

# About your data

A guide for patients on our arrangements for your personal data and details on how we will treat it



# Arriva Transport Solutions - Privacy Policy

Arriva Transport Solutions Limited ("We") are committed to protecting and respecting your privacy.

This policy (together with our Website Terms of Use [www.arrivatransportsolutions.co.uk](http://www.arrivatransportsolutions.co.uk) and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By accessing our services, visiting [www.arrivatransportsolutions.co.uk](http://www.arrivatransportsolutions.co.uk) or providing your information in any of the other circumstances described below, you are accepting and consenting to the practices described in this policy. For the purpose of the Data Protection Act 1998 (the "Act"), the data controller is Arriva Transport Solutions Limited of 1 Admiral Way, Doxford International Business Park, Sunderland SR3 3XP.

## 1. What personal data do we collect?

- Information provided by you: You may give us information about you by filling in forms on our site [www.arrivatransportsolutions.co.uk](http://www.arrivatransportsolutions.co.uk) (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you book patient transport, make a complaint or complete the contact us form on our website. The information you give us may include your name, address, e-mail address and phone number, NHS number, relevant medical information relating to your mobility requirements during transport, IP or MAC address.
- Information we collect about you: With regard to your journey with us or visit to our website we may automatically collect the following information; Information relevant to your journey to your patient record, such as any mobility information to assist future transport; Information related to the use of our website, including the full Uniform Resource Locators (URL) click-stream to, through and from our sites (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse

away from the page and any phone number used to call our customer service number; Information we receive from other sources. We may receive information about you in relation to your patient transport. This may include bookings for transport made on your behalf, or information necessary for your journey in relation to your care or treatment; and/or sensitive personal data. As part of the delivery of patient transport services, we will collect information classed as 'special categories of data' or 'sensitive data' (for example details about your health).

## 2. Cookies

Our website uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our sites. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy at [www.arrivatransportsolutions.co.uk](http://www.arrivatransportsolutions.co.uk)

## 3. How do we use your personal data and what is the legal basis for such processing?

The collection of the personal data described above is usually mandatory and, if such personal data is not provided, we will not be able to provide the information, products and services to you. Where the collection of any personal data is not mandatory, we will inform you of this prior to collection, as well as the consequences of failing to provide the relevant personal data. 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.

However, we will normally process your personal information only:

- where we have your consent to do so;
- where the processing is necessary to perform our contract with you; or
- where the processing is in our legitimate interests or those of a third party and such interests are not overridden by your data protection interests or fundamental rights and freedoms; and
- where we have a legal obligation to process your personal information.

### Information provided by you

We use your personal information as follows:

Purpose of Processing	Legal Basis of Processing
For the purpose of patient transport services	Performance of a contract
Responding to an enquiry on our website or receiving information regarding a complaint	Consent

### Information we collect about you

We use your personal information as follows:

Purpose of Processing	Legal Basis of Processing
For the performance of patient transport services	Performance of a contract

### Information we receive from other sources

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

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 "Questions about this Privacy Notice" heading below.

## 4. Sharing Your Information

We may disclose your personal data to the following categories of recipient for the purposes described in this Privacy Notice:

- Clinical Commissioning Groups where we supply information in line with our contract we hold with them.
- Third party transport providers such as taxi companies for the purpose of providing transport you have booked with us.
- Third party service providers who will process personal data on our behalf (such as IT service providers, communications service providers and analytics providers).

We may also disclose your personal data to any competent law enforcement body, regulator,

government agency 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 or legal rights; or (iii) to protect your vital interests or those of any other person.

We may also transfer your personal data to a buyer or potential buyer (and its agents and advisers) in connection with any reorganisation, restructuring, merger or sale, or other transferring of assets provided that we inform any receiving party it must use your personal information only for the purposes disclosed in this Privacy Notice. We operate our patient transport services under contractual arrangements with individual Clinical Commissioning Groups (CCG) and the contract may pass to a successor provider.

We may disclose your personal data to the relevant CCG and/or any successor provider and any successor provider must use your personal information only for the purposes disclosed in this Privacy Notice. Finally, we may disclose your data to any other person to whom you request us to make disclosure or if you consent to such disclosure.

## 5. Data Retention

We will not retain your personal data for longer than is necessary to fulfil the purposes for which we collected that personal information, unless the law permits or requires that we retain it for longer. The table below explains in more detail how long Arriva Transport Solutions will store different types of customer information for:

Patient Information	
Complaints	8 years, based on NHS retention guidance
All information related to patients transported by Arriva Transport Solutions	For the duration of the contract and 8 years following the end of the contract (or journey if this was not carried out as part of a contract). This is a contractual stipulation and in line with NHS retention guidance

## 6. Information Security

We apply appropriate administrative, technical and organisational security measures to protect

your personal data that is under our control from unauthorised access, collection, use, disclosure, copying, modification or disposal. All information you provide to us is stored on secure servers. We are part of the Arriva plc Group, which trains its employees regarding our data privacy policies and procedures and permit authorised employees to access personal data on a need to know basis, as required for their role. We also take steps to ensure that any service provider that we engage to process personal data on our behalf takes appropriate technical and organisational measures to safeguard such personal data.

## 7. Transferring information internationally

We do not transfer to, or process, any personal information outside of the United Kingdom.

## 8. 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. You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the bottom of this privacy notice.

## 9. 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 at any time by writing to: Arriva Transport Solutions, 1 Admiral Way, Doxford International Business Park, Sunderland, SR3 3XP or e-mailing us at [arrivatransportsolutions@arriva.co.uk](mailto:arrivatransportsolutions@arriva.co.uk)
- In addition, 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 writing to: Arriva Transport Solutions, 1 Admiral Way, Doxford International Business Park, Sunderland, SR3 3XP or e-mailing us at [arrivatransportsolutions@arriva.co.uk](mailto:arrivatransportsolutions@arriva.co.uk)
- If we have collected and processed your per-

sonal 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.

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

## 10. Regulators

ATSL is regulated for the provision of healthcare by the Care Quality Commission (CQC). The CQC has legal powers under the Health and Social Care Act 2008 to access and use information where they consider this is necessary for them to carry out their functions as a regulator. Details on how the CQC ensures compliance with data protection law (including GDPR) and their privacy statement are available on their website at <https://www.cqc.org.uk/about-us/our-policies/privacy-statement>

## 11. Questions about this Privacy Notice

If you have any questions, concerns or complaints about this Privacy notice or our handling of your personal data, you can contact us by email on [arrivatransportsolutions@arriva.co.uk](mailto:arrivatransportsolutions@arriva.co.uk) or by post to the following address:

**Arriva Transport Solutions, 1 Admiral Way, Doxford International Business Park, Sunderland, SR3 3XP**

If you are unsatisfied with the response, you can contact Arriva plc's Data Protection Officer at [data.protection@arriva.co.uk](mailto:data.protection@arriva.co.uk). You have the right to complain to a data protection authority about our collection and use of your personal information. If you are based in the European Economic Area, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries are available on the EU Commission's website via the following link: [http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm))

The controller of your personal data is ATSL.