

## Appendix

### Descriptions of the personal information we process, why, where we source it, who receives it and how long we keep it

*(where NTA and TII are identified as data recipients, this is generally where they are entitled to the return of personal information on Luas customers at the end of the contract)*

What personal information we collect and use	Why we collect and use the personal information	Legal basis for collection and use	Where we obtain the personal information	Who receives the personal information from us	How long we keep the personal information for
<p>Data relating to customers of Luas Services and (more limited information about) Park+Ride services, including:</p> <ul style="list-style-type: none"> <li>• Customer identification details obtained for the purposes of ID and/or travel cards (Luas 7-day and 30-day tickets or group tickets), including photographs. This includes information obtained from companies/businesses which provide details (including photos) of their employees for the purpose of availing of TaxSaver discounted tickets.</li> <li>• Customer payment information through use of our ticketing system and regarding payments for Luas fares (including payment of standard fare notices) and for Park + Ride services. (Park+Ride services</li> </ul>	<p>To operate the Luas Services (including the 7-day and 30-day Luas ticket services, group ticket services and the TaxSaver service) and fulfil our contracts with Luas Customers</p> <p>To obtain correct fare payments and deal with fare evasion and to obtain payment for unpaid fares.</p>	<p>To fulfil our contractual obligations to Luas customers.</p> <p>To fulfil our contractual and legal obligations under our operating contract with NTA and TII.</p> <p>The Luas Bye-Laws, which we are responsible for implementing.</p>	<p>Customers and (in relation to following up on fare payments) our Revenue Protection Officers.</p>	<ol style="list-style-type: none"> <li>1. NTA and TII.</li> <li>2. Our ticketing system (and related software) suppliers has access to customer data in relation to our ticketing system in the context of providing support, maintenance and payment services in relation to the ticketing system.</li> <li>3. Our payment services providers Realex and its related service providers process customer online payment data; Scheidt &amp; Bachman, TNS, Payware &amp; Sage process customer card payment data.</li> <li>4. APCOA PARKING (operators of the Park+Ride service) receives payments from us regarding customer payments</li> </ol>	<p>Luas tickets: 4 months on live system; data deleted within one year of being transferred onto the archive system).</p> <p>TaxSaver: employers: active customers for as long as remain active; inactive customers (including of employees who were registered): deleted from live system and then kept in archive for two years).</p> <p>Standard Fare Notices:</p> <ul style="list-style-type: none"> <li>• For paid fines and related Standard Fare Notice information: 2 years.</li> <li>• For unpaid fines and related Standard Fare Notice information: for as long as required to obtain payment + 7 years.</li> </ul>

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<p>are provided by a separate company, APCOA PARKING, but users can make payment for their parking using Luas ticket machines, and we have access to the APCOA PARKING system.)</p> <p><b>Note:</b> If customers apply for and obtain Leap cards or Student Leap cards directly through retail outlets or from <a href="http://www.leapcard.ie">www.leapcard.ie</a> or <a href="http://www.studentleapcard.ie">www.studentleapcard.ie</a>; or if Park+Ride customers register directly with the Park+Ride service, then we do not obtain this information from the providers of these services. They are separate data controllers to us.</p>				<p>made at Luas ticketing machines.</p>	
<p>Contact details for subscribing Luas customers, including email address and mobile number.</p> <p>This includes personal information provided by individuals who register for an account on <a href="http://www.luas.ie">www.luas.ie</a> to be updated with offers</p>	<p>To market Luas Services to subscribers.</p>	<p>Consent (where the person is not an existing customer and has chosen to positively opt-in to receive marketing communications).</p> <p>“Soft opt-in” (legitimate interests) as permitted under the ePrivacy Regulations 2011, where the person is an existing</p>	<p>The individuals to whom we marketing, including our customers.</p>	<ol style="list-style-type: none"> <li>1. NTA and TII.</li> <li>2. Salesforce, which assists us in managing our customer information.</li> <li>3. Poppulo, which assists us in sending e-zines to subscribing Luas customers</li> </ol>	<p>For as long as the person remains subscribed to the service.</p> <p>For unsubscribers: customers via unsubscribe option at the bottom of email (through Poppulo), their contact details are removed from our contact list immediately.</p>

