **4. Who has access to personal data?**

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

This includes employees in:

- Traffic companies. The employees of the connected transport companies have access to information that is necessary to serve and manage your customer relationship. This includes your travel and payment history as well as information about you, including name, date of birth, contact details etc.
- IT suppliers. Our IT suppliers act as data processors and have therefore signed a data processing agreement, which obliges them to comply with data protection rules and only process your data in accordance with our instructions. Our IT suppliers provide, among other things, Rejsekort as an app and associated systems and are responsible for their operation. In addition, we also use IT suppliers to send emails, text messages and physical letters.

Analysis institutes. We provide relevant information about you, such as name, address, telephone number, e-mail address and case number, to research organisations for the purpose of conducting customer satisfaction surveys for us. It is voluntary whether you wish to participate in a satisfaction survey. The research institutes are obliged to delete the personal data received once the task has been completed.

##### **4.1 Disclosure of personal data**

If applicable, we will disclose your personal data, including travel history, journey price and number (not GPS points), *in pseudonymous form* to the affiliated transport companies in connection with revenue sharing and settlement with them and for their independent processing of financial matters, cf. the Act on Transport Companies.

If relevant, we will disclose your personal data in directly personally identifiable form to the affiliated transport operators in connection with their independent processing of control fee cases, collection cases, customer complaints, travel time guarantee cases and financial cases. It is assessed that we can lawfully disclose the necessary personal data to the affiliated transport companies on the basis of Article 6(1)(f) of the General Data Protection Regulation, as RKR and the transport companies in question thereby pursue a legitimate

interest in protecting and collecting their claims under the agreements with the customers, and as the customers' interests do not override this.

Similarly, and only if relevant, we will disclose your personal data to public authorities, e.g. to the Danish Transport Authority, which, among other things, performs revenue sharing for certain revenues in public transport.

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

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

We store your personal data in IT systems with controlled and restricted access and on servers located in specially secured premises. We also secure your personal data with appropriate technical and organisational security measures from the time of registration until deletion. We delete your personal data as soon as we no longer need it to fulfil the purpose for which it was collected.

We store information about you as a customer for as long as it is necessary for the purposes mentioned in section 2, cf. the table below:

Type of personal data	Storage time	Legal basis
Master data (name, age, etc.)	For as long as you are our customer and until 5 years after the end of the year in which the customer relationship has ended (or customer relationship without activity)	As long as you are our customer, GDPR art. 6(1)(b). Then section 12 of the Danish Bookkeeping Act.
Contact details (email and phone number)	For as long as you are our customer and until 3 years after your last trip	As long as you are our customer, GDPR art. 6(1)(b). After the end of the customer relationship in accordance with GDPR article 6(1)(f), as we assess that we have a legitimate interest in being able to document this information in connection with any claim you may make against us up to the limitation period of 3 years, cf. § 3 of the Limitation Act.
Information selected customer type, price and balance.	5 years from the end of the year to which the transaction relates.	Section 12 of the Bookkeeping Act
Information about your travel data, including location (GPS) and activity data (e.g. check-in 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 3 years from the time the data is registered. After that, travel data is stored in anonymised form for analysis 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 claim you may make against us up to the limitation period of 3 years, cf. section 3 of the Danish Limitation Act
	Location and activity data collected during a second journey between two means of transport (public transport) exceeding 30 minutes is deleted after 2 months	GDPR Art. 6(1)(f), as we consider that we have a legitimate and objective interest in detecting and preventing fraud with the app as well as making system

	for data beyond 5 minutes after the final destination for the first means of transport and up to 5 minutes before the start of the journey for the next means of transport. After that, this data is deleted in the system and stored for another 2 months in backup for technical reasons. Other journey data related to public transport is stored as stated above for 3 years.	improvements and fixing system errors for the benefit of all public transport travellers.
Location and activity data related to the period from final destination to check-out (i.e. not related to travelling by public transport)	2 months after your journey, we store your location and activity data for the period after the end of your journey and until check-out for the purpose of 1) detecting and preventing misuse of Rejsekort as an app and for the purpose of (in directly personally identifiable form) and 2) system improvements and correction of system errors (in pseudonymous form). After this, the data is deleted in the system and stored for technical reasons for a further 2 months in back-up.	GDPR Art. 6(1)(f), as we consider that we have a legitimate and objective interest in detecting and preventing fraud with the app as well as making system improvements and fixing system errors for the benefit of all public transport travellers.
	30 days after your trip, we store your location and activity data for the period from the end of your trip until check-out for customer service purposes.	GDPR Art. 6(1)(f), as we consider that we have a legitimate and objective interest in being able to correct any incorrectly calculated journey you may have made, so that you pay in accordance with the journey actually made.
Case information registered when contacting the Rejsekort Customer Centre	3 years from the registration of the data.	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 claim you may make against us up to the limitation period of 3 years, cf. § 3 of the Danish Limitation Act.
Recordings of phone conversations in the Rejsekort Customer Centre	30 days from the time of recording.	Your consent, cf. GDPR Art. 6, para. 1 lit. a
Information about your mobile device, make and model, operating system, etc.	3 years from the registration of the data.	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 claim you may make against us up to the limitation period of 3 years, cf. § 3 of the Danish Limitation Act.

