

# Privacy Notice

Date of last update: 21/01/2022

As a public entity commissioned by the Brussels-Capital Region to provide public transport services, we at STIB accord the utmost importance to the protection of your privacy and the protection of data. This means that one of our priorities involves treating your personal data with the utmost care and ensuring the highest level of protection in accordance with Regulation 2016/679 of 27 April 2016 *on the protection of natural persons with regard to the processing of personal data and on the free movement of such data* (hereinafter "GDPR") and the national law applicable in this area, the law on the protection of individuals with regard to the processing of personal data of 30 July 2018. As a result, we would like to provide you with as much information as possible via this declaration on the protection of personal data (hereinafter "the Declaration"). This information is intended to ensure that you have optimal control over your personal data.

## • Some definitions

To give you the best possible information, and guarantee optimal protection, we need to define the terms frequently used in this Declaration.

	Definitions under GDPR	Explanations of the terms in everyday language
Personal data	Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.	This is any information relating to a natural person who can be identified (You), directly or indirectly. It does not matter whether this information is confidential or public, or whether it relates to the private or professional life of the data subject.  For example, a name, a photo, a fingerprint, an email address, a telephone number, a social security number, an IP address, a voice recording, your browsing data on a website, data related to an online purchase, etc.
**Data subject	Identified or identifiable natural person	Our clients and non-clients, candidates as well as suppliers
Special categories of data	Personal data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.	Sensitive data forms a special category of personal data.  The European <i>Regulation</i> prohibits the collection or use of such data, except in certain cases.  The data on your state of health are sensitive data (disability).
Consent	Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;	Your <u>unambiguous consent</u> is one of the legal bases for the <u>processing</u> of your data. This consent, which you may withdraw at any time, must meet certain conditions.
Explicit consent		The "explicit" nature refers to the <b>form of expression of the consent</b> : an express declaration by the data subject is required, which implies special attention and the

		setting up of ad hoc mechanisms by the data controller.
Data Protection Officer (hereinafter DPO)	The GDPR does not offer a definition of the DPO, but dedicates a whole article the DPO's tasks, stating that "the data protection officer is involved, properly and in a timely manner, in all issues which relate to the protection of personal data".	In particular, the DPO is responsible for advising STIB on how best to comply with the GDPR and the applicable national laws. The DPO is the contact point of the Data Protection Authority, but also your first point of contact for any queries regarding your personal data.
European Economic Area		European Union + Iceland + Norway + Liechtenstein
Data controller	The natural or legal person, public authority, agency or any other body which <b>alone or jointly with others</b> determines the purposes and means of the processing of personal data.	The person, public authority, company or organisation that has control over your data and decides on any use of your data. It decides whether to create or delete a processing operation and determines why your data will be processed and to whom it will be forwarded. It has primary responsibility for the protection of your data. In this case, it is STIB.
Processor	The natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.	Any natural or legal person who carries out processing tasks on the instructions and under the responsibility of the data controller.
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.	Any use of personal data, regardless of the process used, whether computerised or manual (recording, organising, storing, consulting, modifying, reconciling with other data, transmitting, etc. of personal data).  For example: the use of your data for order management, sending newsletters, etc.

## • Who is the data controller of your personal data?

### STIB

The data controller is the Brussels Intercommunal Transport Company, a body governed by public law, whose registered office is located at Rue Royale 76, 1000 Brussels, and whose company number is 0247.499.953 (hereinafter STIB).

### Contact details

STIB Head Office  
Rue Royale 76  
1000 Brussels  
www.stib-mivb.be

This Declaration applies to the personal data that we process in our capacity as **data controller** (see definition above). It also applies when we are **joint controllers** with regard to processing in the context of certain specific processing operations (see "Joint processing between operators" below). You may exercise your rights with regard to each joint controller.

As data controller, we have a series of obligations: guaranteeing your rights, notifying you of security breaches, establishing a register, appointing a DPO, etc. As joint controllers, we have allocated these obligations and set them out in an agreement that transparently defines the responsibilities and roles of each of us in the performance of our

duties under the data protection regulations. You may exercise your rights with respect to and against each joint controller.

## DPO

We have appointed a Data Protection Officer. Any questions or requests concerning the processing of your personal data can be sent to the following email address: [DPO@stib-mivb.brussels](mailto:DPO@stib-mivb.brussels).

# . To whom and when does this Declaration apply?

This declaration applies when you use our products and services (including MOBIB), but also when you visit our offices, KIOSKS and BOOTIKs, or when you visit our website, use our apps ([stib-mivb](#), [simbus](#)), participate in a market survey, questionnaire, competition, action or event, or make any other use of our products and services.

The Declaration concerns the following persons:

- **Our customers**, i.e. regular and non-regular users of the network, whatever type of ticket they have.
- **About our business-to-business (B2B) customers:**
  - -The Declaration only applies if the B2B customer is a natural person;
  - -In the case of a legal person, the Declaration applies only to the personal data of natural persons. We only process their personal data in the context of their relationship with the B2B customer (such as agents and contact persons).
- **Non-customers**, i.e. persons who do not or no longer have a named ticket and whose data has been collected through various channels, such as competitions, the website, social networks, people in contact with the legal department, etc.
- **Candidates**, i.e. people who apply for a job at STIB, in particular via the [jobs.stib.be](#) website.
- **The contact persons within our suppliers**, i.e. any company that provides us with goods and/or services in the context of our activities.

*NB: Via our STIB products and services, you can also use the services of other parties, such as chatbot, third party websites, forums, and/or apps. STIB has no control over, and is not responsible for, the information you place on the website and the way in which it is processed. It is up to you to act with caution and to read the privacy policy/declaration of these third parties.*

# . How do we collect your data?

## A. You share data with us

We process the personal data that you send us. This may be done by telephone (for example, when you contact our customer service), in writing (for example, when you fill out a form (online), when you create a profile in MyBOOTIK, when you send us a text message or email, when you register for a competition or download a STIB application), electronically or verbally (for example, in one of our KIOSKS or BOOTIKs).

## B. Our systems collect data

We use your personal data for the use of our products and services (e.g. e-mail address, IP address, telephone number, customer number, login code(s) and passwords). Our systems also store personal data that is generated when you use our products and services (e.g. the use of Cookies).

## C. Third parties provide us with data

**We do not purchase data from external parties.** However, in the proper performance of our services, we do in some cases make use of personal data obtained via third parties. This happens, for example, when verifying household composition so we can grant discounted fares or check the right to preferential fares, which we can verify, or with the CBSS (Crossroads Bank for Social Security) or intermediaries for the use of our Taxibus services.

## . What data do we process?

We distinguish several categories of data. For example, **personal data that can identify you** as a user of our products and services (your name and identity documents...), **personal data that enables us to contact you** (for example, your address, email address and telephone number), **personal data indicating your personal characteristics** (for example, your age and gender), **billing and payment data**, **all data relating to your use of our website and applications** (on MyBOOTIK or via our customer service, shops, social media, actions, websites and mobile applications, competitions, etc.) as well as **data that you provide on your own initiative**, for example your CV as part of an application or a question or complaint to our customer service.

