

# Braddell PRIVACY POLICY

## 1. INTRODUCTION

Braddell Limited and its subsidiaries, is committed to protecting the privacy and security of your personal information. We have therefore developed this Privacy Notice to inform you of the data we collect, what we do with your information, what we do to keep it secure, as well as the rights and choices you have over your personal information.

Braddell Limited or one of our subsidiary companies will be the controller for the personal information we process, unless otherwise stated.

You can contact us either by email or post.

Email: [dataprotectionofficer@metroline.co.uk](mailto:dataprotectionofficer@metroline.co.uk)

Post: Data Protection Officer, Metroline Head Office, ComfortDelGro House, 3rd Floor, 329 Edgware Road, Cricklewood, London, NW2 6JP

### Who are we?

Operating under the parent UK entity of Braddell Ltd., a wholly owned subsidiary of Singapore based ComfortDelGro; one of the world's largest passenger land transport companies, we include Adventure Travel, Falcon Coachworks, Irish CityLink, Metroline Travel, Metroline Manchester, Scottish CityLink. As part of the successful ComfortDelGro Group, our main focus is to become the best bus and coach operating company in the UK & Ireland where we provide public transport solutions.

Employing over 10,000 people, we operate the length and breadth of the UK and Ireland with well-known brands such as Metroline, Megabus, Irish and Scottish CityLink, Adventure Travel, where we provide essential transportation services.

## 2. WHAT PERSONAL DATA DO WE COLLECT?

We only collect personal information that we know we will genuinely use and in accordance with the Data Protection Legislation. The type of personal information that we will collect about you, and you voluntarily provide to us may include some or all of the following:

- Your name
- Address
- Email address
- Telephone numbers
- Bank account information
- CCTV video and audio footage
- Vehicle registration information
- Marketing and public consultation – contact information, public feedback, market research, emails for newsletters and promotions
- Claims – claimant and witness information, incident investigations
- Human Resources – applicant information, employee information

# Braddell PRIVACY POLICY

Any of our businesses will request your consent before you register or submit any personal information to us when using our services, website or Apps. Please note that in respect of job applicants and employees this may also include sensitive data, such as that relating to an individual's health. Such data is processed strictly in accordance with this Policy.

You may give us information about you by completing forms on our website, subscribing to our benefits and services or by corresponding with us by phone, e-mail, social media or otherwise. This includes information you provide when you register to use our website, driver recruitment service, participate in discussion boards or other social media functions on our website, enter a competition, promotion or survey and when you report a problem with our website. The information you give us may include but not limited to your name, date of birth, address, country of residence, email address, photo card ID information, phone and mobile number, travel preference information and credit card information.

The personal information may be collected by Braddell, one of our business units or by our contractors on our behalf. At times we may use partners to provide some of our services and they may be required to collect personal information on our behalf. We ensure that all our partners adhere to the requirements under Data Protection Legislation.

## **Information from other sources**

We work with third parties in providing services, for example Metroline engages a website platform provider and website development agency, as well as analytics providers, security and performance maintenance assistance and online survey tools. These third-party companies are data processors for us and only process personal information in line with our instructions. Many of our other business entities will do the same.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- Necessary for performance of a contract or to comply with a legal obligation.
- Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).
- Our use of your data is necessary for our legitimate interests in ensuring that the service we provide to you is administered effectively.
- Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party.

## **If you use contracted services**

Sometimes we obtain details from third parties, for example if we have taken over a contract/bus company, or a complaint is passed to us from Transport for London (TfL), Transport for Greater Manchester (TFGM), Transport for Wales (TFW) or another operator. If you use our contracted services operated on behalf of TfL, TFGM or TFW, the on-bus system will collect personal data from you in connection with your use of Oyster cards, contactless payment cards, or other privilege schemes on our vehicles. This data does not pass through any data management system operated by us where TfL, TFW or TFGM do not permit bus operators access to any personal data collected in this way.

If you want to know more about the information collected from you in connection with your use of a contracted service, then please contact the respective operating body below.

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TFL Customer Services, Transport for London, 14 Pier Walk, North Greenwich, London, SE10 0ES.

