

Arriva Plc Privacy Policy

Last updated: 16 April 2019

Arriva Plc ("We") are committed to protecting and respecting your privacy.

This policy (together with our Website Terms of Use (<https://www.arrivabuy.com/group/>) and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://www.arrivabuy.com/group/> or providing your information in the circumstances described below, you are accepting and consenting to the practices described in this policy.

For the purpose of Data Protection Legislation, the data controller is Arriva Plc of 1 Admiral Way, Doxford International Business Park, Sunderland SR3 3XP.

1. What personal data do we collect?

Information provided by you. You may give us information about you by filling in forms on our site <https://www.arrivabuy.com/group/> (**our site**) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site or submit information in connection with procurement activity.

The information you give us may include:

- your name,
- address,
- e-mail address
- phone number.

2. Cookies

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our sites. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy in Appendix 5.

3. How do we use your personal data and what is the legal basis for such processing?

The collection of the personal data described above is usually mandatory and, if such personal data is not provided, we will not be able to provide the information and services to you. Where the collection of any personal data is not mandatory, we will inform you of this prior to collection, as well as the consequences of failing to provide the relevant personal data.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally process your personal information only:

- where we have your consent to do so;
- where the processing is necessary to perform our contract with you;

- where the processing is in our legitimate interests or those of a third party and such interests are not overridden by your data protection interests or fundamental rights and freedoms; or
- where we have a legal obligation to process your personal information.

Information provided by you. We use your personal information as follows:

Purpose of processing	Legal basis for processing
Site registration	Consent
Progression of procurement activity	Performance of a contract
Corresponding with you in connection with procurement activity	Performance of a contract

4. Sharing Your Information

We may disclose your personal data to the following categories of recipient for the purposes described in this Privacy Notice:

- **third party service providers** who will process personal data on our behalf (such as IT service providers, communications service providers and analytics providers)

We may also disclose your personal data to **any competent law enforcement body, regulator, government agency or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation; (ii) to exercise, establish or defend or legal rights; or (iii) to protect your vital interests or those of any other person.

We may also transfer your personal data to a **buyer or potential buyer (and its agents and advisers)** in connection with any reorganisation, restructuring, merger or sale, or other transferring of assets provided that we inform any receiving party it must use your personal information only for the purposes disclosed in this Privacy Notice.

Finally, we may disclose your data to any other person to whom you request us to make disclosure or if you consent to such disclosure.

5. Data Retention

We will not retain your personal data for longer than is necessary to fulfil the purposes for which we collected that personal information, unless the law permits or requires that we retain it for longer.

The table below explains in more detail how long Arriva Plc will store different types of information for:

Information	Retention
Account information	Until the account holder requests to be removed from the site.
Correspondence	<u>For the duration of the relevant procurement, plus an additional six years after the relevant procurement is closed</u>
Procurement submissions	<u>For the duration of the relevant procurement, plus an additional six years after the relevant procurement is closed</u>

6. Information Security

We apply appropriate administrative, technical and organisational security measures to protect your personal data that is under our control from unauthorised access, collection, use, disclosure, copying, modification or disposal. All information you provide to us is stored on secure servers. Arriva plc trains its employees regarding its data privacy policies and procedures and permits authorised employees to access personal data on a need to know basis, as required for their role.

We also take steps to ensure that any service provider that we engage to process personal data on our behalf takes appropriate technical and organisational measures to safeguard such personal data.

7. Transferring Information Internationally

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country. However, we have taken appropriate safeguards to require that your personal data will remain protected in accordance with this Privacy Notice. These safeguards may include implementing the European Commission's Standard Contractual Clauses for transfers of personal information to our third party service providers and further details can be provided upon request.

8. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

9. Your Data Protection Rights

You have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us at any time at data.protection@arriva.co.uk.

- In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us at data.protection@arriva.co.uk.
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information (including after your withdrawal) conducted in reliance on lawful processing grounds other than consent.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

10. Questions about this Privacy Notice

If you have any question, concerns or complaints about this Privacy notice or our handling of your personal data, you can contact us by email on data.protection@arriva.co.uk.

If you are unsatisfied with the response, you can contact Arriva plc's Data Protection Officer at data.protection@arriva.co.uk.

You have the right to complain to a data protection authority about our collection and use of your personal information. If you are based in the European Economic Area, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries are available on the EU Commission's website via the following link): http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm)

The controller of your personal data is Arriva Plc.