

General Data Protection Regulation (GDPR) Compliance for TFL License Operator- LONDON TRAVEL PROTECTION LIMITED

1. Introduction

This document outlines the GDPR compliance framework for LONDON TRAVEL PROTECTION LIMITED, a Transport for London (TfL) license operator. It details the policies and procedures in place to ensure that personal data is collected, processed, stored, and disposed of in a manner that complies with the GDPR.

2. Scope

This policy applies to all personal data processed by LONDON TRAVEL PROTECTION LIMITED, including data related to passengers, employees, contractors, and any other individuals whose data is collected or processed in connection with TfL operations.

3. Data Protection Principles

LONDON TRAVEL PROTECTION LIMITED adheres to the following GDPR principles:

- **Lawfulness, Fairness, and Transparency:** Personal data shall be processed lawfully, fairly, and in a transparent manner.
- **Purpose Limitation:** Data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data Minimization:** Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- **Accuracy:** Personal data shall be accurate and, where necessary, kept up to date.
- **Storage Limitation:** Personal data shall be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed.
- **Integrity and Confidentiality:** Personal data shall be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.
- **Accountability:** LONDON TRAVEL PROTECTION LIMITED shall be responsible for, and be able to demonstrate compliance with, these principles.

4. Legal Basis for Processing

LONDON TRAVEL PROTECTION LIMITED shall ensure that all personal data is processed based on one of the following legal grounds:

- The data subject has given consent.
- The processing is necessary for the performance of a contract to which the data subject is a party.
- The processing is necessary for compliance with a legal obligation.
- The processing is necessary to protect the vital interests of the data subject or another person.

- The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.
- The processing is necessary for the legitimate interests pursued by LONDON TRAVEL PROTECTION LIMITED or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

5. Data Subject Rights

LONDON TRAVEL PROTECTION LIMITED recognizes and upholds the rights of data subjects under GDPR, including:

- **Right to be Informed:** Individuals have the right to be informed about the collection and use of their personal data.
- **Right of Access:** Individuals have the right to access their personal data and supplementary information.
- **Right to Rectification:** Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete.
- **Right to Erasure:** Individuals have the right to have personal data erased, also known as the right to be forgotten.
- **Right to Restrict Processing:** Individuals have the right to request the restriction or suppression of their personal data.
- **Right to Data Portability:** Individuals have the right to obtain and reuse their personal data for their own purposes across different services.
- **Right to Object:** Individuals have the right to object to the processing of their personal data in certain circumstances.
- **Rights Related to Automated Decision-Making and Profiling:** Individuals have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects them.

6. Data Protection Officer (DPO)

LONDON TRAVEL PROTECTION LIMITED has appointed a Data Protection Officer (DPO) responsible for overseeing GDPR compliance. The DPO's responsibilities include:

- Informing and advising LONDON TRAVEL PROTECTION LIMITED and its employees about their obligations under GDPR.
- Monitoring compliance with GDPR and LONDON TRAVEL PROTECTION LIMITED 's data protection policies.
- Providing advice on data protection impact assessments (DPIAs).
- Cooperating with the Information Commissioner's Office (ICO) and acting as the contact point for data subjects and the ICO.

7. Data Security

LONDON TRAVEL PROTECTION LIMITED implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including:

- **Data Encryption:** Personal data is encrypted both in transit and at rest where applicable.
- **Access Control:** Access to personal data is restricted to authorized personnel only.
- **Data Breach Management:** A data breach response plan is in place to promptly address any data breaches, including notifying the ICO and affected individuals within 72 hours where required.

8. Data Processing Agreements

When engaging third-party processors, LONDON TRAVEL PROTECTION LIMITED ensures that appropriate Data Processing Agreements (DPAs) are in place. These agreements ensure that third-party processors also comply with GDPR requirements and adequately protect personal data.

9. Data Retention

LONDON TRAVEL PROTECTION LIMITED retains personal data only for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Data retention schedules are in place to ensure compliance with this policy.

10. Data Protection Impact Assessments (DPIAs)

LONDON TRAVEL PROTECTION LIMITED conducts Data Protection Impact Assessments (DPIAs) for any processing activities that pose a high risk to the rights and freedoms of individuals. The DPIAs are used to identify and mitigate risks associated with data processing activities.

11. Training and Awareness

LONDON TRAVEL PROTECTION LIMITED ensures that all employees and contractors who have access to personal data receive regular training on GDPR compliance and data protection best practices.

12. Policy Review

This GDPR compliance policy is reviewed annually or when there are significant changes in data protection laws, regulations, or business operations that impact data protection.

13. Contact Information

For any questions or concerns regarding this GDPR policy or the handling of personal data, individuals may contact the Data Protection Officer at:

Data Protection Officer

ZAHOOR AFSAR AKTHAR

Email: contact@bacarhire.co.uk

Phone: +44 02036334996