

# Privacy Statement Mobility Invest Group

Your privacy is important to us. This privacy statement explains how we process personal data collected from you or provided by you. We strongly advise you to read it carefully.

Our privacy policy is subject to change due to amendments to the law and the ever-changing nature of technology. We will inform you that our privacy statement has been updated whenever a change significantly impacts the parties involved. Any changes with minor or no impact on the parties involved will not be reported. The most recent version of our Privacy Statement will apply and can always be found on [our website](#).

## Table of contents

Definitions of personal data categories .....	2
Who are we? .....	4
Which data is collected and processed, and why?.....	5
Visiting our websites .....	5
Access to our services .....	5
Using our services.....	6
Using the app or webapplication .....	6
Using the personal mobility card .....	11
Shared cards .....	13
Billing .....	13
Customer services .....	15
NSBC administration.....	15
Travel data analysis .....	15
Research into travel and payment behaviour .....	16
Improving our services .....	16
Safety.....	16
Who do we share your details with?.....	16
Links to third party websites .....	17
How do we protect your data? .....	18
How to exercise your rights.....	18
Questions or complaints?.....	19

## Definitions of personal data categories

This privacy statement will group personal data for convenience and readability. To ensure it will remain clear to you what we mean exactly, you will find an overview below of these groups, their meaning and which data is part of which group:

Category personal data	Explanation	Contains
Customer identification numbers	A row of numbers or number-letter combinations is used by MIG internally or by third parties to identify the end user. For pseudonymisation purposes.	Ownership ID (MIG internally)
		Entity ID (MIG internally)
		Customer number (third parties)
		Employee number (employer)
		Transponder code (third parties)
		UUID
Engraved ID	The card number as printed on the card.	Card number
Chip ID	Card number as saved in the card's chip.	Card number
Car details	Details referring to the car and its use.	Licence plate
		Brand and type
		CO2 specification
		Information on driver behaviour including speed, braking force, etc
CICO details	Check-in, check-out data as supplied by public transport providers.	Check-in and check-out stop
		Check-in and check-out date
		Check-in and check-out time
		Transport provider
		Transaction costs
		Card balance
Location details	Data referring to the location of the party involved.	Start and end location trip
		Parking location
GPS data	Data used to enable GPS-tracking.	Total distance in kilometres
		Type of transport
		Start date and start time
		Modality (walking, car, bike, etc.)
		Purpose (to work, home, etc.)
		Average speed
		Duration
		Role user (passenger/driver/not applicable)

Contact details	Contact details as known at MIG.	(business) Email address
		(business) Telephone number
		Home address
		Work address
Data electronic identification	Data used to identify the end user electronically	IP address
Transaction date	All data related to travel transactions: CICO data, location details and GPS data.	CICO data Details location GPS data
Administrative data	Data your employer maintains for administrative purposes.	Project code
		Budget group
		Cost center
		Department

## Who are we?

Mobility Invest Group (MIG) has been active in the world of mobility for more than ten years. It operates from different divisions in the mobility sector, including Mobiliteitsfabriek, Reisbalans en Dumoco. You will probably not work with MIG directly; we usually process your personal data via one of our divisions. In this privacy statement, we will explain how we do this.

MIG, located at the Smallepad 32-34 3811 MG in Amersfoort, is ultimately responsible for processing personal data as described in this privacy statement. Each of its divisions is responsible for processing personal data. If you have any questions about this privacy statement or how MIG or any of its divisions handle your personal data, please do not hesitate to contact us:

<b>Reisbalans BV</b>	<b>Mobiliteitsfabriek BV</b>	<b>MAAS Development BV</b>	<b>Mobility Services BV</b>
<a href="http://reisbalans.nl">reisbalans.nl</a>	<a href="http://www.mobiliteitsfabriek.nl">www.mobiliteitsfabriek.nl</a>		
Smallepad 32-34	Smallepad 32-34	Smallepad 32-34	Smallepad 32-34
3811 MG	3811 MG	3811 MG	3811 MG
Amersfoort	Amersfoort	Amersfoort	Amersfoort
<a href="mailto:info@reisbalans.nl">info@reisbalans.nl</a>	<a href="mailto:info@mobiliteitsfabriek.nl">info@mobiliteitsfabriek.nl</a>		
+31 88 934 3456	+31 88 934 34 34	+31 88 934 34 34	+31 88 934 34 34