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and information (“Sign up for Info & Promos”).		customer or we are sending B2B marketing communications.			For customers who notify that they wish to unsubscribe from email alerts via <a href="mailto:info@luas.ie">info@luas.ie</a> (through Salesforce): within 30 days (removal is manual).
Data relating to customer feedback, queries and customer complaints received via our Customer Call Centre, via email, as communicated to our staff, via customer feedback forums, customer satisfaction surveys, from Luas social media accounts (Facebook and Twitter) and from other communications from customers. This data includes customer names and contact details and details of the incident or issue experienced by the customer.	<p>To deal with customer complaints and queries and to correct and/or improve Luas Services;</p> <p>To take action in relation to incidents (e.g. anti-social behaviour or criminal behaviour) on the Luas or at Luas stops, including if the customer is required to provide evidence as part of the follow-up. This can include legal action and/or reporting to the Gardai.</p>	<p>To fulfil our contractual and legal obligations under our operating contract with NTA and TII.</p> <p>The Luas Bye-Laws, which we are responsible for implementing (in the context of complaints that relate to breaches of the Bye-Laws).</p> <p>Our legitimate interests in dealing with and resolving complaints, in correcting and/or improving Luas Services and in protecting our rights and business.</p> <p>Legal obligations in the context of crime reporting and assistance to the Gardai.</p>	<p>Customers (directly or via information relayed to our contractors.</p> <p>Our CCTV system (if a reported incident needs to be verified).</p>	<ol style="list-style-type: none"> <li>1. NTA and TII.</li> <li>2. Salesforce, which is the system we use to record the customer feedback, queries and complaints and the actions taken.</li> <li>3. Our CCTV service provider, CCTV Ireland, to assist us in converting the CCTV camera footage to a viewable format.</li> <li>4. The Gardai, to the extent that any customer communication involves the reporting of a crime.</li> </ol> <p>(To the extent that customer information is relayed by those customers via our Luas social media accounts (Facebook and Twitter), note that Facebook and Twitter are also data controllers in relation to</p>	<ul style="list-style-type: none"> <li>• Recordings of calls are kept for 28 days, then archived for 3 years.</li> <li>• Staff notebooks which are used to keep notes about the calls are kept for 6 months in live files are then archived for one year.</li> <li>• Postal queries: the letter is held in live files for 4 months, and then archived for one year.</li> <li>• For queries and complaints received via our websites and by email: we keep for one month and then we delete.</li> <li>• If any queries or complaints are escalated for investigation and action, details about the complaint or</li> </ul>

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				the personal data processed by them on these accounts.)	query (and related personal information) is kept for as long as takes to resolve issue/incident and (if applicable) deal with legal claims or legal proceedings.
<p>Information about users of the websites <a href="http://www.luas.ie">www.luas.ie</a> and <a href="http://www.transdevireland.ie">www.transdevireland.ie</a> and of the Luas App, including where users/customers or their employers register for services directly provided on the <a href="http://www.luas.ie">www.luas.ie</a> website (e.g. the TaxSaver service). <b>Note:</b> the Leap card websites (<a href="http://www.leapcard.ie">www.leapcard.ie</a> and <a href="http://www.studentleapcard.ie">www.studentleapcard.ie</a> and the Park+Ride website are independent of Transdev Ireland and are operated by the National Transport Authority and by APCOA PARKING.</p> <p>In relation to the websites at <a href="http://www.luas.ie">www.luas.ie</a> and <a href="http://www.transdevireland.ie">www.transdevireland.ie</a>, we use cookies to obtain information on the browsing habits of users of our website (being internet log information and visitor behaviour patterns).</p>	<p>To better understand what users/customers are interested in with regard to Luas Services, and to improve our website and the information and services provided on it.</p>	<p>Customer consent (based on the cookie notice provided on the homepage of our website).</p> <p>Our legitimate interests in understanding the interests and requirements of users of our website, so that we can improve the website and the services provided on it.</p>	<p>Customers.</p>	<p>1. NTA and TII.</p>	<p>No longer than 2 years.</p>