These deletion deadlines may, after a specific assessment, be deviated from so that the personal data is deleted at an earlier or later date if there are specific, objective reasons for this. This may be the case, for example, if you request deletion without ever having used the app to buy a ticket. In such a case, deletion of your data may take place earlier than the time specified in the form. If, on the other hand, a case is pending before the courts, the specified retention periods may be extended after a specific assessment.

#### Transfer of data to 3rd countries

We only store data on servers located within the EU. However, we have suppliers based outside the EU, in Switzerland and the United States, respectively. The supplier in the US is affiliated with the EU-U.S. Data Privacy Framework, and is thus subject to the EU Commission's adequacy decision from July 2023. Switzerland is also on the EU Commission's list of secure third countries.

## **6. Legal basis for processing operations**

We process your personal data based on the following processing bases:

- When necessary to fulfil an agreement with you (Article 6(1)(b) of the GDPR). This processing basis applies in the ongoing customer relationship where you are registered as a customer in the app.
- When it is necessary for us to fulfil a legal obligation (Article 6(1)(c) of the General Data Protection Regulation). This basis for processing applies as we are obliged to retain information about, among other things, financial transactions pursuant to section 12 of the Bookkeeping Act.
- When you have given your consent to the processing (Article 6(1)(a) of the General Data Protection Regulation). This processing basis applies to telephone recordings in connection with customer enquiries to the Rejsekort Customer Centre.
- When it is necessary for us to fulfil a legitimate interest (Article 6(1)(f) of the General Data Protection Regulation). This basis for processing applies to our processing of data for the purposes of:
  - The legitimate interest of the processing is the identification, prevention and management of misuse in the app. It is our assessment that the purpose is legitimate and that the processing is proportionate to achieve the purpose.
  - Processing of the location data that the app collects and that are not related to your journey by public transport. This applies to the location data that are collected if, for a period, you fail to check out after your journey is finished. This processing is done to ensure customer service, data verification, analyse whether the itinerary calculation in the solution works correctly, and to prevent and manage fraud, and it is our assessment that these purposes are legitimate and that the processing is proportionate to achieving the purposes.
  - When we send you push notifications that you have probably forgotten to check out at the end of your journey. We send these notifications to ensure data minimisation and it is our assessment that the purpose is legitimate and that the processing is proportionate to achieve the purpose.
  - The legitimate interest in disclosure is to support the legitimate and lawful purposes served by the recipients of the data processing.

## **7. Your rights**

You have a number of rights under the General Data Protection Regulation in relation to our processing of your personal data. If you want to exercise your rights, please contact us. See our contact details above under point 1.



Your rights are:

*Right to see information (right of access)*

You have the right to access the data we process about you, as well as a range of additional information.

*Right to rectification (correction)*

You have the right to have inaccurate information about yourself corrected. You also have the right to have your data supplemented with additional information if it will make your personal data more complete and/or up-to-date. You have the option to 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 time of our regular general erasure occurs.

*Right to restriction of processing*

In certain cases, you have the right to have the processing of your personal data restricted. If you have the right to have the processing restricted, we may in future only process the data - except for storage - with your consent, or for the establishment, exercise or defence of legal claims, or to protect a person or important public interests.

*Right to object*

In certain cases, you have the right to object to our otherwise lawful processing of your personal data. This only applies if our processing is based on Article 6(1)(f) (legitimate interest) of the General Data Protection Regulation. As stated in this Privacy Policy, this relates to the data we process for the purposes of identification and prevention of misuse. We may then no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or 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 if you have given it. You can do this by contacting the Rejsekort Customer Centre at the contact details stated above in section 1. If you choose to withdraw your consent, this will not affect the legality of the processing carried out before you withdrew your consent.

If you withdraw your consent, this means that we generally restrict the processing of your personal data by deleting or anonymising the personal data processed in accordance with the consent. As stated above in section 2.1, this concerns recordings of telephone conversations when contacting the Rejsekort Customer Centre by telephone.

*Right to transmit data (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 this personal data transferred to another data controller without hindrance.

## **Right to complain to the Danish Data Protection Agency**

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

The Danish Data Protection Agency has the following contact details:

Danish Data Protection Agency  
Carl Jacobsens Vej 35.  
2500 Valby, Denmark  
Phone: +45 33 19 32 32 00  
Mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)  
[www.datatilsynet.dk](http://www.datatilsynet.dk)



## **8. changes to this privacy policy**

We regularly review this privacy policy to keep it updated and in line with the way Rejsekort as an app works as well as applicable principles and legislation. The privacy policy is subject to change without notice.

You can always see at the top of this Privacy Policy when the policy was last updated or changed.

Significant changes to the Privacy Policy will be published on our website [www.rejsekort.dk](http://www.rejsekort.dk) together with an updated version of the Privacy Policy.