In addition, as required by law, **we do not process sensitive data without your explicit prior consent or if you did not provide it to us on your own initiative.** We process certain data relating to your health in the context of the provision of services for persons with disabilities (e.g. Taxibus), entitlement to special rates, via the CBSS (Crossroads Bank for Social Security), or for the processing of claims that have arisen on the network.

STIB has a strict policy regarding **the processing of the personal data of minors.** If we know or need to know that you are under 13 years of age, STIB will, in principle, request the agreement of your parent(s) or guardian(s).

We use **anonymous, aggregated data** for commercial and service purposes and for internal/external reporting and statistical purposes. This data can never relate to a specific natural person. Some examples: validation reports (how many people were present at a given time in a given vehicle or station, etc.), event organisations, reports on the use of a certain line, for example to determine the frequency of use.

We also give you the opportunity to use our services anonymously via the MOBIB Basic card. This card is not linked to any personal data.

## . What is the justification for processing my data?

As a public transport operator in the Brussels-Capital Region, we are regularly in contact with your personal data. The processing of your data is governed by a legal framework; it is important to us that you are sure that your data is processed in an ethical, legal and secure manner.

In accordance with the principle of lawfulness of the GDPR, **our processing operations always have a legal basis.** This means that we use your personal data only if its use is justified by one of the following legal bases:

- the execution of the **contract** to which you are a party (including pre-contractual measures and the termination of the contract);
- compliance **with the legal or regulatory provisions to which we are subject;** (e.g. in terms of accounting);
- carrying out a task of public interest: STIB is in fact responsible, in particular via the Decree of the Government of the Brussels-Capital Region of 18/07/1996 laying down the specifications to which the Brussels Intercommunal Transport Company is subject, for carrying out tasks of public interest, principally the provision of public transport in the Brussels-Capital Region;
- the **legitimate interests of STIB**, in which case we always ensure a balance between these interests and your privacy, freedoms and fundamental rights;
- or a combination of these bases.

We will always ask for **your prior consent** if the processing of your personal data does not fall within the scope of one of these principles. You give your consent through a positive action (such as ticking a box). **You are free to withdraw your consent at any time.**

## • Why do we collect personal data?

We process personal data for a variety of purposes and, in accordance with the purpose limitation principle (data may only be processed for the intended purpose) and minimisation, only process the data that is strictly necessary to achieve the intended purpose. If there is a purpose other than that originally intended, you will be notified and your consent will be required. This is not the case only if the new purpose is the compilation of statistics. **Details of the purposes are given below.**

## • How do we secure your data?

We have appointed a **DPO**, who advises us on the applicable data protection rules. They also help us to check whether we are complying with these rules.

We only make your data available to employees or subcontractors if it is strictly necessary for the performance of their duties.

For new processing operations, as well as for existing processes that may give rise to a high risk, we carry out a **data protection impact assessment** in advance to determine the most appropriate security measures.

In addition, we have also taken appropriate technical, physical and organisational measures to protect your personal data against destruction, loss, inadvertent modification, damage or disclosure.

Nevertheless, should a data leak occur, and if it is likely to pose a high risk to your rights and freedoms, you, as a data subject (customer or non-customer, including candidates and suppliers), will be personally notified under the circumstances provided for by law.

## • How long do we keep your data?

In accordance with the data retention principle of the GDPR, **STIB keeps your data for a previously determined period of time.** STIB has thus determined precise rules concerning the length of time your personal data is kept. This duration varies according to the various intended purposes, and must take into account possible legal obligations.

Your data is kept, as a maximum, for the period needed for processing for the purpose for which it was collected. This period varies according to the purpose for which it is intended.

The storage period can sometimes be very short, but may sometimes be longer, for example to fulfil our legal obligations or due to a legal necessity (in the context of litigation). There is only ever limited access to the archived data. After the expiry of the applicable conservation period(s), the personal data is deleted or anonymised for internal or external statistical purposes.

For more information, please [click here](#).

## • Who do we share your data with?

**We do not sell your personal data to third parties.**

While we **never** sell your data, in some cases we pass it on to third parties for various purposes:

- [If this is necessary for our service provision](#)

Some of our databases are made available to third parties who are working on our behalf and assisting us in providing our products and services. For example, consider the **outsourcing of certain HR tasks** (recruitment, external assessment, etc.) or **IT tasks (IT support)**.

In this respect, your data is transmitted solely for the purposes for which STIB itself processes your data as data controller, and is limited to the data that these third parties require for the performance of their task on our behalf (processor).

- **Existence of a legal obligation**

In this respect, we refer to what has already been mentioned above regarding the justification of the use of your personal data. Your data could be transferred to **public administrative or judicial authorities (e.g. request from the police, justified by a formal report, from an examining magistrate, justified by a warrant, or from a public prosecutor by means of an apostil).**

- **If there is a legitimate interest for STIB**

We will only pass on your personal data if our legitimate interest outweighs your fundamental rights and freedoms. We will also always inform you in a transparent manner. For example, your personal data may be passed on to **credit checkers, debt collection agencies and legal service providers, as well as to partners with whom we are working on a specific action** (for example, a travel agency, for a STIB competition in which you can win a trip).

- **If you authorise us.**

If STIB passes on personal data to third parties in other situations, this will **always** be following an explicit notification, in which information is provided about the third party, the purposes of the transmission and the processing itself. This notification will be a prerequisite for the necessary collection of your consent to this new treatment. Please note that your explicit consent will be requested should this new processing involve sensitive data (such as health data). For example, as already mentioned above, when processing a claim, we have to provide your personal data and possibly data relating to your health to insurance companies, (medical) experts, lawyers, etc. For this purpose, we will ask for your explicit consent in advance, unless you provide us with this data yourself.

- **Writing external reports**

We use anonymous, aggregated data for external reporting and for statistical purposes. This data can never relate to a specific natural person. Some examples: **validation reports** (how many people were present at a given time in a given vehicle or station, etc.), event organisation, reports on the use of a certain line, for example, to determine the frequency of use. STIB always guarantees that the parties to whom this data is transmitted can never use the data received from us to identify a particular natural person (anonymisation).

## • Is your data transmitted abroad?

### **Data transfer within the European Economic Area**

Certain data is transferred within the European Economic Area for the purposes of certain processing operations. Within the European Economic Area, please be aware that personal data receives the same level of protection everywhere, since this entire area is subject to the GDPR.

### **Data transfer outside the European Economic Area**

We transfer and/or grant access to your personal data to a processor located in countries outside the European Economic Area only when:

- they are located in a State which ensures an adequate level of protection by virtue of a **decision on adequacy** taken by the European Commission;
- **appropriate safeguards** have been implemented in accordance with the GDPR, such as:
  - **the signature of the standard contractual clauses adopted by the European Commission** for the transfer of personal data to processors established in third countries (2010/87/EU);
  - **the use of approved binding corporate rules** or;
  - **the application of an approved code of conduct.**

Any transfer of personal data to a country outside the EEA will cease immediately if the adequacy decision or other equivalent guarantee on which the transfer is based is invalid or if the conditions are no longer met.

For more information and/or a copy of the guarantees, please contact us via our contact form or send us an email to [DPO@stib-mivb.brussels](mailto:DPO@stib-mivb.brussels).

## . What are your rights?

### General

The GDPR gives you rights that allow you control over your personal data. Please note that in order to exercise your rights, and to prevent any unlawful disclosure of your personal data, we need to verify your identity.