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Please see our Cookie Notice on our website homepage for more information <a href="#">link</a> .					
For Luas App customers that use the 'Report' feature: location data, report form data, session ID.	<p>To enable accurate identification, addressing and tracking in real time:</p> <ul style="list-style-type: none"> <li>• antisocial behaviour on the Luas and/or at Luas stops</li> <li>• damage to Luas property.</li> </ul> <p>To optimise Luas app features and enhance the overall user experience.</p> <p>To differentiate between Luas app users, when more than one user is drafting a report via the Luas App Report feature</p>	<p>To fulfil our contractual and legal obligations under our operating contract with NTA and TII.</p> <p>The Luas Bye-Laws, which we are responsible for implementing.</p> <p>To provide and improve Luas App features. For instance, to identify the Luas tram service that the user is travelling on and populate corresponding Luas tram details into the Report form.</p>	<p>Location data: from the Luas App customers through in-app, opt-in consent.</p> <p>Report form data: Luas app customer</p> <p>Session ID: from Luas App</p>	<p>NTA and TII via the Luas Service Delivery Application.</p> <p>Our service providers, Dovetail Technologies Ltd, and Transit9</p>	60 days
CCTV footage, captured at Luas stops and on Luas trams, and at our office premises.	For security purposes, and to enable us to investigate incidents (e.g. accidents, anti-social behaviour, property damage and/or personal injuries).	<p>To fulfil our contractual and legal obligations under our operating contract with NTA and TII.</p> <p>The Luas Bye-Laws, which we are responsible for implementing (in the context of complaints that relate to breaches of the Bye-Laws).</p> <p>Our legitimate interests in investigate incidents (e.g. accidents, anti-social</p>	From the CCTV footage and recordings.	<ol style="list-style-type: none"> <li>1. Salesforce, which is the system we use to record the customer feedback, queries and complaints and the actions taken.</li> <li>2. Transit9, via the system provided by them to assist in recording incidents.</li> <li>3. Our CCTV service provider, CCTV Ireland, to assist us in</li> </ol>	<ul style="list-style-type: none"> <li>• CCTV footage that does not reveal any incident which is required to be investigated is deleted within 28 days.</li> <li>• CCTV footage that reveals incidents (including health &amp; safety-related incidents or incidents that could result in</li> </ul>

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		<p>behaviour, property damage and/or personal injuries) and in protecting our rights and business.</p> <p>Legal obligations in the context of crime reporting and assistance to the Gardai.</p>		<p>converting the CCTV camera footage to a viewable format.</p> <ol style="list-style-type: none"> <li>4. Safra SA, Masteris and Naudet to assist us in investigating property damages.</li> <li>5. Our solicitors, insurers and claims handlers: Corrigan &amp; Corrigan, Chubb and Aon Claims Management, to investigate property damage and personal injury claims.</li> <li>6. The Gardai, to the extent that any customer communication involves the reporting of a crime.</li> </ol>	<p>civil or criminal proceedings) is retained for 10 years (in compliance with health &amp; safety legislation) or for as long as required to resolve the legal claim, whichever period is longer.</p>
<p>For texters to the Luas Text Service, the texter's mobile phone number and the text they sent.</p> <p>When we receive a text to the Luas Text Service, we may also check the CCTV footage on the tram and/or at the tram stop for the time of the reported incident, and this footage may include footage of the texter to the Luas Text</p>	<p>To enable us to identify, address, and track anti-social behaviour on the Luas or at Luas stops and/or to identify, address, and track damage to Luas property in real time.</p>	<p>For the sending to us of the text and related mobile number, this is based on the texter's consent.</p> <p>Our further processing of the information is based on our legitimate interests (see Purpose(s) of Processing in this Schedule).</p>	<p>The texter + our own CCTV footage.</p> <p>(Note that our CCTV footage may be processed on our behalf in certain limited circumstances by CCTV Ireland.)</p>	<ol style="list-style-type: none"> <li>1. NTA and TII.</li> <li>2. Our text service provider, Neon Communication Solutions and Transit9, to assist us in operating the text service.</li> <li>3. Our CCTV service provider, CCTV Ireland, to assist us in converting the CCTV</li> </ol>	<p>Texts received are deleted within 60 days.</p>

