At Translink, we want all passengers to be able to move freely and choose the way in which they travel themselves. We can help you to fulfil this need, but sometimes we need to know something about you. We believe that privacy is all about freedom and the ability to decide yourself how your personal data is used and who by.

In this privacy statement, we have set out how we handle your personal data for you. You can read here which of your details we process and what influence you can exert over this. This privacy statement is made up of various sections.

1. What is personal data?
As soon as data can be related directly or directly to a person, it is referred to as personal data. Examples of personal data are your name, (email) address, date of birth and bank account number. Your OV-chipkaart number or username can also be considered personal data.

2. Why does Translink process personal data?
Translink processes data in order to provide the following services:

- Production, distribution, termination and replacement of the OV-chipkaart.
- Responding to requests through OV-chipkaart Customer Services, such as blocking a personal OV-chipkaart after loss or theft.
- Offering the possibility to use the public-transport travel history, for example, through My OV-chip.
- Loading credit and managing the credit that is loaded onto the OV-chipkaart.
- Processing transactions, such as checking in and out.
- Returning your remaining credit to your last known bank account after your OV-chipkaart has expired.
- Storage, for a maximum of 5 years after expiry of an OV-chipkaart, of the minimum data set after you have requested a refund of your remaining credit, in order to be able to demonstrate that we have paid out the remaining credit on an expired OV-chipkaart.

We do this on the basis of performance of a contract.

N.B.: Translink does not process any more personal data than necessary. Translink does not process your data for marketing purposes and will not send you any offers of products or services.

Translink also processes data for:

- Fraud management, including prevention, detection and measures to combat fraud. We do this on the basis of our legitimate interest as a company.
- Statistical purposes, comprising personal data being aggregated so these can’t be related to a natural person anymore. We do this on the basis of compatible purposes for statistical purposes.

N.B.: If you would like to object to the use of your data for this purpose, please send an email to: privacy@ov-chipkaart.nl.

3. What do we use your data for?

OV-chipkaart-system
The OV-chipkaart-system consists of a system for payments and electronic travel rights such as the OV-chipkaart. A passenger can use these at the public transport companies, being Arriva, EBS, GVB, HTM, Keolis, NS, Qbuzz, RET and Transdev. You can use it as well with Blue Amigo. The core processes of the OV-chipkaart-system are the acquiring of the OV-chipkaart; balance and products;
travelling; and services. Because the core processes are intrinsically linked to each other, Translink and the public transport companies qualify as joint controllers for the total of the processes. Regarding the individual processes in relation to the core processes, every company is a controller on its own.

Translink and the public transport companies have determined their responsibilities by means of an Arrangement which comprises amongst others which personal data to be used, storage limitations, a procedure data breaches and how to align the accommodation of exercising rights by data subjects.

**Personal OV-chipkaart**
A personal OV-chipkaart is registered in your name. This means that, when you apply for this card, you need to enter several personal details. Translink is the Controller for the data that you have provided to Translink directly. This could be via the [www.ov-chipkaart.nl](http://www.ov-chipkaart.nl) website, telephone and via an application form. For a personal OV-chipkaart, the following data is stored in the Translink systems. Not all this data is found on your card.

- Name
- Address, postcode and town or city
- Passport photo
- Gender (optional)
- Telephone number
- Date of birth
- Bank account number
- OV-chipkaart card number (16 digits)
- Username (if you apply for My OV-chip at [www.ov-chipkaart.nl](http://www.ov-chipkaart.nl))
- Email address

**Card details**
A personal OV-chipkaart includes a passport photo and your name. A date of birth can also be found on personal cards issued before 1 January 2020 and personal cards supplied before 1 January 2017 include the gender. The following information is also stored on the chip in the card:

- Chip number (internal number)
- Credit
- The last ten travel transactions and last two loading transactions
- Automatic reloading amount (if applicable)
- Travel products (if applicable)
- Date of birth (only for a personal OV-chipkaart, for automatic calculation of age discount

**Anonymous OV-chipkaart**
This card is anonymous. Your personal data is not known to us. An anonymous OV-chipkaart cannot be purchased directly from Translink by a consumer. Translink does not know who is buying an anonymous card and does not know who is using the anonymous card to travel. The card can be used by more than one person (although not at the same time).

If you are using an anonymous OV-chipkaart, you can pay and travel on public transport without your identity being known. You can also consult your public transport travel history and view the credit on your card anonymously at [www.ov-chipkaart.nl](http://www.ov-chipkaart.nl).

For a number of service processes, it is necessary to temporarily record data for an anonymous card as well. This includes:

- Requesting a credit refund for an (expired) card: the OV-chipkaart number and the bank account number to which the credit can be returned are required for this process. If you request a credit refund using a form, we will additionally record in our systems how much we have paid you.
- After payment of the credit on an expired card at your request, we hold this data for a maximum of 5 years to demonstrate that we have paid out the remaining credit.
- Customer Services: customer contact with anonymous cardholders is registered by the telephonic Customer Services, without name and address details. Only the question about which you called is
registered. It may be that you need to be phoned back or emailed. In this case and for this specific purpose, your contact details will be temporarily recorded.

