Privacy Notice

Dated: November 2018

1. Who is responsible for managing my information?

The Belfast Bikes scheme is operated by NSL Limited, whose registered address is at Rutland House 8th Floor, 148 Edmund Street, Birmingham B3 2JR.

In this privacy notice, we refer to ourselves as "Belfast Bikes", "we" or "us". We refer to the Belfast Bikes scheme as "the scheme".

This is our **Privacy Notice** and it explains how we collect, use, share and protect your personal data as well as outlining your rights in relation to it.

We are responsible for the collection and proper management of any personal data you give to us [or which we collect about you automatically when you used this website]. We will keep your personal data secure and use the information you provide consistently with applicable privacy and data protection laws and the terms of this Privacy Notice.

2. What information do we collect?

When you sign up to the scheme, you enter your personal data. This includes your name, contact details and your choice of subscription for the scheme. During the process, we will also ask you for your payment details (payment card). When you sign up to the service you will be allocated a username (Telephone number) and password.

We also collect some information about you automatically when you use the website using server logs and "cookies". For further information about cookies and how we use them please see our Cookie Policy.

3. How do we use your information?

The information you provide is used in several ways, including:

- to enable us to set up, manage and administer your account;
- to enable us to provide services you have requested;
- to answer any questions or customer service queries you raise;
- to identify membership status, identify frequency of journeys and popularity of routes for new stations and efficiency when we evaluate the scheme;
- to tell you about special offers, products and services we think may be of interest to you if you have indicated that you wish to receive such information (see below).
- To improve your experience of our website and help us identify and fix errors

4. On what legal basis will we process your information?

We will always process your personal data on lawful grounds and in particular on the grounds set out below: -

Performance of a Contract/Service

We will use your personal data to allow us to provide you with membership of the scheme as you request. The information we process to do this includes your name, contact details, address and payment details and username.

Any additional information we may need to help meet your specific requirements or answer service queries.

If you do not provide us with the information set out in this paragraph, then we will not be able to set up your membership of the scheme.

Legitimate Interest

We may use your name and contact details to tell you about our services which we think may be of interest to you. You can ask us to stop doing so at any time.

We process your personal data when we produce statistics to help us improve the availability and redistribution of the bikes and to analyse how the scheme is working, for example, by analysing information about the location from which bikes were rented from and returned to.

If we buy or sell any business and/or assets we may disclose your personal data to the prospective buyer or seller of the business and/or assets.

The above are carried out on the basis that they are in our legitimate interests and that your rights as an individual do not override those legitimate interests.

Consent

When you sign up for the scheme on this website, we ask you to indicate whether you wish to receive information and special offers.

You can withdraw your consent at any time.

Legal Obligation

We may also use and disclose your personal data for compliance purposes, to the extent that we are required to do so by law or regulation, by a law enforcement or taxation agency or for the purposes of preventing crime.

5. Who will you share my information with?

In order to provide you with access to the scheme or because doing so is in our legitimate interests we will share your information with:

- credit/debit card companies;
- payment card processing providers;
- NextBike GmbH, with whom we partner to provide the scheme (see our terms and conditions) and who provide customer services support services to us;
- other third parties who we may need to work with to deliver services or fulfil requests on your behalf.

We may also use and disclose your personal data for the purposes of compliance, to any legal or taxation authority, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend our legal rights.

6. How do you manage my information?

We do from time to time appoint third party service providers to carry out some or our obligations, to help us manage efficient systems within the business and to deliver the scheme. We enter into appropriate contracts with these providers to protect your personal data and to ensure compliance with our legal obligations. We do not transfer your personal data outside of the European Economic Area.

7. Updating Your Details?

If you would like to change any of your preferences relating to the way in which we may use your information for direct marketing, you can update your user preferences when you log into your account or send an email to us at belfastbikes@nsl.co.uk or call us on 03433571551.

Alternatively, you can click on the unsubscribe link in any email or follow the instructions within a text message to stop receiving them.

8. How long will we hold your information for?

We have a system of retention periods in place to ensure that your information is only stored whilst it is required for the relevant purposes or to meet legal requirements. Where your information is no longer required, we will ensure it is disposed of or deleted in a secure manner.

If you have any questions in relation to our retention periods please contact us at belfastbikes@nsl.co.uk or call us on 03433571551.

9. Your rights

You have the right to ask us at any time: -

- to confirm whether we hold any of your personal data;
- to send you a copy of any personal data that we hold about you;
- to correct any inaccuracies in your personal data and to add relevant details where the personal data we hold is incomplete;

- to delete (to the extent possible) any of your personal data, where we are required by law to do so:
- to stop or restrict processing your personal data, where we are required by law to do so;
- to let you have a portable copy of the personal data we hold about you, to the extent we are required by law to do so;
- to stop processing any of your personal data that we process based on our legitimate interests; and
- to stop sending you marketing material. However please note that we may continue to send you service related (i.e. non-marketing) communications, such as emails relating to the scheme.

Where we process your personal data on the basis that you have given us your consent to do so then you may contact us at any time to withdraw your consent. (See section 4 above).

If you wish to exercise any of these rights, or wish to object to our use of your personal data, please contact us by email at belfastbikes@nsl.co.uk or by telephone on 03433571551.

10. Does the notice apply to linked websites?

Our websites may contain links to other websites. This privacy notice only applies to this website so when you link to other websites you should read their own privacy policies.

11. When do you monitor telephone calls?

We may from time to time record telephone calls you have with our staff for training purposes and to improve the quality of our service.

12. How do we update this privacy notice?

We keep our privacy notice under regular review and we will place any updates on our webpage.

13. Who can I contact if I have queries about this privacy notice?

You can also contact us directly if you have any questions about our privacy notice or information we hold about you.

Please write to us at the address given below.

Data Protection Officer

Rutland House 8th Floor, 148 Edmund Street, Birmingham, B3 2JR

Or by email to: dpo@marstonholdings.co.uk

If you are dissatisfied with our handling of any complaint you also have the right to raise concerns with The UK Information Commissioner: https://ico.org.uk.

© NSL Limited

Version 1.0