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Service and it may identify them.				<p>camera footage to a viewable format.</p> <p>4. Depending on the nature of the incident, we may be required to pass the texter's information to the Gardaí, particularly if the Gardaí are investigating criminal activity on the Luas (or at Luas stops) and the texter is a witness to the commission of a crime.</p>	
Data captured by the Luas Service Delivery Application (system that we use to record the day-to-day running of Luas services and incidents), which can include personal information about customers if there is an incident.	<p>To operate the Luas Services.</p> <p>For security purposes, and to enable us to investigate incidents (e.g. accidents, anti-social behaviour, property damage and/or personal injuries).</p>	<p>To fulfil our contractual and legal obligations under our operating contract with NTA and TII.</p> <p>The Luas Bye-Laws, which we are responsible for implementing (in the context of complaints that relate to breaches of the Bye-Laws).</p> <p>Our legitimate interests in investigate incidents (e.g. accidents, anti-social behaviour, property damage and/or personal injuries) and in protecting our rights and business.</p> <p>Legal obligations in the context of crime reporting</p>	From employees, sub-contractors and customers who report to us.	<ol style="list-style-type: none"> <li>1. NTA and TII.</li> <li>2. Transit9, our application provider of the Luas Service Delivery Application.</li> <li>3. Our CCTV service provider, CCTV Ireland, to assist us in converting the CCTV camera footage to a viewable format if relevant to corroborating an incident recorded on the central control room system.</li> <li>4. The Gardaí, to the extent that any customer</li> </ol>	Definitive retention periods are not finalised, but we hold the data for at least 10 years (in accordance with health & safety obligations) or if the personal information is required for the purposes of legal claims or legal proceedings, for as long as required to resolve those legal claims or proceedings, whichever period is longer.

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		and assistance to the Gardai.		communication involves the reporting of a crime.	
Lost property: name and contact details for individuals who contact our Lost Property Section; personal information contained in lost property handed in to us or discovered at Luas stops or on trams. (This can include ID cards or bank cards.)	To enable us to track and return lost property.	To fulfil our contractual and legal obligations under our operating contract with NTA and TII.  Our legitimate interests in operating our business: it is right to try to assist customers in obtaining their lost property.	From customers who contact us to seek their lost property.  From banks or other sources which we contact (depending on the contents of the lost property) to enable us to track down the owner. (Note we return lost bank cards to the relevant banks.)	1. NTA and TII.	We keep physical objects for 46 weeks.  We keep personal contact information in relation to lost property for one year.
Name, contact details, claim information and payment details relating to customer who seek refunds.	To enable us to process refunds.	To fulfil our contractual obligations to Luas customers.  To fulfil our contractual and legal obligations under our operating contract with NTA and TII.	From customers seeking the refunds.	1. Realex (our payment processing service provider), for refunds to credit/ debit cards.  2. NTA and TII, including Leap (NTA/TII), for refunds to Leap cards.  3. RW Pierce, for refunds by cheque.	We keep refund file (containing the claimant's personal information) for 4 months on our live files and then in archive files for one year.  The refund amount (which does not contain any personal information) is held by our Account Department for the current year plus 5 years.
Anonymised Data Collection trial: Mobile Access Control (MAC) address, Log Data, Opposed MAC address,	To enable us to better understand how Luas customers move through the Luas network allowing us to improve the Luas	Legitimate interest of the controller, which consists of testing a device for measuring the flow of passengers by developing	From customers by detecting passively emitted signals (probe requests) of electronic devices using Wi-Fi	1. Flowly SAS (data collection service provider) for Anonymised Data Collection trial by	<ul style="list-style-type: none"> <li>Mobile Access Control (MAC) address is retained for 3 hours.</li> </ul>



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<p>Cookies, IP address, Data relating to customer queries and opposition requests received via email.</p>	<p>service and meet the growing needs of the Luas customers.</p>	<p>aggregated and anonymous statistics to optimize public transport services.</p>	<p>sensors installed on trams.</p>	<p>providing technology and assisting us in processing collected data.</p> <p>2. OVH, for storage of collected data in a secure dedicated data centre.</p>	<ul style="list-style-type: none"> <li>• We keep Log Data for 24 hours.</li> <li>• Opposed MAC address is retained for the duration of the trial.</li> <li>• Cookies on a dedicated to the trial website are kept for the duration of the session.</li> <li>• IP address allowing Opposed MAC address execution is retained for 3 months.</li> <li>• Data relating to customer queries and opposition requests received via email is kept for 12 months.</li> </ul>