Privacy Officer MIG: Dana Balog-Bolink ([privacy@mobiliteitsfabriek.nl](mailto:privacy@mobiliteitsfabriek.nl))

<b>Tripkey BV</b>	<b>Stichting Dumoco</b>	<b>RC-BKA</b>	<b>WijMobiel</b>	<b>Vecore</b>
<a href="http://www.tripkey.nl">www.tripkey.nl</a>	<a href="http://www.dumoco.nl">www.dumoco.nl</a>	<a href="http://www.businesstravelcard.nl">www.businesstravelcard.nl</a>	<a href="http://Wijmobiel.nl">Wijmobiel.nl</a>	<a href="http://Vecore.nl">Vecore.nl</a>
Smallepad 32-34	Smallepad 32-34	Smallepad 32-34	Smallepad 32-34	Zonneoordlaan 17
3811 MG	3811 MG	3811 MG	3811 MG	6718 TK
Amersfoort	Amersfoort	Amersfoort	Amersfoort	Ede
<a href="mailto:servicedesk@tripkey.nl">servicedesk@tripkey.nl</a>	<a href="mailto:klantenservice@dumoco.nl">klantenservice@dumoco.nl</a>			<a href="mailto:sales@vecore.nl">sales@vecore.nl</a>
+31 88 934 34 43	+31 88 – 934 34 06	+31 30 – 711 57 17	+31 88 - 934 34 01	+31 88 57505 00

Privacy Officer MIG: Dana Balog-Bolink ([privacy@mobiliteitsfabriek.nl](mailto:privacy@mobiliteitsfabriek.nl))

## Which data is collected and processed, and why?

We process the information you provide, for example, by registering on our website or contacting our customer service department. We also process personal data received by third parties and share your personal data with them. For example, data received from or forwarded to your employer or suppliers of mobility services. Which personal data is obtained and processed, for which purpose and on which basis, strongly depends on which service you use from us. Below, we will explain this as clearly as possible.

### Visiting our websites

We use cookies and similar technologies on our websites, and cookies are also placed by third parties. Our cookie policy informs you of the use of cookies.

### Access to our services

There are different ways to gain access to our services:

- In some situations, we send you an invitation on behalf of a third party (usually your employer), including a unique link to register to enable you to create an account. You hereby enter into an agreement with one of our divisions. To send out this invitation, this third party will send us *your (business) email address, first name and last name*. This third party can supply us with a more extensive set of personal data. For example, your *home address*, when a mobility card needs to be delivered to your home, or your *business address* to reimburse commuting expenses. The same set of data provided to us can be requested from this third party (usually your employer) and will be visible in your web application after registration to check and confirm expense claims. This data can be requested from us [at all times](#).  
*This third party is the data controller (“controller”), which processes this data until it is received by one of our divisions.*
- In other cases, you will register directly to access our services, usually via one of our websites. In these cases, we will ask for *your name, address and contact details*. *In this case, the division you are registering with is the controller for this data.*
- You can also log in via Single Sign On. In that case, we will receive *unique identification data* from you. The data involved depends on the implementation of the party providing Single Sign On. This could be, *for example, an identification code or an email address*.

In all cases, the data is processed based on the legal basis of the **performance of a contract** under the GDPR. We will retain this data for a maximum of 2 FINANCIAL YEARS.

### Using our services

After you have gained access to our services, you will start using one or more of our services. The personal data we process strongly depends on the services you are using. If you use our services via a third party (usually your employer), this third party will decide which services are available.

Below, you will find an overview of our services and information on the processing of your personal data linked to these services by clicking on the relevant service.