### *Is there a charge for this?*

You may exercise your privacy rights free of charge, unless your request is manifestly unfounded or unreasonable, i.e. due to its repetitive nature. In this case - in accordance with privacy legislation - we have the right and can choose to either (i) charge a reasonable fee (taking into account the administrative costs of providing the information or making the requested disclosure and the costs associated with the requested measures), or (ii) refuse to comply with your request.

### *In what format will I receive a response?*

If you submit your request electronically, the information will be provided electronically, if possible, unless you request otherwise. If you send us a request by post, we will reply to you by the same method. In short, we will apply a symmetry of communication methods, unless you request otherwise. In any event, we provide you with a succinct, transparent, understandable and easily accessible answer.

### *When will I receive an answer?*

We respond to your request as quickly as possible, and always within one month of receiving it. The deadline may be extended by a further two months, depending on the complexity and number of requests. If the deadline is extended, we will inform you within one month of receipt of the request.

### *What happens if STIB does not comply with my request?*

We will always inform you in our reply of the possibility of lodging a complaint with the supervisory authority.

#### **By post:**

Data Protection Authority  
Rue de la Presse, 35  
1000 Brussels  
+32 (0)2 274 48 00

**By email:** [contact@apd-gba.be](mailto:contact@apd-gba.be)

**Via the website:** <https://www.dataprotectionauthority.be/>.

### *How do I exercise my rights?*

To do this, simply send us a request via our "DPO/exercise my rights" contact form or contact us by email at [DPO@stib-mivb.brussels](mailto:DPO@stib-mivb.brussels) with the subject line "right of access/omission/limitation/opposition: personal data".

For access rights, please send us your MoBIB card number. If the email address you are using to contact us is not the one linked to your card, please also attach a copy of the front of your ID card.

For other rights, please provide us with a copy of the front of your identity card.

We need this information to check your identity and thus ensure that you are the data subject and therefore entitled to exercise your various rights.

If you are unable to access your information by email, you can send us your request by **post** to the following address:

STIB  
62 Rue des Colonies  
1000 Brussels  
Belgium

Written requests must be signed and accompanied by a copy of the front of your identity card as well as your MOBIB card if you have one. The request must state the address to which the reply should be sent. A reply will then

be sent to you within one month of receipt of the request. This period will be extended by two months if the request requires in-depth research or if we receive too many requests. The extension of the deadline will always be explained and notified within one month of receipt of your request.

STIB may request reasonable compensation to cover its administrative costs for any additional copies you request.

**Concerning your right of access:** you will receive a **free** copy of your data in electronic format within one month of receipt of the request. This period will be extended by two months if your request requires in-depth research or in the event of an excessive workload; you will always be notified of this extension within one month of your request, and it will be explained. We draw your attention to the fact that your right to obtain a copy will not succeed if it infringes the rights and freedoms of others.

**With regard to your right to be forgotten:** we cannot always delete all personal data, so you should bear in mind that this right is not absolute. We have to balance it with other important rights or values, such as freedom of expression, compliance with a legal obligation to which we are subject, important reasons of public interest, or the need for certain data for the establishment, exercise or defence of legal rights. We will provide you with more information about this in the reply to your request.

#### *Your right of access:*

You have the right to find out from STIB at any time whether or not we have processed your personal data and, if we have, to inspect and/or obtain a copy of it. You can also obtain more information on:

- the purposes of processing;
- the categories of personal data concerned;
- the recipients or categories of recipient (including recipients in third countries, where appropriate);
- if possible, the retention period or, if this is not possible, the criteria for determining that period;
- the existence of your privacy rights;
- the right to lodge a complaint with STIB via [DPO@stib-mivb.brussels](mailto:DPO@stib-mivb.brussels) or directly with the supervisory authority;
- information we have about the source of the data if we obtain personal data from a third party; and
- the existence of automated decision-making.

#### *Your right to correct personal data (correction)*

You have the right to have your incomplete, incorrect, unsuitable or outdated personal data corrected without delay. To keep the data up to date, for example when you move house or change your email address, we therefore ask you to notify us of any changes via our customer service department, either by telephone or by email using our contact form.

#### *Your right to have your data deleted (the 'right to be forgotten')*

You have the right to have your personal data deleted in the following cases:

- your **personal data is no longer necessary for the purposes** for which they were collected or otherwise processed by STIB;
- **you withdraw your consent** on which the processing of your personal data by STIB is based;
- **you object to the processing** of your personal data and there are no more important, legitimate reasons for processing/further processing by STIB;
- **your personal data has been processed in an unlawful manner**, not in accordance with the GDPR and Belgian law;
- your personal data must be deleted to **comply with a legal obligation** provided for by European Union law or by national law to which STIB is subject;
- your personal data was collected within the framework of the offering of a website aimed at children;
- for a reason of your own, you consider that one of the processing operations carried out infringes your privacy;

Please note that if you have applied for a position at STIB, we will always keep the collected data for a period of five years from the last contact. You will only be able to exercise your right to be forgotten at the end of this period. There are compelling and legitimate reasons for retaining the data, linked to the very large number of applications submitted annually to STIB. For more information, please consult the FAQs on our "recruitment" website.



### *Your right to object to the processing of your personal data*

On the basis of your particular situation, you have the right to object to the processing of your personal data if this processing is based on the legitimate interests of STIB or on the general interest. STIB will stop processing your personal data, unless it can demonstrate that there are legitimate and compelling reasons for processing that prevail over your interests, rights or freedom or for the establishment, exercise or defence of legal rights.

This means that your request will not be successful:

- if the processing is necessary for the conclusion or performance of your contract
- if the processing was required by law or regulations
- if the processing is necessary to establish, exercise or defend rights in court

### *Regarding your right to object in direct marketing.*

**Do you not wish to receive any form of commercial communication?** You always have the right to object, without giving reasons, to the use of your personal data for direct marketing or promotions and/or to disable actions by telephone, post, text message or email. To this end, you can contact STIB's customer service via the website, go to a STIB KIOSK or BOOTIK, or change your online profile via MyBOOTIK.

Website users who are not STIB customers will only receive commercial communications by text and/or email after they have given their clear consent.

This opposition to the processing of your data for direct marketing purposes is naturally without prejudice to our right to contact you electronically in the framework of the execution of your contract or if we are obliged to do so by law.

### *Your right to limitation of processing:*

You have the right to ask us to limit your data, i.e. to mark (e.g. temporarily move your data to another processing system or lock your data so that they are inaccessible) your stored personal data in order to limit their further processing.

You have the right to limit the processing of your personal data if one of the following applies:

- you dispute the accuracy of this personal data: their use is limited for a period that allows STIB to check the accuracy of the data;
- the processing of your personal data is unlawful: instead of deleting your data, you ask for its use to be limited; its processing is not compliant with GDPR and Belgian law;
- STIB no longer needs your data for the original purposes of processing, but needs it to initiate, exercise or support a legal action, in which case, instead of deleting your data, its use is limited to initiating, exercising or supporting the legal action. You request the limited use of your personal data pending a decision on the exercise of your right to object to the processing.

## • **Cookie Policy**

In this respect, we refer to the separate declaration on the [Cookie policy](#), which you will also find on our website.

