



Bucklebury Community Bus : Privacy Notice

Ver 1.7, February 2019

*The text below sets out the Bucklebury Community Bus's Privacy Policy. We're updating our Policy as of **30th January 2019**. Here are some of the changes you'll see:*

- We've updated the policy to reflect the installation of internal and external CCTV in the bus; used for passenger safety, insurance, incident and crime reporting

This updated Policy gives you more control over your information and more clearly explains how we use it and what we use it for.

Contents

Updates to This Policy.....	2
Who We Are.....	2
How This Policy Applies.....	3
What We Collect and Receive.....	3
How We Use This Information.....	3
European Union Users.....	4
How This Information Is Shared.....	4
Information that’s shared with trusted third-party services.....	5
Links to other websites and services.....	5
Retention.....	5
Data Transfers.....	5
Your Rights.....	5
Email and Social Media Notifications.....	6
Security.....	6
CCTV (Video Recording).....	6
Data Protection Authority.....	7
Children.....	8
Cookies.....	8

Updates to This Policy

We may update this Policy from time to time. If we do, we’ll let you know about any material changes by notifying by sending you an email. New versions of this Policy will never apply retroactively — we’ll tell you the exact date they go into effect. If you keep using the Bucklebury Community Bus after a change, that means you accept this Policy.

Who We Are

The Bucklebury Community Bus and their parents, subsidiaries, affiliates, agents, representatives, consultants, employees, Trustees, and directors — collectively, “The Bucklebury Community Bus Committee,” “we,” or “us” or ‘The Trustees’) provides services that help run the Bucklebury Community Bus. Our main service is service to safely transport children from Upper Bucklebury to the Kennet School (and when required to transport pupils from Thatcham to Bucklebury Primary School. We are a charity based in Upper Bucklebury, Berkshire, U.K.

How This Policy Applies

This Policy describes the information we collect from you, how we use that information and our legal basis for doing so. It also covers whether and how that information may be shared and your rights and choices regarding the information you provide to us.

By using the Services offered by Bucklebury Community Bus, you're acknowledging you have agreed to our Terms of Use and that you have read and understood this Privacy Policy.

What We Collect and Receive

In order for you and your child(ren), to use the Bucklebury Community Bus, we need to collect and process certain information. Depending on your use of the Services, that may include:

- Information you provide by completing registration forms to sign-up to the service — your name, email and postal addresses, telephone number, country of residence. We may ask for this information if you register as a user of the Services, subscribe to our newsletters, or if you contact us;
- Information you may provide for identity verification purposes when subscribing to our service, including your legal name, business name and any forms of photo ID (driving licence), and date of birth. We have a defined set of policies and procedures relating to the storage and deletion of data.
- Details of any requests or transactions you make through the Services – normally via email.
- Communications you send to us (for example, when you ask for support, send us questions or comments, or report a problem); the email address you use to communicate with us.

How We Use This Information

We use the information we collect for the following purposes:

- To record who are registered users of the Service
- To enable us to provide you with our Services, and to communicate with you in relation to the Service e.g. changes to bus timetables or disruptions due to weather.

You may decline to provide us with your information. However, this will limit your ability to use our Service.

European Union Users

Data protection law in Europe requires a “lawful basis” for collecting and retaining personal information from citizens or residents of the European Economic Area. Our lawful bases include:

- Performing the contract we have with you: In certain circumstances, we need your personal data to comply with our contractual obligation to deliver the Services,
- Legitimate interests: This is a technical term in data protection law which essentially means we have a good and fair reason to use your data and we do so in ways which do not hurt your interests and rights. We sometimes require your data to pursue our legitimate interests in a way that might reasonably be expected as part of running our charity and that does not materially impact your rights, freedom or interests.

For example, we use your email address and identity to communicate information about bus schedules or information related to the running of the service and the Users. We may also send you promotional communications about our Services, subject to your right to control whether we do so.

How This Information Is Shared

Information that’s shared publicly

We do not share any personally identifiable information publicly. Some information provided by you may be shared with the Trustees to facilitate the effective operation of the service e.g. your email address and child’s name.

Information that isn’t shared publicly

The following data will not be shared publicly. Some data may be revealed to Trustees to enable them to operate the Service:

- Any payment information you provide;
- Your address
- Your child’s name
- A photograph of your child
- Your phone number
- Your date of birth and other identity verification documentation (if applicable);
- Communications you send to us (for example, when you ask a question, or report a problem).
- Temporary video recordings of your child when they use the bus which are overwritten ~7 days or whenever the video storage is full

Information that's shared with trusted third-party services

We may share your information with certain trusted third-party services such as Kennet School to help us provide the Service. When we share data with third-party services that support our delivery of the Service, we require that they use your information only for the purposes we've authorized, and that they protect your personal information at least to the same standards we do. We may also share information that's aggregated and anonymized in a way that it doesn't directly identify you e.g. reporting on how many children use the Service.

Links to other websites and services

Our Website acts primarily as an information portal and download point for documents such as this privacy policy. With the exception of cookies (see below), and messages sent via the 'contact us' form, we do not store or capture any personal data from you via the website.

Retention

We will retain your information as long as you are a user of the Service, as necessary to provide you with the Services or as otherwise set forth in this Policy. We will also retain and use this information as necessary for the purposes set out in this Policy and to the extent necessary to comply with our legal obligations

Data Transfers

Any data that we transfer to third parties will be strictly on a need to operate the service e.g. child name for bus passes or requests from the Police for CCTV data in the interest of criminal investigation. Data in transit will always be stored on encrypted media so it is inaccessible to anyone should it be lost or stolen.