- [Using the app or web application](#)
  - [Journey registration](#)
  - [CO2 registration](#)
  - [Reimbursement for travel expenses](#)
  - [Allowance for working from home](#)
  - [Reporting to third parties](#)
  - [Shared car](#)
  - [Micromobility](#)
  - [Street parking](#)
  - [Taxi](#)
  - [Electric charging](#)
  - [Submitting expenses](#)

- [Route planner](#)
  - [E-tickets](#)
- [Using the mobility card](#)
  - [Off-street parking](#)
  - [P+R parking](#)
  - [OV-fiets](#)
  - [Business subscription public transport](#)
  - [Refuelling](#)
  - [Requesting reimbursement for missed check out](#)
- [Shared cards](#)
- [Billing](#)
- [Customer service department](#)
- [NSBC administration](#)
- [Travel data analysis](#)
- [Research into travel and payment behaviour](#)

#### Use the app or web application

The MIG offers different mobile apps, often linked to a web application. Which data we collect for your account in the app or web application has already been explained in [Access to our services](#).

When using one of our apps or web applications, we use *contact details, travel history, card details, travel balance, transaction details, location details, device details and operating system (Android, iOS, etc.) of your phone* known to us in the app or web application.

After you log in into the app, we exchange details between the app and the web application. The app enables us to provide travel advice and send push messages on validating journeys, and you can get in touch with our customer service department. To use the available services offered via our apps and web applications, (additional) personal data is shared from the app or web application with third parties. These parties also provide data on you, which we share via the app or web application. The data shared depends on the service(s) used. You will find a breakdown below:

### *Journey registration*

The app and web application enable you to register your journeys and gain insight into your travel history. Registering journeys can be done manually or via GPS registration.

#### **Manual**

You enter the *starting point and destination of your journey*.

We then process your details based on the legal basis **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### **GPS registration**

GPS registration is only available in the app if the app offers this functionality, and can be used in two different manners:

##### *Automatically per journey*

Switch on *location* manually *per journey*.

##### *Automatically*

Switch on *location* in the app *permanently*. Automatic journey registration automatically registers your journeys, so you won't have to enter them manually. It uses your location in the background when the app is not in use.

In GPS registration, this data is processed based on the legal basis of **performance** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS, except the GPS COORDINATES. These will be REMOVED AFTER THE JOURNEY HAS BEEN CONFIRMED.

If you use GPS journey registration, registration will be based on your mobile device's location (telephone signal, Wifi and/or GPS). The location is automatically switched off in the app. You will be asked for permission when asked to switch on your location. You can switch your location on and off at any time.

To make it easier to register your journeys (manually or via GPS), you can enter your *home address, business address, licence plates of the cars you use, and favourite addresses*. You won't have to enter those details; they are for your convenience.

We will process these details based on the legal basis of **performance** under the GDPR. We will retain this data for a MAXIMUM of 67 DAYS AFTER YOUR ACCOUNT HAS BEEN TERMINATED.

### *CO2 registration*

Next to the distance travelled and the costs of your journey, we also register the CO2 emission of each journey. This is done based on this list of [emission factors](#) or - if you informed us of your licence plate - based on the data known at the Netherlands Vehicle Authority ('RDW').

These details are based on the legal basis **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.



### *Reimbursement of travel expenses*

After we have given you access to our services, as requested by a third party (usually your employer), we will usually use your transaction data to calculate the reimbursement of your travel expenses. In most cases, the expenses will be set off against your salary. To do this and to be able to substantiate this, we will share your data with the third party (usually your employer) who has given you access to our services. This includes *travel history, card details, balance, transaction data and location details*. We will only share details relevant to this third party. For example, if your employer is the third party involved, we only share data you marked as business-related or related to commuting to work.

In that case, this data will be processed based on the legal basis of the **performance of a contract** under the GDPR. We are obliged by law to retain this data for 7 YEARS.

### *Allowance for working from home*

It is also possible to register for an allowance to work from home in your app or web application. We only register *time* and *remuneration*.

We will process this data based on the legal basis **performance of a contract** under the GDPR. We are obliged by law to retain this data for 7 YEARS.

### *Reports for the employer*

After we have given you access to our services, as requested by a third party (usually your employer), we might provide specific reporting to third parties upon request, such as CO2 reporting or reports on lease mileage. This enables us to process the following data: *unique identification number, engraved ID, chip ID, car details, CICO data, location data, GPS data, contact details, transaction data, and administrative data*. We obviously do this aggregated and anonymously whenever possible.

We process this data based on the legal basis **determined by the controller** under the GDPR, as we carry out these types of reports on behalf of a third party (often your employer).