## • **Would you like to contact us about this Declaration?**

If you wish to contact the STIB Customer Care department about this Privacy Declaration (e.g. to change your privacy settings), you can do so in writing, by telephone or by email. All the information on STIB Customer Care can be [found here](#).

For more information on this privacy declaration or for complaints regarding the processing of your personal data, you can contact the STIB Data Protection Officer via [DPO@stib-mivb.brussels](mailto:DPO@stib-mivb.brussels)

## • Can STIB modify this Declaration?

STIB may amend this Declaration on the protection of personal data from time to time, for example to take account of any legislative or regulatory changes or the development or emergence of new STIB processing activities. Please always consult the latest version of this Declaration on our website (<http://www.stib-mivb.be/index.htm?l=en>). We will inform you in advance via our website. The date of the last modification is always at the top of the Declaration.

## • Appeal to the supervisory authority

You can contact the Data Protection Authority for complaints about STIB's processing of your personal data.

**By post:**

Data Protection Authority  
Rue de la Presse, 35  
1000 Brussels  
+32 (0)2 274 48 00

**By email:** [contact@apd-gba.be](mailto:contact@apd-gba.be)

**Via the website:** <https://www.dataprotectionauthority.be/>.

## • Why do we process your data?

### **1- Issuing of tickets:**

In most cases, a certain amount of personal data is necessary to issue tickets. The personal data processed depends on the type of ticket.

#### **1/ What is the purpose?**

- Issuing of the named MOBIB card

#### **What data?**

The MOBIB card is a medium that allows you to load an anonymous transport ticket or a personalised subscription.

The creation of the personalised MOBIB card involves the collection of the following data:

- last name, first name
- sex
- date of birth
- address
- contact details (mobile phone number, email address)
- a photo
- national registry number

This data is necessary for the management and updating of our customer file.

No additional data is collected when anonymous tickets are loaded onto the MOBIB card.

#### **What is the justification?**

We process this data in order to fulfil the task of **public interest** entrusted to us by the regulations, namely the provision of a transport service in the Brussels-Capital Region.

STIB also needs this data in order to fulfil its contractual obligations. Indeed, the provision of the transport service would not be possible without the processing of such data.

However, transport can also take place with an anonymous card such as a MOBIB Basic card or a paper ticket.

### **What is the origin of the data?**

We collect this information from you when you purchase a named MOBIB card.

If you receive your MOBIB card through a third-party payment system, this information may also be provided to STIB by this third party.

### **Is your data transmitted?**

Payments for the purchase of a MOBIB card are made through a payment service provider, to whom we transmit your bank details in order to carry out the payment.

We may also share this data with other transport service providers. For example, when you choose an interoperable ticket. For example, you may have a MOBIB card issued by SNCB, in which case your consent to the sharing of data will be requested when you first purchase a ticket.

This data may also be transmitted within the framework of a third party payment system. The data could be sent to your employer if they pay for your MOBIB card.

### **How long can the data be kept?**

We keep this data for a maximum of one year after your card expires (five years) plus the validity of your last ticket (maximum three years).

## **2/ What is the purpose?**

- Issuing of a personalised subscription

### **What data?**

**A subscription giving access to the entire STIB or MTB network can be loaded onto a MOBIB card. In this case, the following data may be added to that collected for the creation of the MOBIB card:**

- family composition
- the licence plate number and the date of entry into service (if the "Bruxell'air" premium has been obtained beforehand)
- type of client (if applicable: social status, disability, beneficiaries of the national solidarity status for victims of terrorist acts)
- the school attendance certificate for the over 18s

The collected data enables us to determine the appropriate fare (verification of your right to certain types of subscription, in particular for children/senior citizens/persons who have BIM status or are dependent on a CPAS, or even a potential discount potentially depending on the composition of the household).

### **What is the justification?**

We process this data in order to fulfil the task of **public interest** entrusted to us by the regulations, namely the provision of a transport service in the Brussels-Capital Region.

STIB also needs this data to fulfil its contractual obligations. It would not be possible to provide the transport service if we did not process this data.

### **What is the origin of the data?**

We collect this information when you load your subscription onto your MOBIB card. If you receive a subscription card through a third-party payment system, this information may also be provided to STIB by this third party.

### **Is your data transmitted?**

Payments for the purchase of a ticket are made through a payment service provider, to whom we transmit your bank details in order to carry out the payment.

We may also share this data with other transport service providers, for example, when you choose an interoperable ticket. For example, you may have a MOBIB card issued by SNCB, in which case your consent to the sharing of data will be requested when you first purchase a ticket.

This data may be transmitted within the framework of a third party contract. When your employer takes over your MOBIB card, it could be sent to your employer.

### How long can the data be kept?

We keep this data for a maximum of one year after your card expires (five years) plus the validity of your subscription(one year).

### 3/ What is the purpose?

- Issuing of tickets via the anonymous MOBIB card ("Basic card"): the Basic card is anonymous in that **we do not collect any personal data.**

### 4/ What is the purpose?

- Issuing of paper tickets

We do not collect and therefore do not process any personal data for paper tickets.

## 2- Use of the MoBIB card: validation on the STIB network

In accordance with article 3.7 of the Decree of the Government of the Brussels-Capital Region of 13 December 2007, any user entering a STIB vehicle must validate their transport ticket.

As a reminder, the personalised MoBIB card contains personal data (for more information, see "Issuing of tickets" processing above) and the MoBIB basic card does not contain personal data (anonymous data).

### For what purposes?

- **Management of tickets:** information on the number of journeys and re-creation of a ticket if the MoBIB card has to be replaced (for the personalised MoBIB card: if the card holds a ticket other than a subscription)
- **Provision of a declaration of use** of public transport at the request of the user (only for the personalised MoBIB card: see access rights)
- **Technical management of tickets:** detect technical anomalies (for the personalised MoBIB card: if the card holds a ticket other than a subscription)
- **Fraud management:** ensure that each user has actually paid for their journey and, conversely, detect users travelling with a fraudulent ticket
- **Statistical management:** adapt the transport service in accordance with the stops used; transmission of statistical data to the authorities to assist with the development of a mobility policy
- **Determination of the amount of the subsidies** granted to the STIB by the Brussels-Capital Region

The MoBIB card holds information on the tickets purchased, and in particular the last validation, thus enabling the calculation of transfers between vehicles (not counting another trip).

### What data?

The validation of the MoBIB card (basic MoBIB card and personalised MoBIB card) at the terminals placed outside and inside the vehicles implies the collection of the following data:

- the serial number of the MoBIB card
- the stop where the card was validated
- the vehicle in which the card was validated
- the validator (the identifier of the terminal at which the card was validated)
- the status of the release (use of a ticket or transfer)
- the validation date
- the validation time
- the number of trips remaining after validation

### What is the justification?

We process this data in order to fulfil a mission of **public interest**. The STIB is in fact responsible, in particular via the Decree of the Government of the Brussels-Capital Region of 18 July 1996 laying down the specifications to which the Brussels Intercommunal Transport Company is subject, for carrying out tasks of public interest, principally the

provision of public transport in the Brussels-Capital Region. This mission of public interest is also mentioned in the management contract signed by the STIB and the Brussels-Capital Region.

