

## **Privacy Notice – ISSUANCE OF MOTION CARDS**

This Privacy Notice sets out how **CPT CYPRUS PUBLIC TRANSPORT SERVICES AND OPERATIONS LIMITED** (“**We**” or the “**Company**” or “**Us**”) collects and processes personal data for the customers, students and Parents/ Legal Representatives/Guardians of the students (“**You**” or “**Yours**”).

This Privacy Notice contains all the information that is required by the Company, as a Data Controller and in accordance with the provisions of the EU General Data Protection Regulation 2016/679 (“**GDPR**”), to provide you, and in relation to the purposes of collection and processing of personal data.

### **1. What data do we collect?**

The personal data that we may collect from you, is the following:

1. Name and Surname
2. Mailing Address (including, inter alia, Street name, Flat number and Postal code, city)
3. Identification document (including, inter alia, Nationality, identification number, Date of birth)
4. Residence country
5. Telephone/mobile number
6. Email address
7. Information of academic institution in attendance (if applicable)

### **2. Purpose of the Collection**

Your data is processed in a legal, equitable and transparent manner, pursuant to the given parental consent of the parents/legal representatives/guardians with respect to personal data collected for the students, the contractual obligations of the company and the legitimate interest of the company. We collect your personal data for the purpose of the issuance of the Motion Cards, in the course of the transportation services via bus to customers in general and students of secondary and technical education:

- a. To assess the efficiency of the routes.
- b. To demonstrate compliance with its contractual obligations with the Ministry of Transport, Communications and Works and relevant guidelines issued from time to time.
- c. To satisfy the legitimate interest of the company as to ensure the safety of the customers and students.

We do not use any form of automated processing of personal data or profiling during the processing of your personal data.

### **3. Data Storage**

We store your personal data in our Head Offices in Nicosia, where they are kept secured and protected with enhanced security measures. For the secure storage of your personal data the company takes all the necessary technical and organizing measures to ensure that the processing is carried out in accordance with the provisions of the GDPR (controlled access, firewalls, antivirus, encrypting data etc.).

### **4. Disclosure Of Your Information**

Within CPT, your personal data is accessible only to those who need to, with a duty of confidentiality and only for the purposes mentioned in paragraph 2 above.

We choose our associates very carefully, after the necessary checks have been carried out and sufficient guarantees have been provided to implement appropriate technical and organizational measures in such manner that processing will meet the requirements of the GDPR and the relevant laws and ensure the protection of your rights.

The external recipients of your personal data may also be any other persons, entities, or relevant authorities to whom your data may need to be disclosed for the purposes stated in paragraph 2 and especially for compliance with our legal and regulatory obligations.

### **5. Retention of Data**

In accordance with Company's Retention policy, your data is kept only for as long as necessary to fulfil the purposes specified in paragraph 2. In addition, we retain your personal data for as long as necessary to comply with local laws, to exercise our legal rights and generally to pursue our legitimate interests. After this period, your personal data will be irreparably destroyed.

### **6. Effect of the Privacy Notice**

This Private notice applies in combination with any other notification, internal policies, contractual clauses and consents that may be relevant to collection, use and disclosure of your personal data by our company.

### **7. Your rights**

As a data subject, you can contact us at any time and exercise your rights. These rights are as follows:

- The right to receive information about the processing of data and a copy of the processed data.
- The right to request the correction of inaccurate data or the completion of incomplete data.
- The right to request the deletion of personal data.
- The right to request a restriction on data processing.
- The right to receive the personal data concerning the data subject in a structured, commonly used and machine-readable format and to request the transfer of this data to another controller in certain cases.
- The right to object to the processing of data.
- The right to withdraw a given consent at any time to stop a data-based consent processing.
- The right to complain to a competent supervisory authority.

Should you require to exercise any of your rights please do so by contacting us at by email at [dpo@publictransport.com.cy](mailto:dpo@publictransport.com.cy), or by post at CPT Cyprus Public Transport Services and Operations Ltd, Griva Digeni 81-83, 6th floor, 1090 Nicosia, Cyprus.

In the event that you wish to complain about how we have handled your personal data, you may contact us at the above email address and corresponding address. We will then look into your complaint and work with you to resolve the matter.

If you still feel that your personal data has not been handled appropriately according to the law, you can submit your complaint with the Office of the Commissioner for Personal Data Protection, at 1 Iasonos Street, 2<sup>nd</sup> Floor, 1082 Nicosia, tel. +357 22 818456, email address: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy).

#### **8. Changes to this Privacy Statement**

This privacy statement was published on 16-02-2022 and was last updated on 16-02-2022.

Changes to this Privacy Statement may be made from time to time and we will notify you when we do so through our website.