It is important to note that MIG acts as a *data processor* (“processor”) for this processing activity under the GDPR. The third party (usually your employer) acts as a controller, and the privacy terms and conditions of this third party (usually your employer) apply to processing this data. Non-anonymised data will be retained for a **MAXIMUM of 2 FINANCIAL YEARS**.

### *Shared transport via MIG*

Our apps and web applications enable you to use our shared cars and shared bikes. Your personal data is shared with third parties to activate and offer this service to you.

These parties are controllers under the GDPR, and their privacy statements apply. Our [overview of recipients of personal data](#) provides an overview of these parties, their privacy statements, and which personal data we send and receive. More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the **performance of a contract** under the GDPR. We will retain this data for a **MAXIMUM of 2 FINANCIAL YEARS**.

### *Shared transport via third parties*

Our apps and web applications enable you to activate and manage our micromobility service. This service offers access to smaller means of transport, including shared bikes and scooters. The services of different third parties are at your disposal. To facilitate and offer these services to you,

we share personal data with these third parties. These third parties may, in turn, share your personal data with other service providers. This occurs when you utilise the services of MyWheels, Check, or SIXT, which are offered to you through Shuttel. Information regarding the data we share with Shuttel for this purpose can be found [here](#).

These parties are controllers under the GDPR, and their privacy statements apply. Our [overview of recipients of personal data](#) provides an overview of these parties, their privacy statements, and which personal data we send and receive. More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### *Car rental*

Our apps and web applications enable you to rent cars. Your personal data is shared with third parties to activate and offer this service to you.

These parties are controllers under the GDPR, and their privacy statements apply. Our [overview of recipients of personal data](#) provides an overview of these parties, their privacy statements, and which personal data we send and receive. More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### *Street parking*

Our apps and web applications enable you to activate and manage our Street parking service. This service facilitates parking in addition to P+R and off-street parking. You have the services of different third parties at your disposal. Your personal data is shared with third parties to activate and offer this service to you.

These parties are controllers under the GDPR, and their privacy statements apply. Our [overview of recipients of personal data](#) provides an overview of these parties, their privacy statements, and which personal data we send and receive. More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### *Taxi*

Our apps and web applications enable you to activate and manage our Taxi service. This service allows you to book a taxi. The services of different third parties are at your disposal. To activate and offer this service to you, your personal data is shared with third parties.

These parties are controllers under the GDPR, and their privacy statements apply. Our [overview of recipients of personal data](#) provides an overview of these parties, their privacy statements, and which personal data we send and receive. More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the **performance of a contract**

under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### *Electric charging*

Our apps and web applications enable you to activate and manage our Electric charging service. This will give you access to electric charging stations. The services of different third parties are at your disposal. To activate and offer this service to you, your personal data is shared with third parties.

These parties are controllers under the GDPR, and their privacy statements apply. Our [overview of recipients of personal data](#) provides an overview of these parties, their privacy statements, and which personal data we send and receive. More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### *Submitting expenses*

Our apps and web applications also offer the opportunity to claim other costs, including lunch or parking. This can be done by taking a picture or by scanning the receipt.

When submitting expenses like this, we process the *personal data of the expense claims and the proof of claim, such as a receipt*.

In all cases, the data is processed based on the legal basis of the **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### *Route planner*

The planner enables you to plan a journey using different means of transport. This means the planner will advise you on how to travel, which means of transportation to use, and which transport providers to use. This also includes own transport, including a bike, motorbike or car, and walking. And also providers of [shared mobility via MIG](#) and [shared mobility via third parties](#).

There are two ways of planning your journey:

- From location A to location B;
- Near a specific location.

#### **From location A to location B**

Using the A-B planner, you will provide *two locations*, date and time. The multi-modal route planner will provide all travel options between these two locations.

#### **Near a specific location**

The "nearby" functionality displays options for current public transport and shared mobility on a map, available at a *specific location*.

No personal data will be exchanged with third parties when using the planner. Locations used will only be shared anonymously with the third party providing travel advice. When the travel recommendations are retrieved, they are linked to you as a user within our systems and displayed to you.

Requested TRAVEL ADVICE will NOT BE SAVED.