The anonymised validation data is used to adapt the STIB's transport offer to the number of people using its stops (determination of timetables with peak and off-peak times and school holidays, as well as the length of vehicles required) and to provide statistical data to the authorities so that they can draw up an efficient mobility policy and thus determine the subsidies needed by the STIB.

### **What is the origin of the data?**

We collect validation data when you pass your MoBIB card over one of the validators at the entrance to metro stations or in STIB vehicles.

### **Is your data transmitted to third parties?**

If your MoBIB card comes from another public transport operator and you are using the STIB network, information about the use of your ticket will be transmitted to the operator who provided you with the ticket via BMC. Information on the validation location will not be transmitted.

### **How long can the data be kept?**

We keep the validation data of personalised MoBIB cards for a maximum of six months plus the current month. After this period, the validation data is anonymised and used to determine our transport offer and compile statistics for the authorities.

The validation data for other tickets is anonymous as soon as it is collected.

## **3- Pay with a bank card:**

Contactless payments are possible throughout the STIB network. This means validating your trip directly with your bank card (debit or credit) or with an emulation of the card on your smartphone.

### **What is the purpose?**

- **Fare management:** information on the number and types of trips made
- **Fraud management:** ensure that each user has actually paid for their journey and, conversely, detect users travelling with a fraudulent ticket
- **Statistical management:** adapt the transport service in accordance with the stops used; transmission of statistical data to the authorities to assist with the development of a mobility policy
- Determination of the amount of the subsidies granted to the STIB by the Brussels-Capital Region

### **What data?**

When you use the contactless payment facility to validate your trip, the following additional data is collected in a secure environment:

- bank card number
- bank card validity date
- validation data: date, time and place of validation

This secure environment meets PCI DSS requirements. It is used to secure payment and to make the information unreadable to prevent unauthorised use.

The validation data (except the location) can be accessed if you create a MyBOOTIK account (see "Sites and applications" processing)

### **What is the justification?**

We process this data in order to fulfil the task of **public interest** entrusted to us by the regulations, namely the provision of a transport service in the Brussels-Capital Region.

### **What is the origin of the data?**

You provide this information when you validate your bank card for the purchase of a ticket and when you register your card via your account on MyBOOTIK.

### **Is your data transmitted to third parties?**

We share this data with our payment service providers and the company that manages our payment management platform.

**How long can the data be kept?**

We keep this data for a maximum of one year after the validation of your last trip with your bank card.

**4- Use of the MOBIB card (Joint processing between operators)**

STIB collects and processes your personal data in the context of a **task of public interest** which involves exchanging personal data in order to facilitate interoperability, i.e. the use of the same card on different networks, and to simplify the management of the MOBIB card by all public transport operators individually. It is important to note that in this context, STIB acts as **joint controller with Brussels Mobility Card S.A (BMC) and the other transport operators.**

**What data?**

Information relating to the MOBIB (MOBIB number, serial number, expiry date, active or deactivated - the tickets loaded onto the card (product number, first and last validation, departure and last stop, class, period of validity); a computer application, the "CenSy", centralises this data.

**What is the justification?**

**Task of public interest** (see above). Personal data is processed solely to enable and promote interoperability between BMC and the four transport operators via CenSy.

In this context, the data will not be processed by STIB for its own purposes.

**Is your data transmitted?**

By its nature, processing involves data transmission between BMC and the transport operators.

**How long can the data be kept?**

Your data is kept for the period of validity of your MOBIB card, which is extended by three years.

*Please consult the Brussels Mobility Cards Declaration if you would like more information on the nature of this processing.*

**5- Mobility aid for people with disabilities: Taxibus**

**What is the purpose?**

- Public transport on demand, door-to-door, for persons with disabilities, potentially accompanied by an able-bodied person

**What data?**

- last name, first name
- place and date of birth
- ID card number
- national registry number
- financial data (provision)
- health data

**What is the justification?**

We process this data in order to fulfil the task of **public interest** entrusted to us by the regulations, namely the provision of a transport service in the Brussels-Capital Region. The transport of persons with disabilities is explicitly mentioned in the management contract between STIB and the Brussels-Capital Region.

**What is the origin of the data?**

We collect this data from you when you make your first booking.

**Data transmission**

We (Customer Care) may pass on this information to third parties who carry out these journeys at our request (we have a partnership with "green taxis").

**Data Retention period:**

We keep this data for a maximum of five years after the last booking.

**6- After-sales service management (contacts with Customer Care)**

**What purposes?**

- Respond to the customer's or third party's request expressed via telephone, social networks, email or the contact form
- Send unresolved problems unresolved by Customer Care to the relevant departments
- Respond to a request from a customer or third party to find a lost item on the STIB-MIVB network

**What data?**

Data provided by the person contacting Customer Care as well as all data previously collected in the context of a customer relationship (see purpose 1).

In addition, calls may be recorded. This is mentioned before the contact is made with one of our employees and you have the possibility to refuse this recording at that moment.

The data collected through the contact form is the following:

- Identity data (surname, first name, date of birth)
- Contact data (email address, telephone number, postal address)

**What justification?**

This purpose is based on STIB-MIVB's legitimate interest in processing personal data of its customers or third parties since, without this, STIB-MIVB is unable to process the incoming requests and/or questions.

**What is the origin of the data?**

We collect this data from you when you call us or contact us via email or the contact form.

**Is your data passed on to third parties?**

We pass on this data to the company that manages our after-sale service platform.

**What is the retention period?**

We keep this data for a maximum of 5 years after the contact.

data for a maximum of one year after your card expires (five years) plus the validity of your last ticket (three years).

**7- Management of major works:**

**What is the purpose?**

- To communicate with local residents about the impact of the work.

**What data?**

- Identity data (surname, first name)
- Contact data (phone number)

**What is the justification?**

STIB processes this data so that it can warn local residents of the progress of the work and therefore of its impact (in particular car access in the streets concerned, etc.). This network maintenance, development and extension work is in the public interest and is entrusted to STIB by the Brussels-Capital Region. Information on its development and impact on daily life is one of the possibilities offered, and processing is therefore justified by **consent**.

**Is your data transmitted?**

The data is passed on to the company that manages our communication platform.

### **How long can the data be kept?**

The data is only kept for the period during which the work is carried out.

## **8- Partner relationship management**

### **What is the purpose?**

- To communicate with the contact persons of our partners, suppliers and/or tenderers

### **What data?**

- Identity data
- Contact data
- Curriculum Vitae

### **What is the justification?**

**STIB's legitimate interest** in collecting and processing data relating to the contact persons of tenderers, suppliers and/or partners is part of the contract negotiation and/or **execution process**, the need to negotiate and/or execute the contract with you or your company.

### **How long can the data be kept?**

The data is kept for ten years from the end of the contractual relationship or five years from the end of the negotiation.