Transaction and location data
When you travel with the OV-chipkaart, the public transport company you travel with (acting as a service provider) is the Controller for the transaction and location data. Translink is a Controller for the validation of this data and the settlement of all transactions with the public transport companies. Translink and the public transport companies make this data available via the www.ov-chipkaart.nl website. If you have created an account for the www.ov-chipkaart.nl website and/or the OV-chipkaart app, you can view your transactions and location data there, among other data. You will find the contact details for the operators at www.ov-chipkaart.nl/vervoerders.

Processing of data on this website and My OV-chip
You can apply for My OV-chip on this website. You do this with a username and password. With an OV-chipkaart account, you will be able to view your journeys. You can also create a declaration overview, view your card details, change details and use a number of services.

This website uses analytical cookies in order to offer an optimal user experience, and we use functional cookies in order to save your preferences. For more information, please see our cookie statement.

Recording of telephone calls
Telephone calls are recorded for training and quality purposes when you phone us or when our Customer Services phone you. The recordings are stored for a period of 3 months. We do this on the basis of our legitimate interest as a company.

Anonymised processing of personal data
We process your personal data in an anonymised form for test purposes. We do this prior to developing new services and making improvements to existing services. Translink has a legitimate interest in doing this. We will of course ensure that this data is as difficult as possible to trace back to an individual. If, as a passenger, you do not wish for your data, anonymised as far as possible, to be used for this purpose, you can object to this. Please do this using our email address: privacy@ov-chipkaart.nl.

4. Information management

The public transport companies want to ensure that public transport is as efficient and effective as possible. They therefore have an interest in obtaining insight into passengers’ travel patterns via statistical research. This information is also interesting to third parties, such as government institutions with a remit involving (public) transport and working to improve the service provided to passengers.

The public transport companies concluded an Arrangement (‘Information management’) detailing amongst others which personal data is to be used, storage imitations and with whom these to be created insights can be shared. Translink has been engaged to collect, store, pseudonymise and aggregate the data. Without additional information the singling out of any person is no longer possible. Based on this data Translink and other parties - requested by the public transport companies – are able to create information products. The privacy statements of the public transport companies contain an extensive description of information management.

Central contact point
The public transport companies and Translink have set up a central contact point, which you can use for any questions about processing of your personal data for the creation of research databases and information products. You can contact Translink via privacy@ov-chipkaart.nl. You can also submit a request here in order to exercise your rights. If you do not want the public transport companies to use your transaction data for statistical research into travel patterns, you can let us know. State your card number in the email and indicate clearly that you object to the use of the transaction data linked to the
card provided for statistical purposes. For questions, requests or objections, please send an email to privacy@ov-chipkaart.nl.

5. Valys Travel Pass
The Valys Travel Pass allows you to travel both on public transport and using the Valys taxi. The Valys Travel Pass is a combined card intended for use by passengers who are entitled to travel with Valys but also wish to travel by public transport. When you apply for the Valys Travel Pass, two separate agreements are created. You enter into an agreement with Transvision B.V. for the Valys travel entitlement, so you can travel with Valys. You also enter into an agreement with Translink for the personal OV-chipkaart, so you can travel on public transport. When you apply for the Valys Travel Pass, Transvision will provide Translink with the following personal data relating to you:

- Valys pass number
- Name
- Address, postcode and town or city
- Gender (optional)
- Passport photo
- Date of birth
- Phone number
- Email address

The provision of this personal data to Transvision by Transvision is necessary to produce a Valys Travel Pass in the form of a personal OV-chipkaart. Translink is responsible for the production, issuing and function of the OV-chipkaart as well as processing of travel transactions. Translink is the data controller when this personal data is processed for the OV-chipkaart.

The provision of personal data by Transvision to Translink for the Valys Travel Pass takes place on the basis of the underlying implementation agreement. When you apply for the Valys Travel Pass, you accept the Transvision B.V. General Terms and Conditions and the OV-chipkaart General Terms and Conditions.

6. We protect your data
We handle your data carefully and process and secure it according to the requirements of the General Data Protection Regulation (GDPR). Translink carries out regular audits to guarantee passengers’ privacy.

7. Sharing of your data with third parties
What we do not do
Translink does not sell your data to third parties for marketing, sales and other business activities.

What we do
Translink appoints third parties to carry out certain services, such as for the processing of forms and for the management of systems. Insofar as these third parties have access to your data when performing the relevant services, Translink has taken the required contractual and organisational measures to ensure that your data is only processed for the above purposes.

In certain circumstances, Translink also provides your personal data to third parties who process personal data at the request and on behalf of Translink. Translink makes written agreements with these processors, to ensure that they guarantee confidentiality and only use your personal data to carry out the specific task they were given by Translink. These processors are not permitted to make independent use of your personal data or pass this on to third parties. This applies to providers of payment services, debt collection agencies, cloud and hosting companies, IT service providers, customer care, agencies that support Translink campaigns and research and consultancy firms.