Your Rights

Users residing in certain countries, including the EU, are afforded certain rights regarding their personal information. Except where an exception or exemption applies, these rights include the ability to access, correct, and request deletion of your personal information.

You can request a copy of your personal data from by emailing the Bucklebury Bus Chair of Trustees (buckleburybus@gmail.com) . To modify or delete the personal information you've provided to us, please contact us. We may retain certain information as required by law or as necessary for our legitimate business purposes.

Email and Social Media Notifications

We want to communicate with you only if you want to hear from us. We try to keep emails to a minimum and give you the ability to opt in to any marketing communications we send.

We will continue to send you email relating to your use of the Service. You may also elect to receive certain marketing email communications, in accordance with your preferences, and from which you may opt out at any time by emailing us.

We'll also send you service-related announcements when it's necessary to do so e.g. changes to bus timetables.

Security

We take security seriously, and the security of your personal data is important to us. We follow industry-standard practices to protect the data we collect and maintain. No method of transmission over the internet or electronic storage is completely secure, so we cannot guarantee its absolute security. Any data that you share with us and is recorded by us in is protected by a password, which adheres to industry recommendations regarding minimum password length, complexity and frequency of change.

CCTV (Video Recording)

As of January 2019, the Bucklebury Community bus has been fitted with both internal and external video recording cameras. Our Lawful Basis for doing this is one of Legitimate Interest.

By using the Service, you understand that users of the bus will have (temporary) video recordings of them made.

We operate CCTV for the following purposes:

- Health and safety of employees, passengers and other members of the public using the Service; and
- Prevention and detection of crime and anti-social behaviour.

The CCTV recordings will only be viewed in the event that there is an incident that requires further investigation.

Data Retention : Length of time CCTV footage is kept

CCTV footage on the bus is generally held for a maximum of 7 days from the time of recording, unless the footage is used for investigation of an incident or accident in which case the footage will be retained until the incident is investigated, closed and the video no longer required as evidence.

Disclosing CCTV/personal data to the police

If requested, we may disclose CCTV recordings in response to valid requests from the Police and other statutory law enforcement agencies. We will inform you if a request has been made.

Before we authorise any disclosure, the police have to demonstrate that the CCTV/personal data are necessary to assist them in the prevention or detection of a specific crime, or in the apprehension or prosecution of an offender.

Requests from the police are dealt with on a case-by-case basis to ensure that any such disclosure is lawful and in accordance with the data protection law (DPL).

Notification : There are signs on the interior and exterior of the bus clearly indicating that CCTV is in use,

CCTV and the ICO : Bucklebury Bus is a registered charity and is registered with the Information Commissioners Office (ICO). Our registration with the ICO means that the ICO are aware that we use CCTV under the lawful basis described above.

Data Protection Officer

As we have fewer than 250 employees, we do not have an appointed Data Protection Officer (DPO). You can contact us about questions or concerns you may have relating to data protection, privacy, storage and removal by emailing us.

Data Protection Authority

Subject to applicable law, if you are a citizen or resident of the European Economic Area, you also have the right to (i) object to The Bucklebury Community Bus use of your personal information and (ii) lodge a complaint with the Information Commissioner's Office, which is the lead supervisory authority in the European Union; details below.

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire
SK9 5AF,
United Kingdom
Telephone: +0303 123 1113
Fax: 01625 524510
Web: <https://ico.org.uk/global/contact-us/>

Children

The Service has been created primarily for the benefit of and use by children. In order to run the Service, we record the following information;

- Name of child using the service
- Name of child's parent
- Child's primary address
- Parent's contact number (mobile or fixed line)
- A photograph of the child
- The school year your child(ren) is / are in
- Temporary video recordings of your child when they use the bus which are overwritten every 7 days

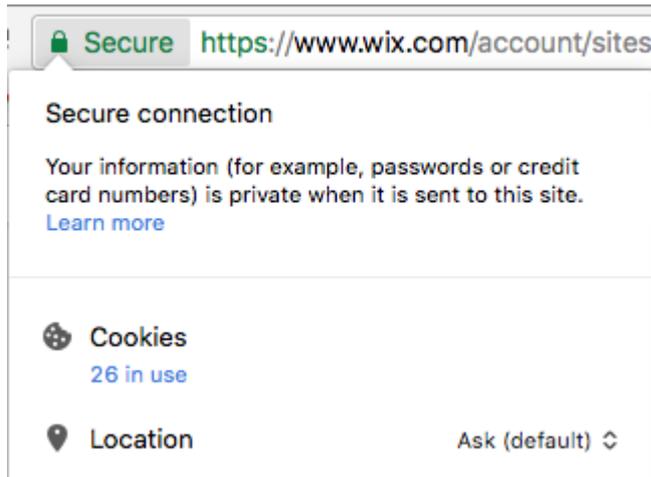
Cookies

Cookies are implemented in every site built by Wix (which is what our site is built on). The table below shows which cookies Wix implements on Wix sites:

Cookie name	Life span	Purpose
svSession	Permanent	Creates activities and BI
Hs	Session	Security
incap_ses_\${Proxy-ID}_\${Site-ID}	Session	Security
incap_visid_\${Proxy-ID}_\${Site-ID}	Session	Security
nlbi_{ID}	Persistent cookie	Security
XSRF-TOKEN	Persistent cookie	Security
smSession	Two weeks	Identify logged in site members

- **Note:**

Wix business solutions (e.g. Wix Stores, Wix Restaurants, Wix Bookings, etc.) and third-party apps may use cookies that aren't listed in the table above. You can check which cookies are used on these platforms using Chrome's built-in cookie view. Just click `Secure` next to the URL bar and then click `cookies`. Make sure that you are viewing your site in incognito mode, so that your browser doesn't detect your own cookies too.



< end >