

**Keolis Amey Docklands Limited**  
**External Privacy Notice**

*Date:* 25 May 2018

Keolis Amey Docklands Limited (**KAD**) respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

**What does KAD do?**

KAD is a joint venture between Keolis and Amey which has been awarded the franchise to run and maintain the DLR.

More information about KAD can be found on our website: <http://keolisameydocklands.info/>.

**What personal information does KAD collect and why?**

The personal information that we may collect about you broadly falls into the following categories:

- Information that you provide voluntarily

We ask you to provide certain information voluntarily. The types of information we ask you to provide, and the reasons why we ask you to provide it, include:

<b>Types of personal information</b>	<b>Why we collect it</b>
<ul style="list-style-type: none"><li>• Name, postal address, e-mail address and phone number</li><li>• Any other information that you elect to provide to us on one of our forms or at any other time. This may include the company you work for, your job title, national insurance number, your line manager and their contact details.</li></ul>	<ul style="list-style-type: none"><li>• To contact you – for example, if you have applied to attend one of our training courses, we will use your contact information to confirm your place on a course, send you our invoice, provide you with joining instructions and any follow-up communications including confirmation of your completion of the relevant training course.</li><li>• To contact your line manager if there are any issues which we need to report to them.</li></ul>

	<ul style="list-style-type: none"> <li>We may also use this information to ensure that we can distinguish you from other people who may share the same name as you (e.g. by using your national insurance number).</li> </ul>
<ul style="list-style-type: none"> <li>Details of our relationship with you</li> </ul>	<ul style="list-style-type: none"> <li>To maintain our business records – for example, if you have attended a training course, we will keep a record of this together with copies of any other records which we require (e.g. copies of any certificates which are required to demonstrate that we complied with our legal obligations when you attended our training course).</li> </ul>
<ul style="list-style-type: none"> <li>Your image where it is included on photos or videos</li> </ul>	<ul style="list-style-type: none"> <li>We may collect your image on CCTV or body-worn camera systems where you use the DLR network <u>or</u> where you specifically agree that we may use your image – for example, where you agree that we can use a photo or video of you for our internal promotional, educational or training purposes.</li> </ul>
<ul style="list-style-type: none"> <li>Health data including drug and alcohol testing reports and medical reports.</li> </ul>	<ul style="list-style-type: none"> <li>We only collect data about your health where it is necessary for us to comply with a legal obligation. Health and safety on the DLR is a critical issue and we are required to comply with laws to ensure that any personnel who we authorise access to the DLR are fit to operate in a high-risk environment. This includes compliance with the Railways and Other Guided Transport Systems Regulations. To comply with these laws it is necessary for us to ensure that you are fit to operate in this environment and we will use drug and alcohol tests and medical reports to assess this.</li> </ul>

If we ask you to provide any other personal information not described above, then the personal information we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect your personal information.

- *Information that we obtain from third party sources*

From time to time, we may receive personal information about you from third party sources (for example, from your employer where you are attending one of our training courses which is being paid for by your employer), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

### **Who does KAD share my personal information with?**

We may disclose your personal information to the following categories of recipients:

- to our **group companies, third party services providers and partners** who provide data processing services to us, or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information – this would include companies that we work with who provide the electronic systems which store KAD's data including AWS, Microsoft, iomart and SoftCat.
- to any **competent law enforcement body, regulatory, government agency, court 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 our legal rights, or (iii) to protect your vital interests or those of any other person – this would include organisations like the British Transport Police, the Office of Rail and Road and the Health and Safety Executive;
- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice – this would include another company which replaces KAD as the operator of the DLR franchise;
- to any **other person with your consent** to the disclosure.

### **Legal basis for processing personal information**

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.

We will normally collect personal information from you only where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms or where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person (for example, we may be required by The Railway and Other Guided Transport Systems Regulations to collect information about you to ensure that you are fit to be provided with training on our network).

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us” heading below.

### **How does KAD keep my personal information secure?**

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include ensuring our staff have received data protection training, staff policies which set out our commitment to respecting your right to privacy, ensuring that hard copy documentation is kept in secure lockable cabinets and saving documents in electronic format into systems which have secure user access controls in place.

### **International data transfers**

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 (and, in some cases, may not be as protective).

Specifically, KAD's servers are located in the United Kingdom, and our group companies and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information to organisations who process your personal information on our behalf outside the European Economic Area and which requires them to protect personal information they process from the UK in accordance with European Union data protection law.

### **Data retention**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

### **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 using the contact details provided under the "How to contact us" heading below.
- In addition, if you are a resident of the European Union, 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 using the contact details provided under the "How to contact us" heading below.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "How to contact us" heading below.
- Similarly, if we have collected and process 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 conducted in reliance on lawful processing grounds other than consent.

- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)

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

### **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.

### **How to contact us**

If you have any questions or concerns about our use of your personal information, please contact KAD's data protection team at [dataprotection@keolisameydlr.co.uk](mailto:dataprotection@keolisameydlr.co.uk).

The data controller of your personal information is Keolis Amey Docklands Limited which is registered with the Information Commissioner's Office with registration number ZA286903.