#### *E-tickets*

You can also purchase e-tickets for (international) train journeys. Third-party services are available. Your personal data is shared with third parties to activate and offer this service to you.

These parties are controllers under the GDPR, and their privacy statements apply. Our [overview](#)

[of recipients of personal data](#) provides an overview of these parties, their privacy statements, and which personal data we send and receive. More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### Using the personal mobility card

Once you have created an account at one of our divisions, you can apply for a mobility card in this account. This will be a business OV-chipkaart, giving you access to all public transport in the Netherlands. A licence is required to issue an OV-chipkaart. Therefore, your request for an OV-chipkaart will go through RC-BKA, MIG's division, which owns the licence. On behalf of the RC-BKA, we will provide our card manufacturer, Translink Systems (Translink) with your **initials, last name, address, date of birth** and - only when necessary – your **passport photo**.

Translink Systems is a processor under the GDPR for personalising an OV-chipkaart. Regarding processing transaction details of transactions made with an OV-chipkaart, Translink is the controller under the GDPR. Translink's privacy statement is relevant to this area of the processing process. More information on which personal data we send and receive from Translink and a link to our privacy statement can be found in our [overview of recipients of personal data](#). More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

We will process this data based on the legal basis **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### Off-street parking

Off-street parking is one of the services available in our apps and web applications and is linked to your mobility card. This service enables you to access off-street parking using your mobility card. Your personal data is shared with third parties to activate and offer this service to you.

These parties are controllers under the GDPR, and their privacy statements apply. Our [overview of recipients of personal data](#) provides an overview of these parties, their privacy statements, and which personal data we send and receive. More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### P+R parking

P+R parking is a service that can be requested in our apps and web applications and is linked to your mobility card. This service enables you to access P+R parking using your mobility card. Your personal data is shared with third parties to activate and offer this service to you.

These parties are controllers under the GDPR, and their privacy statements apply. Our [overview of recipients of personal data](#) provides an overview of these parties, their privacy statements, and which personal data we send and receive. More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the **performance of a contract**

under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### OV-fiets

OV-fiets is one of the services which can be requested in our apps and web applications and is linked to your mobility card. This service enables you to use your mobility card to use an OV-fiets or to park your own bike in one of the secure storage facilities or self-service storage facilities located at different train stations. To offer this service, we share the *card number of your OV-chipkaart (EngravedID)* and the *ChipID* with OV-fiets.

OV-fiets is the controller under the GDPR, and the privacy statements of these parties are applicable. Our [overview of recipients of personal data](#) provides an overview of these parties, their privacy statements, and which personal data we send and receive. More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### Business subscription public transport

You might receive a business OV-chipkaart with a business subscription for public transport. Therefore, we must share your personal details with the relevant transport provider, including your *name, address, date of birth* and *passport photo*.

This transport provider is controller under the GDPR, and its privacy statement is therefore applicable. An overview of these parties, their privacy statements and which personal data we send and receive can be found in our [overview of recipients of personal data](#). More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the performance of a contract under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### Refuelling

Your mobility card can also be used as a fuel card. You have the services of different third parties at your disposal. Your personal data is shared with third parties to activate and offer this service to you.

These parties are controllers under the GDPR, and their privacy statements apply. Our [overview of recipients of personal data](#) provides an overview of these parties, their privacy statements, and which personal data we send and receive. More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### Requesting reimbursement for missed check-out

You might forget to check out, or your check out isn't registered correctly at the transport provider. If instructed by your employer, we will automatically try to re-obtain a refund for your journey.

We share your *OV-chipkaart number, the expiry date of your card, the date of the incomplete journey, the check-in and check-out stop, the transport provider* and *the amount claimed* with [uitcheckgemist.nl](https://www.uitcheckgemist.nl), a service provided by shared public transport providers in the Netherlands. We

use software developed by a third party for this. This third party will also receive the personal data mentioned above.

We will process this data based on the legal basis **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS. The third party we work with will remove your data once we have been informed of the outcome of the request. Check [uitcheckgemist.nl's privacy statement](#) to find out how they handle your data.

