PRIVACY NOTICE

m.connect Transport Booking System

Who we are

Moray Council, Council Office, High Street, Elgin, Moray, IV30 1BX, moray.gov.uk 01343 543451, is a Local Authority established under the Local Government etc. (Scotland) Act 1994. We are the Data Controller of the information being collected.

Why we are collecting your personal data

When you contact the Council's Customer Contact Centre or use the m.connect Passenger App to schedule transportation, the following personal data will be collected from you to provide you with demand responsive transport:

- Your name, address, mobile number, email address, whether you hold a National Entitlement Travel Card, and if you require a wheelchair accessible vehicle.

In order to schedule your requested journey the following will also be collected; the date and time of your requested journey, boarding location, destination location, the number of passengers in your party, and, whether these are children or adults. Payment for the journey can either be made via the Passenger App or on the vehicle.

Information about your previous ten journeys will be recorded to monitor service user travel patterns and resource future m.connect journeys.

Our legal basis

Whenever the Council processes personal data we need to make sure we have a legal basis for doing so. We understand the Council's basis in data protection law to be Article 6(1)(e) of the United Kingdom General Data Protection Regulation (UK GDPR), because your personal information is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Council and the task or function has a clear basis in law – in this case, section 34 of the Transport (Scotland) Act 2019.

Personal data that counts as 'special category data' such as health, ethnicity and religion, must satisfy extra conditions when processed. When you let our Customer Contact Centre know, or select within your profile on the m.connect Passenger App, that you require a wheelchair accessible vehicle, we understand that our legal basis in data protection law for processing this special category data to be UK GDPR Article 9(2)(a) explicit consent, because permission has been freely given to the processing of the data for this purpose.

Who we share this personal data with

The personal information you provide will be stored on the m.connect transport operating and booking system, provided by a third party – Liftango Ltd. We make sure that

they process your personal data appropriately through our contractual arrangements with them. For more information on how Liftango Ltd process personal information, please see the Privacy Policy available on their website here: https://www.liftango.com/privacy-hub/privacy-policy

Your personal data may be shared internally with authorised officers of the Council if having access to personal data is a necessary part of their role. The Council may share your personal data with other relevant Council Services and third parties, where we are under a legal obligation to do so. For example, the Council is required by law to protect public funds against fraud; it may share personal data with other relevant Council Services and third parties responsible for auditing and administering public funds, or who otherwise have responsibility for preventing and detecting fraud.

How long the personal data is held for

Your personal data will be securely stored by Moray Council for a pre-determined length of time. Information is only kept for the minimum amount of time necessary. We maintain a record retention schedule which sets out how long we retain different types of personal data. This is available on our website: www.moray.gov.uk/RetentionSchedules

Inactive profiles will be deleted after a period of 18 months.

Your rights

Moray Council is the Data Controller for this personal data. You have legal rights about the way the Council handles and uses your personal data. These include the right to ask for a copy of it, to ask us to correct it and to ask us to stop doing something with your personal data.

You have the right to withdraw consent to your health data being used for this process at any time, by removing this information from your profile within the m.connect Passenger App, or phoning the Customer Contact Centre on 0300 123 4565.

As so far as the legislation permits, you also have the right to request the deletion of your data, and to object to the processing.

For more information about these rights, please see the Information Management pages on the Council's website here: www.moray.gov.uk/InformationRights. Alternatively, email the Council's Data Protection Officer at: IG@moray.gov.uk

If you have a concern about the way the Council has handled your personal data, you can make a complaint to the Council's Data Protection Officer in the first instance; an e-form is available on the Council's website here: www.moray.gov.uk/Complaints

You also have the right to make a complaint to the Information Commissioner's Office. They are the body responsible for making sure organisations like the Council handle your personal data lawfully.

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113 Website: https://ico.org.uk/
Online: https://ico.org.uk/make-a-complaint/data-protection-complaints/