## **9- Application management:**

### **What is the purpose?**

- Receipt and registration of applications sent to STIB by electronic means (via the website or by email) or by post
- Response to candidates
- Dispute management
- Management of the recruitment reserve list
- Reuse of test, interview and assessment results

### **What data?**

We collect the following data **if you create a profile in order to apply** for a job at STIB:

- name
- date of birth
- email address
- national registry number

We also collect the following additional data **during the recruitment process**:

- sex
- address
- telephone number
- the training courses followed
- Curriculum Vitae
- any information that you voluntarily provide to us
- the results of your interviews, tests and assessments, if applicable

### **What is the justification?**

We process this data in order to manage your application for a current or future job (negotiation and potential drafting of your employment contract; this data is therefore processed in the context of implementing pre-contractual measures. Furthermore, we process this data in the context of our **legitimate interest**, so that we can identify and contact the people we wish to participate in the recruitment process; this means that, if necessary and relevant, we can re-use the results of tests, interviews and/or assessments (see the FAQs on our recruitment website) and, ultimately, recruit the staff most suited to the position for which they are applying. We also need to verify the accuracy of the data concerning skills (e.g. driver's licence).



### **What is the origin of the data?**

You provide the data as an applicant. Temporary employment agencies or external recruitment agencies may also provide us with this information.

### **Is your data transmitted?**

Your data may be passed on to external recruitment agencies which are responsible for carrying out recruitment on our behalf. With the exception of this example, data is not passed on to third parties.

### **How long can the data be kept?**

We will keep your contact details as a candidate for a period of five years after the application so that we can contact you again should you be suitable for another position. If the application is successful, we will transfer the data collected during the application process to our personnel file.

## **10- Detection of fraud such as tailgating or leaping over the barriers at metro and pre-metro gates**

### **For what purposes?**

Processing allows the STIB to organise a targeted check of STIB tickets in metro and pre-metro stations by determining where the check should start.

### **What data?**

Processing uses as a starting point a photo of the offence taken automatically whenever sensors detect tailgating or barrier jumping at metro or pre-metro gates. Due to the large number of passengers throughout the inspection area, it is important that officers are able to determine where they will begin their checks and can best target these ticket inspections.

Secure access to the data is granted only to sworn agents on duty in the control area at the time the fraud was detected.

### **What is the justification?**

The processing is part of the implementation of the STIB's public interest mission, more specifically the fight against fraud.

### **Is your data transmitted?**

Your data is not sent to third parties?

### **How long can the data be kept?**

"Photo" data is kept for a maximum of 30 minutes on the STIB server and two minutes on the RAM of the control agent's tablet. The data is deleted after this period.

## **11- Passenger screening and fines**

### **What is the purpose?**

- To impose a surcharge for failure to hold a valid ticket
- To impose an administrative fine

STIB carries out checks to ensure that passengers are in possession of a valid ticket and that they use it correctly (in particular, that they comply with the obligation to validate it when they board a vehicle). STIB inspectors can also impose a fine on users who cause nuisance in and around a vehicle or disrupt the service (damage to equipment, voluntary slowing down of vehicles, etc.). They may also issue tickets for specific traffic offences, such as parking at stops or driving in transport lanes.

### **What data?**

**In the event of a fine**, we collect the following data:

- last name, first name
- place and date of birth
- nationality
- ID card number
- national registry number
- sex
- the licence plate number (if it is a vehicle offence)
- address
- in the case of a minor: the surname, first name, address of the parents, date of birth of the carer or persons responsible for the minor
- mobile phone number
- previous infringements
- subscription data (including other public transport companies)
- email address
- the place of inspection (vehicle number, line number, stop)

This information is required for us to verify your identity and to process the fine file. You can also find details of this procedure in the [STIB Transport Rules](#) published on our website.

#### **What is the justification?**

Passenger screening and the imposition of administrative fines involve processing operations justified by the performance of our **task of public interest**. The user must contribute to the cost of the service and dissuasive measures must be taken to prevent users from damaging the equipment needed to provide our services.

#### **What is the origin of the data?**

We collect this information from you during the check and verify and/or supplement it with information from the national register.

#### **Is your data transmitted?**

Surveillance camera footage can be transmitted to the competent judicial authorities (police, public prosecutor's office, investigating judge).

#### **How long can the data be kept?**

The retention period of this data is determined by law. This period is five years, starting from the date of the fine.

### **12- Management of disputes, claims and compensation requests**

#### **What is the purpose?**

- To have the **necessary information to be able to communicate with the parties involved in a dispute**
- To have the necessary information for claiming compensation in the event of damage suffered by STIB
- To have the necessary information for responding to a request for compensation in the event of damage caused by STIB

#### **What data?**

- Identity data of the parties (parties to the accident) and witnesses
- Household composition data
- Identity data of any agents (lawyers, insurers, etc.)
- Identity data provided by the public authorities
- national registry number
- financial data
- health data

#### **What is the justification?**

This management task stems from the **legitimate interest** of STIB. It is important for STIB to be able to react in an appropriate and therefore documented manner in the event of a dispute, an accident or a request for compensation.

**What is the origin of the data?**

The data may be provided to us by you, but also by experts, insurance companies, insurance brokers, lawyers, bailiffs, notaries, or surveillance camera images.

**Is your data transmitted?**

The data processed during this processing may be transmitted to lawyers, bailiffs, experts, insurance companies, notaries and the competent judicial authorities.

**How long can the data be kept?**

We keep this data for a maximum of 20 years after the file is closed, depending on the applicable limitation periods.

### **13- Management of cameras**

**What is the purpose?**

- To ensure the safety of users (vehicles and stations)
- To ensure staff safety (STIB MIVB buildings)
- To ensure the safety of STIB assets (stations, STIB MIVB buildings and vehicles)
- To enable a rapid response by the appropriate personnel (vehicles and stations)
- To ensure the management of disputes, claims and compensation requests (vehicles and stations)
- Assistance with driving/driver while driving vehicles (vehicles)

The STIB has cameras in the stations, in the various STIB MIVB buildings and in public transport vehicles (bus, tram and metro). The new transport vehicles (from 2021) will also be fitted with cameras on the vehicle. Their presence is indicated by a regulatory pictogram. STIB has introduced an internal policy for the management of its cameras.

**What data?**

The images collected by the different cameras.

**What is the justification?**

To guarantee the safety of STIB users and property is one of the tasks assigned to STIB by the Brussels-Capital Region, and this task is in **the public interest**. The legal basis of the aim of managing its own disputes is legitimate interest.

**Is your data sent to third parties?**

The images from the surveillance cameras may be sent to the relevant judicial authorities (police, investigating judge), provided that their requests meet the legal conditions for access (see processing below).

**How long can the data be kept?**

In accordance with the camera law, we only keep images for 30 days. Recordings will be taken and kept for a period of five years in the event of an accident or incident.

### **14- Reporting potential risks with analytics cameras**

**For what purposes?**

STIB carries out anonymous passenger volume counts in metro stations to measure platform occupancy rates. This count is carried out using cameras installed in metro stations, which only manage filling data. The information we obtain from these analyses is used internally to:

- detect safety risks on platforms (e.g. overcrowded platform)
- map platform occupancy rates, particularly to guarantee safety (e.g. analysis of flows leading to platform redevelopment)

The results of these analyses and reports do not contain any personal data.

### **What data?**

The processing starts with personal data (images of passengers) and provides anonymised count data. The conversion process takes place in the camera via software. Under no circumstances are the images recorded, transferred or viewed. The analysis reports do not contain any personal data.

The anonymised data processed is the following:

- number of travellers in a defined area
- location of passengers (e.g. start or end of platform)

### **What is the justification?**

The analyses fall within the framework of the legitimate interests pursued by STIB to anticipate potential safety risks on its network.