#### Shared cards

A shared card is an anonymous OV-chipkaart linked to an organisation. It only contains a card number and period of validity; it does not contain any personal data. Therefore, the services we can offer via a shared card are limited.

The organisation purchasing the shared cards is responsible for administering and linking the card number to the relevant user; MIG is not involved in this process. If the organisation uses the web application to register for a specified period, MIG will be informed who uses the shared card for that period. This data will then be added to the invoice to inform the employer.

MIG is also aware of which card numbers are used by which organisation and will receive *transaction details, including check-in and check-out date, location and time*, as with normal usage of our services. The MIG will share these details based on the card number with the shared card administrator.

In this case, both MIG and the administrator of the shared cards act as controllers under the GDPR, and the privacy statements of MIG and the administering organisations apply.

MIG only shares the *card number* with third parties and only when necessary. Our [overview of recipients of personal data](#) provides an overview of these parties, their privacy statements, and which personal data we send and receive. More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

In all cases, the data is processed based on the legal basis of the **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### Billing

##### Direct

We might enter into a billing relationship with you. If we bill you directly, we will need personal data, including *name, address and bank account number*.

In this case, we will process your data based on the legal basis **legal obligation** under the GDPR to meet our administrative duties imposed by the tax authorities. We are obliged by law to retain this data for 7 YEARS.

##### Via a third party

After we have given you access to our services, as requested by a third party (usually your employer), we will enter a billing relationship with said third party. In most cases, the tax authorities will impose a duty of administration.

To meet said duty of administration and to substantiate the relevant invoice, we provide this third party with an overview of journeys made by you and confirmed as billable. This overview includes *details for identification*, including *the employee number*, and *information on journeys made, including date and time, travel purpose, and miles travelled*.

We will process this data based on the legal basis **performance of a contract** under the GDPR.

We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

As part of our services to this third party, we will ensure that relevant data, including *transaction data, claimed mileage, and type of transport used*, will remain available to this third party.

Your details will be processed based on **legitimate interest**. The decision made by MIG is based on weighing its commercial interest in keeping this data available to our customers against your interest in not having this data managed by MIG but by your employer. Since there is a legal obligation to maintain records, the data must be retained regardless; it is simply a matter of location in this case. We are obliged by law to retain this data for 7 YEARS.

### **Split billing**

If permitted by your employer, you may also use the mobility services offered through MIG for private purposes. You will confirm transactions for personal purposes in the web application or app as 'Private' travel.

Regarding the settlement of these transactions, two forms are used here: settlement through payroll or a direct settlement between yourself and MIG. In the event of a direct settlement between yourself and MIG, a payment agreement will be concluded between you and MIG. Private usage through a direct billing relationship between you and MIG is made available by your employer but can only be activated by you.

If you wish to use this service, you will grant a direct debit mandate to our payment provider. To that end, the payment provider will process personal data, namely *name, address, residence, IBAN and signature*. You may adjust the bank details you provided in connection with the direct debit mandate anytime.

By using this service, you accept the payment provider's privacy terms and conditions. A link to the privacy statement and the personal data we send and receive can be found in our [overview of recipients of personal data](#). More information on how we deal with these third parties and how we ensure your personal data is handled correctly by these parties can be found [here](#).

If you fail to pay your invoice punctually, MIG may shift the payment obligation to your employer. In such an event, we must share your *email address* and the *total amount outstanding* with your employer.

The basis for processing this data is the legal basis of the **performance of a contract** under the GDPR. We will retain the billing data for a MAXIMUM OF 2 FINANCIAL YEARS OF DATA HISTORY.

### **Settlement through payroll**

MIG also offers third parties (usually employers) the opportunity to settle mobility allowance through payroll. For such purpose, we link the HR or salary administrative software to the one used by this third party. We provide third parties with an overview to substantiate the settlements carried out. This overview includes *information to identify you*, including *employee number*, and *information on journeys made, including date, time, travel purpose, mileage*, etc.

We will process this data based on the legal basis **performance of a contract** under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

### **Customer services**

Customer service is part of the services we provide. You can contact our customer service department through different media. In all cases, we will process personal data to assist you. This usually includes *name, address, (business) email address, telephone number*, and any *other personal data you share with us*.

