

Privacy Policy

1. Intro

At GoCollective, we protect your information and therefore we will handle your personal data responsibly, with respect for your privacy, and in full compliance with the General Data Protection Regulation (GDPR) and other legislation.

This privacy policy describes which personal data we process about you and how we handle it. We therefore kindly ask you to read this privacy policy carefully

2. Data controllers and Contact information

First and foremost, we must inform you that the data controllers for the processing of personal data in accordance with this privacy policy are:

GoCollective Rail A/S
Cvr-nr:12245904
Skøjtevej 26
2770 Kastrup
Denmark

The person responsible for data protection at the data controllers can be contacted at:

Dataprotection@gocollective.dk

Or alternatively by sending a letter marked 'Data Protection' to GoCollective Rail A/S, Skøjtevej 26, 2770 Kastrup, Denmark.

3. Definition of 'personal data' and 'processing'

'Personal data' is any form of information about an identified or identifiable person. This includes, for example, your name, address, phone number, and email address. In contrast, information about the number of users on a website is not considered personal data, as it does not pertain to a specific identifiable person.

'Processing' constitutes any form of handling of personal data, such as collection, storage, disclosure, and deletion of personal data.

4. Processing activity

The table in Appendix 1, describes the rules for processing your personal data in various processing activities, including the purpose, legal basis, and retention period for the processing, as well as information on who we receive personal data from or disclose it to as part of the processing, if applicable. Similarly, the table will indicate whether personal data is transferred to third parties as part of the processing.

5. Legal basis for processing your personal data and retention periods

We only retain your personal data if we have a legal basis for doing so, and your personal data will not be processed for longer than it is necessary to fulfill the purposes for which the data was collected, unless we are legally required to do so. The table in Appendix 1 shows the legal basis for the processing and the retention periods applicable to the respective personal data collected.

6. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good user experience when you browse our website and also allows us to improve the website in the future. For detailed information about the cookies we use and their purposes, please refer to our cookie policy, which can be found at the bottom of our website.

7. Information Security

We ensure that there are adequate technical and organizational security measures in place to ensure that your personal data does not fall into the hands of unauthorized third parties. All personal data we receive from you is stored on secure servers. Our employees are trained to comply with data protection regulations, including our own policies and procedures for handling personal data, and we only authorize staff to access personal data if access is necessary for the individual employee to perform their job. We also ensure that all data processors we work with have implemented adequate technical and organizational measures to protect your personal data

8. Collection of personal data from third parties

We only collect personal data from third parties if we have the legal basis to do so and if the collection is relevant to fulfill the purpose of the specific processing activity.

The table in Appendix 1 shows which third parties we may collect personal data from in each processing activity.

9. Disclosure of personal data to independent data controllers

We only disclose personal data for independent processing by other data controllers if we have the legal basis to do so and if the disclosure is necessary in that context.

The table in Appendix 1 shows to whom we may disclose personal data in each processing activity.

10. Transfer of personal data to processors in third countries

We only transfer personal data to processors in third countries (countries outside the EU or EEA) if we have ensured in advance that the necessary and appropriate safeguards are in place to ensure that the level of protection in the relevant country for the processor is adequate in accordance with the General Data Protection Regulation. If we use processors from third countries, the third country will be listed below.

The table in Appendix 1 shows if personal data can be transferred to third countries for each processing activity and, if so, which third countries.

11. Rights as a data subject

When we process personal data about you, you are entitled under the General Data Protection Regulation - subject to the limitations that follow from it - to:

- Access the information we have registered about you,
- Have the information we have registered about you corrected or deleted,
- Withdraw consent if the processing is based on consent,
- Restrict the processing of the information we have registered about you,
- Receive the information we have registered about you in a structured, commonly used, and machine-readable format,
- Object to the processing of the information we have received about you, including the right not to be subject to automated decisions and profiling.

In all cases, you must contact the person responsible for data protection at the data controller if you wish to exercise your rights. Contact details can be found in section 2 above under 'Data Controller(s) and Contact Details'.

You also have the right to lodge a complaint with a supervisory authority. You can find a list of supervisory authorities in the EU and their contact information via the following link: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm

12. Updates to the privacy policy

This privacy policy may be updated in the future.

You can always see at the top of the privacy policy when it was last updated or changed. When we update the privacy policy, we ensure that you are informed in an appropriate manner, tailored to the significance of the updates for you.

13. Questions

If you have any questions regarding this privacy policy or the processing of personal data by us, you can contact us via the contact details provided in section 2 above under 'Data Controller(s) and Contact Details'.

Appendix 1

| Processing activity | Purpose of the processing | The processing includes the following types of personal data | Legal basis | Collection of personal data may occur from the following | Disclosure of personal data may occur to the following | Transfer of personal data may occur to processors in the following third countries | Deletion deadline |
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| General enquiries | When you contact us via our contact forms, app, email, phone, Facebook, or by letter, we collect and process the information you provide to us. The processing is carried out in order to handle and respond to the enquiry. | <ul style="list-style-type: none"> • Name • Contact details (phone number and email) • Content of the enquiry | <ul style="list-style-type: none"> • GDPR, Article 6, Section 1, Letter f) (the balancing of interests rule, where our legitimate interest is to respond to your enquiry) | <ul style="list-style-type: none"> • N/A | <ul style="list-style-type: none"> • N/A | <ul style="list-style-type: none"> • N/A | Until 3 years from the time of the enquiry |
| Recording of phone calls in the customer center | When you contact our customer center by phone, you will be asked if you consent to us recording the phone call for internal employee training purposes. | <ul style="list-style-type: none"> • Audio recording of the phone call • Phone number • Time of the call | <ul style="list-style-type: none"> • GDPR, Article 6, Section 1, Letter a) (consent) | <ul style="list-style-type: none"> • Call to the customer center | <ul style="list-style-type: none"> • N/A | <ul style="list-style-type: none"> • N/A | Within 30 days after the conversation |