### **Is your data transmitted?**

The information we obtain from these analyses is used only by STIB. This data is not transmitted externally to STIB.

### **How long can the data be kept?**

For models predicting the evolution of our passenger numbers, the extent of the records is one of the main factors that influences the quality of the predictions. For this reason, we keep this data in an anonymised form for a period of 20 years.

## **15- Passenger flow management**

### **For what purposes?**

STIB carries out passenger flow counts in metro stations to measure the volume of people using its infrastructures. This count is carried out using cameras installed in metro stations, which only manage volumetric data. The information we obtain from these analyses is used internally to:

- adapt supply to demand, for example, to adapt vehicle frequency to the volume of users;
- map passenger flows in the various corridors and accesses, in particular to ensure safety (e.g. sizing of the number of access gates);
- measure volumes of passenger connecting between the different platforms of a station.

The results of these analyses and reports do not contain any personal data.

### **What data?**

The processing starts with personal data (images of passengers) and provides anonymised count data as an output. The conversion process takes place in the camera via software. Under no circumstances are the images recorded, transferred or viewed by persons.

The analysis reports do not contain any personal data.

The anonymised data processed is the following:

- passenger numbers
- line used
- line direction

### **What is the justification?**

The analyses fall within the framework of the legitimate interests pursued by STIB.

### **Is your data transmitted?**

The information we obtain from these analyses is used by STIB. We may transmit passenger number data (containing no personal data) to external companies (emergency services, consultancy companies, station businesses, etc.).

### **How long can the data be kept?**

For models predicting the evolution of our passenger numbers, the extent of the records is one of the main factors that influences the quality of the predictions. For this reason, we will keep this (anonymised) data for a period of 20 years.

## **16- Marketing to our customers and non-customers**

### **1/ What purpose?**

Sending occasional marketing campaigns by email to customers

### **What data?**

- Identity data (surname, first name, date of birth)
- Contact data (email address, telephone number, postal address)
- Data linked to the MOBIB card (card number, type of season ticket)

### **What justification?**

STIB-MIVB processes this data on the basis of the **legitimate interest** of informing its customers about the goods and services the company offers.

Your **consent** is sometimes required in accordance with the specific rules on advertising by email (Article XII.13(1) of the Code of Economic Law; Royal Decree of 4 April 2003).

### **Is your data passed on?**

These campaigns are sent via a service provider, to whom we send your email address in order to carry out the sending.

### **What is the retention period?**

We keep your data for as long as you remain a customer of STIB-MIVB. In each communication you have the possibility of objecting to future communications.

### **2/ What purpose?**

Sending the newsletter by email

### **What data?**

- Identity data: surname, first name
- Email address
- Language

### **What is the justification?**

This purpose is based on STIB's **legitimate interest** in collecting and processing data concerning the users of social networks (only in the context of consultation of/interaction with the STIB page). These processing operations are carried out under the joint responsibility of STIB and the social networks.

### **Is your data transmitted?**

Public exchanges and publications are likely to be accessible, due to their presence on social networking platforms, outside the European Union. The data necessary for the compilation of statistics may be processed outside the European Union in accordance with the data management policy established by the head of each platform.

### **How long can the data be kept?**

The data is kept for the period during which the account exists on the social network in question.

*NB: To exercise your rights (see above), you can contact the social network in question directly. For more information, see their data protection/privacy policy.*

### **3/ What is the purpose?**

- Management of STIB's pages on social networks

### **What data?**

Data visible by default on the platforms:

- surname and first name or pseudonym
- profile photograph or avatar
- introductory message
- publications
- messages exchanged
- data made public by the user as part of his general settings on the platform concerned data on the use of the platform for the production of anonymous statistics
- 

### **What is the justification?**

This purpose is based on STIB's **legitimate interest** in collecting and processing data concerning the users of social networks (only in the context of consultation of/interaction with the STIB page). These processing operations are carried out under the joint responsibility of STIB and the social networks.

### **Is your data transmitted?**

Public exchanges and publications are likely to be accessible, due to their presence on social networking platforms, outside the European Union. The data necessary for the compilation of statistics may be processed outside the European Union in accordance with the data management policy established by the head of each platform.

### **How long can the data be kept?**

The data is kept for the period during which the account exists on the social network in question.

*NB: To exercise your rights (see above), you can contact the social network in question directly. For more information, see their data protection/privacy policy.*

### **4/ What is the purpose?**

- Organisation of competitions

STIB processes the data of competition entrants to ensure the smooth running of the competition.

### **What data?**

For this purpose, we only process contact data in order to inform the data subject of the competition results.

### **What is the origin of the data?**

You provide the data yourself in order to participate in the competition.

### **What justification?**

The processing of this data is based on **the execution of the contract for contests**. You have the possibility to participate in these contests or not.

### **Is your data transmitted?**

Participation takes place by using the use of a platform developed by a service provider that has access to your data.

### **How long can the data be kept?**

We keep the data for a maximum of three months after the winner(s) has/have been declared.

### **Retention period**

We keep the data for a maximum of three months after the winner(s) has/have been declared.

## **17- Websites**

The use of the website and apps collects data in 3 circumstances, the main one being the creation of a digital account (allowing you to purchase and manage your transport tickets via MyBOOTIK or the mobile app). Personal data is also

collected for **Open Data** (a system that allows you to obtain data relating to the STIB-MIVB transport network) and for the STIB Store (a website where you can buy STIB-MIVB related goods such as tram reproductions, etc.).

### **1/ What purpose?**

Creation of a digital customer account and addition and/or deletion of MOBIB cards linked to this account.

### **What data?**

In the MyBOOTIK portal, we ask you to fill in the following information:

- title
- language code
- name
- first name
- email address
- mobile phone number
- date of birth
- password

Additional information is collected when you link your account to a MOBIB card:

- the MOBIB card number
- full address
- national registry number
- the right to receive special rates
- the right to enjoy the provision of disability services
- household composition.
- geolocation data (can be disabled)

To keep the data up to date, for example when you move or change your email address, we ask you to change the profile data in your MyBOOTIK account.

### **What is the justification?**

The processing is based on consent. You can delete your digital account at any time.

### **What is the origin of the data?**

We process the personal data that you provide to us when you create your profile in MyBOOTIK and electronically (for example, when linking your MyBOOTIK account to your MOBIB card).

### **Is your data transmitted?**

When necessary for our service provision, some of our databases are made available to third parties who are working on our behalf and assisting us in providing our products and services. An example of this are the IT tasks (IT Support).

### **How long can the data be kept?**

We keep this data as long as you have not deleted your account and it is active.

### **2/ What is the purpose?**

Open data:

- Creation of user profiles;
- Provision of a platform for accessing, sharing and exchanging data and datasets between users;
- Provision of APIs for access to data sets;
- Supervision of the application and of any use of the information, legitimate and/or illegitimate, including ally measures to prevent fraud;
- Production of visits/downloads statistics.

### **What data?**

- first name
- last name
- email address
- encrypted password
- IP address
- other business contact information
- company
- country
- type of access granted

### **What justification?**

The processing of this data is based on the execution of the licence contract for the use of the Open Data platform between you and STIB-MIVB, and on the legitimate interest of STIB-MIVB to oversee the respect of the licence conditions for re-use in order to avoid fraud and to produce statistics.