In all cases, the data is processed based on the legal basis of the performance of a contract under the GDPR. We will retain this data for a MAXIMUM of 1 YEAR.

#### NSBC administration

We can facilitate the administration of organisations offering NS Business Cards (NSBC) to their employees. An NSBC can be requested from us directly; we will order the cards, carry out any changes and terminate the cards if and when required. This means we will gain access to *name, address, passport photo (in case of a subscription), email address, and check-in and check-out data for journeys made using the NSBC.*

We will process this data based on the legal basis performance of a contract under the GDPR. We will retain this data for a MAXIMUM of 2 FINANCIAL YEARS.

#### Travel data analysis

At the request of your employer, we can analyse public transport travel data and specify for which employee a discount for travelling off-peak or a subscription will be cost-effective. We can also analyse the occupancy and efficient usage based on travel data from our own shared cars and bicycles. This enables us to encourage travelling by bike instead of by car for short journeys and by public transport instead of travelling long distances by car.

To do this, we process personal data, including *travel history, type of transport and name and address details.* These reports are aggregated reports and do not include any personal data.

We process this data based on the legal basis **determined by the controller** under the GDPR, as we perform these types of reports on behalf of a third party (often your employer).

It is important to note that MIG acts as a *processor* under the GDPR for processing this data. In this case, the third party (usually your employer) is the controller, and this third party's privacy terms and conditions are applicable. The data will be anonymised AS SOON AS THE REPORT HAS BEEN CREATED.

#### Research into travel and payment behaviour

To optimise the use of our knowledge and experience within the mobility sector, we participate in research into our customers' travel and payment behaviour. We do this as aggregated and anonymously as possible. If this cannot be anonymous, we always ask for your permission.

When you participate in one of our behaviour change projects, we might process your personal data. This could include the following personal details: *name, email address, telephone number, information on journeys made, for example, check-in/check-out data (date, time, location), costs, location details, and type of transport.*

We process this data based on the legal basis of **contract performance** under the GDPR or based on the legal basis **determined by the controller**, as we typically conduct this type of research on behalf of or in collaboration with a third party.

Research for internal use will only be carried out using anonymised data. Non-anonymised data will be retained for a MAXIMUM of 2 FINANCIAL YEARS.

#### Improving our services

We process your personal data to further improve our services and user experience. This is done by analysing your data, for example, when visiting our website or using our app. This includes data such as *IP address, systems data and account details.* We also analyse *travel data* to improve our services.

Your data is processed based on **legitimate interest**.



MIG hereby considers that its commercial interest in improving its services and user experience to provide a higher-quality product outweighs your interest in not providing us with this data. MIG is of the impression that we can only improve our services with this data and that the privacy impact for you of processing this data is minimal.

You can obviously [object](#) to the processing of your data. We will retain this data for a MAXIMUM of 18 MONTHS.

### Safety

To protect your and our data as best as possible, we collect data on how our services are used. Including fraud prevention and detection. For example, *account details, systems data and IP address*.

Your data is processed based on the legitimate interest legal basis. MIG deems it necessary to safeguard its services and applications to such an extent that it justifies a limited infringement on your privacy. MIG believes that the infringement on your privacy remains minimal, as we have implemented a wide range of measures such as encryption, masking, data minimisation, storage limitation, and access restriction to secure the collected data. These data are only accessible to the employees of our organisation who require them and are only based on solid authentication through a complex password and 2FA. We retain this data for a maximum of 120 DAYS.

### Who do we share your data with?

[‘Which data do we collect and process, and why?’](#) describes how we use various third parties to offer our services, optimise the security of our own services, or offer services to your employer. The [overview of recipients of personal data](#) provides more detailed information on which data is linked to which service and which third party. Our main principle of sharing data is that the minimum data set is transmitted securely with parties who are verifiably handling this data correctly. We will share your data in the following situations:

