



# Data privacy statement

## for public transport distribution model surveys

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## 1 Area of validity

This data privacy statement applies to the processing of personal data in connection with the distribution model surveys carried out on behalf of the Swiss public transport sector by the office of Alliance Swiss Pass. This data privacy statement applies to the processing of personal data within the scope of the Swiss Data Protection Act (DSG) and the General Data Protection Regulation (GDPR) of the European Union.

## 2 Contacting the company responsible for processing your data

The company responsible for processing personal data in connection with the NDV distribution model surveys is the office of Alliance SwissPass, Länggassstrasse 7, 3012 Bern. If you have any questions concerning data privacy, please use the following contact details:

Alliance SwissPass  
Data Privacy  
Länggassstrasse 7  
3012 Bern  
[datenschutz@allianceswisspass.ch](mailto:datenschutz@allianceswisspass.ch)

## 3 Purpose and legal basis of the distribution model surveys

A travel pass entitles you to use the route networks of public transport companies all over Switzerland. We carry out distribution model surveys to find out what journeys you made within a specific time period. We need this information to help us distribute revenues to the transport companies fairly. By taking part, you are helping us discharge our legal responsibilities. Under no circumstances will your data be used for advertising purposes or sold to third parties.

The head office of the Alliance SwissPass, managed by ch-integral, has a statutory mandate prescribed by the Swiss law governing the carriage of passengers (PBG) to collect travel information needed to distribute the income from ticket sales equitably. The office operates as a mandatee for the distribution of revenues received by National Direct Service on behalf of the transport companies or as a contractor for the distribution of revenues received by individual networks or transport companies. The mandate is embodied in the Ue500 agreement on the cooperation between National Direct Service and the public transport associations.

## 4 Where does the data come from?

Data from the sale of travel passes by National Direct Service is kept in a central database, which is managed on our behalf by SBB. Access to the shared database by individual transport operators and associations is regulated and restricted by a common agreement. Sharing and processing of the centrally stored data is normally limited to contract processing, ticket control, after-sales service and revenue distribution. Depending on the situation, data may also be provided directly by transport companies or their sales partners. The sharing of data with service providers is explained in the data privacy statements of the transport companies.

The personal data required for revenue distribution and the creation of distribution models is taken from the above-mentioned database and/or from the tickets collected by the sales systems.



## 5 What data is stored?

### 5.1 Customer and travel data

In order to invite our target groups, we need their contact and travel pass details. The amount of data varies depending on how the survey has been configured and the contact medium used (internet, post, telephone):

- First name and surname of customer or passenger, gender, date of birth, customer number, language of communication
- Home address
- Email, phone number
- Travel pass, class, sales channel, date of purchase, validity

These contact details are also required to enable us to deliver the prizes being offered in the prize draw.

The following information is obtained from the travel data:

- Date of travel
- Departure point, destination, connection points
- Types of transport used (rail, tram, metro, bus, PostBus, mountain railway, other)
- Invitation date, participation status, participation in the prize draw

The journey data is evaluated without reference to any names. The data is consolidated into general, impersonal information about the usage of the travel pass. The travel pass data is also used for this purpose.

The data from our online services is sent in encrypted form.

### 5.2 Logged data

When our online services are used, the servers of our hosting provider temporarily store each access in a log file and collect the following technical information:

- The IP address of the requesting device
- The date and time of access
- The name and URL of the files accessed
- Geolocation
- Searches made
- Operating system used
- Browser used
- Device type if access is by mobile phone
- Communications protocol used

## 6 Where is my data stored?

Your data is normally stored in databases managed by appointed service providers in Switzerland and the European Union.

## 7 How long will your data be kept for?

Any data collected will be completely anonymised no later than one year after the new survey distribution model has been finalised and implemented.



## 8 Will your personal data be shared with third parties?

Your personal data will only be shared with selected, authorised service providers – and only to the extent necessary for them to provide their service.

These include:

- IT and hosting service providers
- Delivery service providers

## 9 What are cookies and when are they used?

Cookies are small files that are placed on your computer or mobile device when you visit or use one of our online services. Cookies store certain settings in your browser and information about how you use our website. When a cookie is activated, it is assigned an identification number that identifies your browser and allows it to use the information contained in the cookie. Most web browsers accept cookies by default.

You can set your browser to display a warning before it saves a cookie or tell it not to store any cookies on your computer at all. You can control how your browser handles cookies in your browser's Cookie Settings. Deactivating cookies may prevent you from taking advantage of all the features of our online services.

We use cookies to enable you to automatically log in to our online services and for sending push messages. The legal basis for processing this data is our legitimate interest.

## 10 Right of access

You can request information about your stored data at any time. To do this, please refer to our contact details ([datenschutz@allianceswisspass.ch](mailto:datenschutz@allianceswisspass.ch)). You also have the right to complain to a data protection authority at any time.

## 11 Data security

We use appropriate technical and organisational security measures to protect the personal data stored we hold against manipulation, partial or complete loss, and unauthorised access by third parties. Our security measures are continually updated as new technology becomes available.

We also take internal data privacy very seriously. Our staff and our external service providers are themselves required to observe secrecy and to comply with data privacy regulations.

We take all necessary steps to ensure the safekeeping of your data. Sending information via the internet and other electronic means, however, always involves a degree of risk and we cannot guarantee the security of information sent in this way.