TFGM Transport for Greater Manchester, 2 Piccadilly Place, Manchester, M1 3BG

TFW 3 Lllys Cadwyn Pontypridd CF37 4TH

## 3. HOW WE USE YOUR INFORMATION

- To contact you, following your enquiry, reply to any questions, suggestions, issues or complaints you have contracted about;
- Make available our services to you;
- To provide you for services and information about travelling and customer services;
- To resolve disputes, mitigate or attempt to prevent fraud, investigate privacy and security incidents;
- To investigate safety and security incidents on the transit system;
- To run our services and improve them, to benefit passengers and environment and economy;
- To enhance your experience of our website;
- To maintain our business relationship;
- To enable you to submit your information for job applications;
- For employee / driver recruitment; and
- To administer and comply with employment and other relevant UK laws when it comes to Employee Contracts of Employment and staff benefits i.e. group pension

## CCTV

CCTV surveillance is essential for the safety and security of the public and our employees and the prevention and detection of crime. We regularly review the use of surveillance systems and our CCTV policy. We will always clearly display signage so that you are aware that you are in an area where CCTV is operated, and which provides contact details should you require additional information or wish to exercise your rights. When traveling on one of our services, these may at times be provided by a 3<sup>rd</sup> party when the operator specifically is responsible for the collection and processing of data. On each vehicle is information that clearly describes who is the data controller for that vehicle and in the event of a query, where you should direct your questions. When in doubt please use our contact details below and we can advise who was data controller in question and where queries or subject access requests can be directed.

## Disclosing personal data to the police

We may be required to disclose personal data in response to valid requests from the police and other statutory law enforcement agencies.

Before we authorise any disclosure, the police must demonstrate the personal data is necessary to assist them in the prevention or detection of a specific crime, or in the apprehension or prosecution of an offender.

Requests from the police are dealt with on a case-by-case basis to ensure that any such disclosure is lawful in accordance with the Data Protection Law.

## 4. HOW WE STORE YOUR INFORMATION

We retain a record of your personal information to provide you with a high quality and consistent service. We will always retain your personal information in accordance with the Data Protection Legislation and never retain your information for longer than is necessary. Unless otherwise required by law, your data will be stored in accordance with our retention policy, at which point it will be deleted.

## 5. WHO DO WE SHARE YOUR INFORMATION WITH

We do not share or sell your personal information to any other company for marketing purposes unless you have expressly opted in. Third-party companies will be required to use your personal data in accordance with the Data Protection Legislation currently in force. Where we or one of our business units use trusted suppliers to help us deliver our services to you, we allow the supplier concerned limited access to the personal data they need to provide their service. A list of just some of the service suppliers are listed below:

- If the law or a public authority says we must share the personal data;
- If we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk);
- From time to time, we employ the services of other parties for details with certain processes necessary for the operation of the Website
- Group pension suppliers to administer the company group pension to employees;
- Medical supplier, which we use to run medicals;
- Website hosting companies used to administer our website content;
- Third parties to analyse traffic and other pseudonymised data on our website and app and use of our services;
- Market research and analysis organisations working on our behalf;
- Organisations that support our marketing and operational activities;
- Fraud checking and prevention organisations.

## 6. YOUR DATA PROTECTION RIGHTS

Under data protection law, you have rights over your personal data including:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten/erasure** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right to be subject to the legal effects of automated processing or profiling.

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- **Right to data portability** - you have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Please contact us at [dataprotectionofficer@metroline.co.uk](mailto:dataprotectionofficer@metroline.co.uk) if you wish to exercise your rights.

### 7. HOW TO COMPLAIN

If you have any concerns about our use of your personal information, we would like the opportunity to try to resolve the matter. Please contact us at [dataprotectionofficer@metroline.co.uk](mailto:dataprotectionofficer@metroline.co.uk)

If you are still dissatisfied, you can also complain to the ICO using the contact details below.

The ICO's address:  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113  
ICO website: <https://www.ico.org.uk>

### 8. CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Notice from time to time (for example, if the law changes). We recommend that you check this policy regularly to keep up to date.

**This Policy was last updated in January 2025.**