- ❖ We disclose personal data to (the representatives of) the organisation (usually your employer) which has granted you the right to use our services. In case of security incidents or data breaches, we may also share personal data - related to the incident or data breach - with (the representatives of) this organisation.  
Please note that using our services will result in a file containing personal data based on which decisions may be made about using our services by such organisation (or its representatives). For example, the relevant organisation or its representatives may view your travel history, including location, time, and means of transport.
- ❖ We are under the obligation to disclose your personal data if required to do so by law for any reason whatsoever.
- ❖ We will share data with third parties acting as controllers. See [‘Which data do we collect and process, and why?’](#).
- ❖ We may disclose your personal data to processors within the meaning of the GDPR. These are service providers performing work on our instructions. Personal data will only be shared with partners when we deem a partnership with the relevant partner necessary for our business operations, the proper and safe provision of our services, or the development of future services. When we work with partners, we, as the controller, ensure that such service providers carefully and adequately process personal data per the GDPR. This includes the following types of processors:

- hosting parties;
- customer services and communication services;
- accounting software;
- software to measure the performance of our applications;
- data analysis software and services;
- security software to keep our services safe
- IT development software;
- payment providers.

As mentioned in this document, we will not use your personal data for purposes other than those described in this Privacy Statement and will not sell it.

### Links to third party websites

Our service may contain links or refer you to other websites, apps and advertisements from third parties, which may keep information about you. We do not control any such websites or their activities. All data, including personal data that you provide to any such third parties, will be provided directly to and will be subject to the privacy policy of the relevant third party. We will not be responsible for the contents, privacy and security practices, and policy of any third parties we link or refer to. We recommend that you review the privacy and security practices and policies of the relevant third parties before providing them with data. You will find those on the applicable third party's website, or they may be available on request from such third party.

### How do we protect your data?

We have implemented physical, technical, and organisational measures to protect your personal data. We will do our best to maintain the complete reliability, accuracy and completeness of all personal data in our databases and protect our applications' privacy and security. We have, in any event, implemented the following measures:

1. we have implemented physical and technical measures and management procedures designed to prevent unauthorised access, loss or abuse of personal data to the extent possible;
2. sensitive information or personal data, such as account passwords and other payment-related identifiable information, are transmitted in encrypted form;
3. sensitive information (including your password) is stored in encrypted and/or hashed form where possible;
4. we limit internal access to personal data to employees who need such information in the performance of their duties;
5. our employees are bound by a confidentiality clause;
6. our information management systems are set up to prevent employees who are not authorised to view specific information or personal data, in principle, from accessing such information;
7. our servers are set up in a secure environment in data centres. You will only have access to the front end of our servers, and only by logging on with a username and password. You are responsible for the safekeeping of your login credentials;
8. personal data is backed up regularly.

9. We are ISO 27001 certified. This means that an independent body has determined that MIG has organised information security properly. Additionally, MIG regularly tests the safety of its systems through so-called ethical hackers.
10. We demand a similar level of information security from our service providers.

## How to exercise your rights

Of course, the personal data that we use is and will remain your property. Therefore, you have the right to view, adjust, erase or restrict the data we keep about you or transfer to someone else. This can be done via our web applications, apps, and the application form on our service page. Our customer service department can also be of assistance. You may submit the following requests to us:

- ❖ a request for data portability based on the right that you have to transfer personal data to another party;
- ❖ a request for erasure, exercising your right to be 'forgotten';
- ❖ a request for access based on your right to view the personal data that we process about you;
- ❖ a request for rectification and supplementation, giving you the right to correct personal data that we process;
- ❖ a request for restriction of the processing, exercising your right to have fewer personal data processed about you;
- ❖ an objection, exercising your right to object to the data processing.

Our primary obligation upon receiving such a request is to identify the data subject to ensure we do not disclose your personal data to others. When we receive your request through one of our web applications or apps, you are already identified through your username and password. Since this is the least invasive means of identification we can offer, we kindly ask you to submit your request through our web applications or apps.

If this is impossible or you are not using our web applications or apps, we will try to identify you based on the available data.

After successful identification, we will generally process your request within 30 days. If we are unable to do so, we will notify you accordingly.

We would like to inform you that your request may have consequences for using our services.

## Questions or complaints?

You have the right to submit a question or complaint to us about the processing of their personal data. Our contact details can be found at ['Who are we'](#).

For any complaints regarding how we process your personal data or how we handle your complaint concerning the processing of your personal data, you can contact the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) directly at telephone number (088) 18 52 50, or at: <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-indienen-bij-de-ap>.