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| <p>Application for compensation via travel time guarantee</p> | <p>When you apply for compensation via our travel time guarantee, we collect and process the information you provide to us in the application.</p> | <ul style="list-style-type: none"> • Name • Address • Contact (phone number and email) • Card number (for commuter travel time guarantee) • Optionel: Account number • Optionel: CPR number (if transfer to NemKonto) | <ul style="list-style-type: none"> • GDPR, Article 6, Section 1, Letter b) (fulfillment of contract) • GDPR, Article 6, Section 1, Letter f) (legitimate interest balancing test) | <ul style="list-style-type: none"> • N/A | <ul style="list-style-type: none"> • N/A | <ul style="list-style-type: none"> • N/A | <p>Up to 3 years from the time of application</p> |
| <p>Subscription to newsletter</p> | <p>When you subscribe to our newsletter, we collect and process the information you provide to us during the subscription. We also continuously collect information about the reading and interaction with newsletters to target marketing.</p> | <ul style="list-style-type: none"> • Name • Address (optional) • Birthday (optional) • Contact details (phone number and email) • Card number (optional) • Tracking of reading and interaction; whether emails are opened and which elements are clicked on • The medium from which the | <ul style="list-style-type: none"> • GDPR, Article 6, Section 1, Letter a) (consent) | <ul style="list-style-type: none"> • N/A | <ul style="list-style-type: none"> • N/A | <ul style="list-style-type: none"> • N/A | <p>Up to 3 months after you have unsubscribed</p> |

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| | | subscription was made and when | | | | | |
| Purchase of tickets/commuter cards | When you purchase a train ticket or commuter card, we collect and process the information you provide to us at the time of purchase. | <ul style="list-style-type: none"> • Name • Address • Contact details (phone number and email) • Optional: Card number • ID type + 4 digits from ID • Payment information • Portrait photo (for commuter card purchase) | <ul style="list-style-type: none"> • GDPR, Article 6, Section 1, Letter b) (fulfillment of contract) | <ul style="list-style-type: none"> • N/A | <ul style="list-style-type: none"> • For the purpose of ticket control and validation, information about your commuter card is shared with DSB (Telegade 2, 2630 Taastrup, CVR number 25050053), which operates the nationwide platform for ticket control. Personal data therein is handled and deleted in accordance with DSB's privacy policy and deletion deadlines. | <ul style="list-style-type: none"> • N/A | Up to 3 years from the purchase. (Accounting information will be retained for 5 full fiscal years after purchase) |
| Issuance of a control fee | If you are issued a control fee by us, we collect and process the information we receive from you at the time of issuance. | <ul style="list-style-type: none"> • Name • Address • Date of birth • Presented ID • Optional: Photo of presented ID • CPR number <p>Additionally, a subsequent verification of name, address,</p> | <ul style="list-style-type: none"> • GDPR, Article 6, Section 1, Letter c) (legal obligation) • GDPR, Article 6, Section 1, Letter f) (legitimate interest balancing test, where our legitimate inter- | <ul style="list-style-type: none"> • N/A | <ul style="list-style-type: none"> • Public authorities (including the collection authority) | <ul style="list-style-type: none"> • N/A | Up to 3 years from issuance. (Accounting information will be retained for 5 full fiscal years after purchase) |

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| | | and CPR number may be conducted with the CPR register. | <p>est is the collection of the control fee)</p> <ul style="list-style-type: none"> • Legal basis for processing CPR number is the Data Protection Act (DBL) § 11, Section 2, No. 4, cf. DBL § 7, Section 1 and GDPR Article 9, Section 2, Letter f (legal claim rule) | | | | |
| <p>Use of cameras in ticket control (Bodycams)</p> | <p>GoCollective's customer service employees, who conduct ticket control in GoCollective's trains and any replacement buses/doubling buses, may wear body cameras during ticket control.</p> <p>The purpose is to prevent and investigate incidents of violence and threats against staff and to ensure a</p> | <ul style="list-style-type: none"> • The camera stores audio and video recordings, but only when the employee activates the camera. • Information about criminal offenses: Potentially criminal offenses may be recorded. | <ul style="list-style-type: none"> • General personal data: GDPR, Article 6, Section 1, Letter f (legitimate interest balancing test) • Information about criminal offenses: DBL § 8, Section 3, 2nd sentence • GoCollective Trains' legitimate interest is to ensure the safety and security of its employees in ticket control situations. | <ul style="list-style-type: none"> • Audio and video recordings are collected via body-worn cameras (bodycams). | <ul style="list-style-type: none"> • Public authorities (including the police), if we assess that a police report is necessary due to a criminal offense. | <ul style="list-style-type: none"> • N/A | <p>7 days from the recording, unless longer retention is necessary due to an ongoing case.</p> |

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| | <p>safe working environment.</p> <p>The camera is only activated in a few cases where it is necessary for the safety of the employee and surrounding customers.</p> <p>Employees with cameras will carry visible information that audio and video recording may take place</p> | | | | | | |
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