

# Tracsis Traffic Data Privacy Notice

## BACKGROUND:

At Tracsis Traffic Data, we value your privacy and are committed to protecting your personal information. This Privacy Notice is designed to help you understand how we collect, use, share, and safeguard your data when it is collected as part of our processing activities. We know and understand that your privacy is important to you, and that you care about how your personal data is used. We respect and value the privacy of everyone whose data is collected as part of our services and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Notice carefully and ensure that you understand it and rest assured that we will only use the information obtained as outlined in this Privacy Notice.

## 1. Information We Collect

We may collect the following types of information during our market research surveys:

- Personal Information: Physical appearance and mode of transport are collected as part of our processing activities. This also includes date, time, and location data of where the video imagery was collected.

## 2. How We Use Your Information

We use the information collected in market research surveys for the following purposes:

- We use the information collected to analyse accurate active travel data for our client West Yorkshire Combined Authority to support active travel improvements and meet targets for walking and cycling. The output of the data is completely anonymous.

## 3. Why We Collect Your Data

We collect your data on behalf of our client West Yorkshire Combined Authority to provide transport active mode data in the form of monitoring active travel movements via video counts. This is to help our client understand what modes of active transport are being used; understanding trend analysis from previously collected data; any restrictions to using active travel modes; and understand how the service can be improved.

Our legal basis for collecting your data, depending on the client are:

- Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

#### 4. How we Share Your Personal Data

We collect your data on behalf of our clients, whom have a legal basis for collection of the data requested from you. We do not share your personal data with any other third parties or suppliers other than those suppliers that provide technical support to our products and services who have restricted access and are bound within the confines of data protection law.

#### 5. How We Store and Delete Your Data

We will retain your personal data for as long as necessary to fulfil the purposes outlined in this Privacy Notice. After this period, we will securely delete or anonymise your data.

#### 6. What Are Your Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 10.
- b) The right to access the personal data we hold about you. Part 9 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 10 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 10 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 10.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves however, so please contact us first, using the details in Part 10.

## 7. How We Secure Your Data

We take all reasonable measures to protect your personal information from unauthorised access, disclosure, alteration, or destruction.

## 8. How and Where Do We Store or Transfer Your Personal Data?

We will only store your personal data in the UK or the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. As part of our processing arrangements we transfer video footage for analysing with our trusted third-parties partner based in India who are bound by contract to UK GDPR via Standard Contract Clauses (SCCs) and Data Processing Agreement (DPA).

## 9. How Can You Access Your Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 10.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request at the earliest opportunity and within one month of receipt of the request. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 10. How Do You Contact Us?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of the data protection office):

- Email address: [dataprotectionoffice@tracsis.com](mailto:dataprotectionoffice@tracsis.com)
- Telephone number: 0845 125 9162
- Postal Address: Tracsis PLC, Nexus, Discovery Way, Leeds, West Yorkshire, LS2 3AA, United Kingdom

## 11. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our website and you will be deemed to have accepted the terms of the Privacy Notice on your first use of our website following the alterations. We recommend that you check this page regularly to keep up to date. This Privacy Notice was last updated on 6<sup>th</sup> October 2023.