Two organisations located outside the European Economic Area (EEA) process data on behalf of Translink. One is located in Surinam and one of our suppliers with ‘Binding Corporate Rules’ also
occasionally uses a subsidiary in India. Translink has made all agreements necessary with the organisations, in order to protect your data correctly in accordance with Article 46 of the GDPR. If you would like further information about the agreements that Translink has made with these organisations, please contact Translink using the email address privacy@ov-chipkaart.nl.

**Processing of your data for use of OV-chipkaart as a form of identification**

If a participant in the OV-chipkaart system, such as an operator, uses the OV-chipkaart as a form of identification, we will only provide your internal chip number if you give consent for this. An example of an additional service is a subscription for the OV-fiets (bicycle).

**Provision of data to competent authorities**

Translink is obliged to provide your data to third parties in some cases, on the basis of the law. Translink provides information to the police and judiciary in relation to missing persons, as Translink believes that this is in the public interest. Like all other companies in the Netherlands, Translink is also legally required to provide information in amongst others the case of criminal proceedings. We only provide this information in the event of a formal request and only if the request meets the regulations and laws.

### 8. Your rights on the basis of privacy legislation

The GDPR allows you to exercise the following rights in relation to personal data:

* Right of access
* Right to rectification
* Right to erasure of data
* Right to restrict processing
* Right to data portability
* Right to object

The right of access to your personal data allows you to ask us which of your personal data have been registered and for which purposes these data are used. There are various ways to do this. If you would like access to your travel history, your travel products and the personal data you have provided, such as your name and address, we refer you in the first instance to the My OV-chip environment on this website and the OV-chipkaart app.

If you cannot find the information you are looking for on our website or our app, or you would like to exercise one of the other rights (as listed above) you can submit a request by post or email to Customer Services. If you provide Customer Services with specific details (such as what you would like access to) Customer Services will be able to handle your request quicker and more efficiently. You can find the contact details for our Customers Services department at the end of this document.

In order to identify you, we will ask you to send the following information to Customer Services.

- Your name
- Your date of birth
- Your OV-chipkaart number (the external number you can find on your OV-chipkaart)
- A screenshot of your My OV-chip environment

If you do not have a My OV-chip environment (and therefore cannot provide a screenshot for identification), we will ask you to identify yourself by sending a copy of your passport or ID card, on which your Citizen Service Number (Burgerservicenummer - BSN), photograph and signature have been made illegible.

We may also ask you to provide identification in the form of a copy of your passport or ID card if you submit a non-specific request (for access) to Customer Services. You will receive a response to your request within four weeks of the request. If you would like to receive a response by post, please state your address clearly in the letter. After handling of the request, we will destroy the copy of your passport or ID card (if this was provided).
Correction of your data
You are entitled to have your personal data corrected if this is not accurate. To do this, you can contact Customer Services via privacy@ov-chipkaart.nl. You will receive an answer within four weeks. If we need more time you will be informed about this in due time.

Objection to processing of your personal data by Translink
You can object to processing of your personal data by Translink if your personal data is used for purposes other than those necessary to perform an agreement or necessary to meet a legal requirement. You can for example object to use of your personal data for analytical, statistical and academic research purposes. To do this, you can contact Customer Services via privacy@ov-chipkaart.nl.

Right to be forgotten
In some cases, you have a right to deletion of your personal data. This right means that, in a number of cases, Translink must delete personal data if you request this. E.g. if you previously gave (express) permission to Translink for the use of your data, but you are now withdrawing this permission. Translink will then delete this data.

Right to data portability
You have the right to receive the personal data that Translink holds of you. So, you can easily pass this data on to another organisation that provides the same type of service. You can also ask Translink to transfer the data to another organisation directly.

9. How long is your data stored for?
Translink stores data relating to transactions that you make using your OV-chipkaart for a maximum of 18 months. After this period, transactions, such as check-in and check-out data, can no longer be viewed in the public-transport travel history. OV-chipkaart Customer Services are also unable to answer questions relating to transactions more than 18 months old.

If your card expires or is terminated, the data linked to this card, such as the passport photo and other personal data, will be removed from Translink’s systems within three months. The transactions will be deleted 18 months after termination of the card.

10. Complaints Procedure
You can submit complaints to Customer Services at any time. If you are not satisfied with the handling of your complaint, you can appeal to the Public Transport Disputes Commission: Postbus 90600, 2509 LP, The Hague. You also have the right to submit your complaint directly to the Dutch Data Protection Authority: Postbus 93374, 2509 AJ, The Hague.

11. Contact
If you have further questions after reading this privacy statement, please contact us at privacy@ov-chipkaart.nl. We will be happy to help you! The Data Protection Officer at Translink is Ms A. Beugeling. She works with a privacy team to ensure that the privacy regulations are observed correctly. You can contact her using the following details:

- email: FG@translink.nl
- telephone: +31 33 467 20 00
- Trans Link Systems B.V. attn. data protection officer
  Postbus 1808
  NL - 3800 BV AMERSFOORT

Other Translink privacy statements
Privacy Statement www.uitcheckgemist.nl
Privacy Statement www.ovpay.nl/nl/privacy