### **What is the origin of the data?**

You provide this information when you register on the Open Data platform.

### **Is your data transmitted?**

Our Open Data platform is hosted by a service provider, which manages the personal data you provide.

### **What is the retention period?**

We keep this data for a maximum of 1 year.  
service providers. In addition, our online sales service is managed by a subcontractor.

### **4/ What is the purpose?**

- Use of cookies  
Cookies may be placed on your device if you use the STIB website. All the information on cookies is contained in the "cookie policy" section.

## **18- Mobile Application**

### **What purpose?**

The main purpose of the personal data processing in the app is to optimise the transport options in order to make them relevant for the user. The aim is providing a service which is adapted to the habits, location and preferences of the user.

This personalisation will be provided through:

- informative messages (e.g. network disruptions or other relevant information pertaining to the searched itinerary),
- communications (e.g. in case of a station being evacuated),
- own marketing actions: promoting STIB-MIVB products

### **What data?**

Creating an account implies the processing of the following data:

- E-mail address
- Name, first name,
- Title,
- Date of birth

### **When the account is created using an e-mail address:**

- + STIB-MIVB password

### **When the account is created using a Facebook ID**

STIB-MIVB offers the user the possibility to connect to the service through their Facebook access (the "Facebook Connect" option). Facebook Connect is a service from the social network Facebook, which is exploited by the



Facebook Inc. company (1601 S. California Ave, Palo Alto, CA 94304, USA (“Facebook”). In that case, additional registration with STIB-MIVB is no longer required. When creating an account, the user is redirected to the Facebook website where they can register using their user data. As a result, the Facebook ID and the STIB-MIVB service are linked.

The personal data from Facebook (first name, family name, e-mail address and date of birth) are exchanged in order to fill the fields in advance during the account creation. These personal data are stored and processed in the same way as for an account created with an e-mail address.

Facebook does not give nor process any other data (not even the password).

STIB-MIVB has no intention of, in the future, exploiting any other information in possession of Facebook on the user’s account in the mobile application.

#### **When the account is created using an Apple ID (only available in the iOS version)**

STIB-MIVB offers the user the possibility to connect to the service through their Apple access (the “Sign in with Apple”). Sign in with Apple is a service from Apple Inc. (One Apple Park Way, Cupertino, CA 95014, USA). When creating an account, the user is redirected to a screen where they can register using their user data. As a result, the Apple ID and the STIB-MIVB service are linked.

The personal data from Apple (general or hidden e-mail address) are exchanged in order to fill the fields in advance during the account creation. These personal data are stored and processed in the same way as for an account created with an e-mail address.

Apple does not give nor process any other data (not even the password).

STIB-MIVB has no intention of, in the future, exploiting any other information in possession of Apple on the user’s account in the mobile application.

#### • Favourites

- Any point of interest, contact point, public address, line, or stop that the user enters manually and voluntarily through their favourites screen.
- The favourites can be referred to with a name chosen by the user, either from a predefined list or freely.
- The aim is to offer the following features in the app:
  - a fast itinerary search, without needing to enter all the settings manually for each request, to the places the user visits the most, through “address” favourites;
  - a direct access to the line details or the waiting time at the stops (real time) through the “line” or “stops” favourites.

#### • Recently searched places

- Places searched during an itinerary request, whether these are starting or destination points.
- The aim is to display these places first in the app screens.

#### • Itinerary searches in the future with notification

- All the settings of an itinerary, when it is set in the future: its starting point, its destination, the transport modes and the requested operators, the departure or arrival date and time, as well as how long in advance the user wishes to be notified before their departure.
- The aim is to allow STIB-MIVB to send a notification within the requested timeframe in order to inform the user when to leave and follow an itinerary.

#### • Frequently used lines

- STIB-MIVB lines which are searched using the app, after searching an itinerary and having actually taken the recommended route.
- The aim is to provide the user with the most relevant information compared to their search or use habits, to a specific moment of the day, to a weekday, and to the frequency of use of certain STIB-MIVB lines.

#### • Visited places

- The places visited and stored during a journey (step by step).
- The aim is to display these places first in the app screens.

The app first displays filtered information based on the use habits, the user's location or the moment of the day or week.

STIB-MIVB could use the collected information for its own direct marketing purposes or its partners' (i.e. for instance relevant promotions based on the user's habits and location) as long as the user has given their prior consent to do so. In the event a user decides to use the app without identification, no personal data will be stored in the STIB-MIVB databases (not even the mobile terminal login). The mobile terminal login is used to generate a safety measure which allows STIB-MIVB to guarantee that the services are used by a mobile terminal and not by an unknown or malicious system.

The language preferences of the app and the language of the stop names are stored on the mobile terminal.

### **What is the data collection purpose?**

If you wish to benefit from optimised transport options, the processing of your personal data takes place upon your consent. A consent is indeed requested in order to manage the permissions you grant STIB-MIVB (settings). Your consent can be withdrawn at any moment, either by deleting the app or by editing the permissions in the app settings.

### **Where do the data originate from?**

Setting options are only available after creating an account. You will find more information on this matter on the following link <https://www.stib-mivb.be/privacy?!=en>.

The personal data we process is the data you provide when selecting the permissions in the app settings.

### **Is your data transferred to third parties?**

We do not transfer data to third parties unless you give your consent. Some of your profile data could only be transferred to our partners in the event that you have given your consent for receiving communications from STIB-MIVB partners.

### **What is the retention period?**

- In the specific case of the app, the following retention periods apply depending on the kind of data:
  - Favourites: during the active life of a user account, the lifespan is determined by the user themselves, who can choose to delete either favourites directly in the app or their account through MyBOOTIK on our website ([www.stib-mivb.be](http://www.stib-mivb.be)).
  - Recently searched/visited places: the last 30 searched places, since the purpose of the app is to help the user to launch a new itinerary search to a searched place, with a time limit of 18 months maximum, in order to maintain the seasonal or annual habits of an occasional STIB-MIVB user.
    - The user themselves can, at any moment, either delete recently searched places directly in the app, or delete their account through MyBOOTIK on our website ([www.stib-mivb.be](http://www.stib-mivb.be)).
  - Frequently used lines: 18 months in order to detect the periodic habits (seasonal, annual, etc.).
    - The user themselves can, at any moment, either delete frequently used lines directly in the app or delete their account through MyBOOTIK on our website ([www.stib-mivb.be](http://www.stib-mivb.be)).
  - Itinerary searches in the future with notification: until the moment the departure notification for this itinerary is sent.

## **19- Movebrussels app (pilot project)**

STIB-MIVB has developed a MaaS application, named MoveBrussels, as part of a pilot project. This pilot project aims to provide a platform that promotes multimodal and intermodal journeys. The pilot project participants can thus choose the best combination of mobility options in the Brussels-Capital Region

### **For what purposes and on what grounds?**

As part of the MaaS MoveBrussels pilot project, STIB-MIVB processes your personal data for the following purposes:

<b>Purpose of the collection of personal data</b>	<b>Legal basis for processing your personal data</b>
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<p><b>Offering the most appropriate mobility combination depending on the geolocation and/or the preferences of the pilot project participants</b></p>	<p>STIB-MIVB uses the information about your location and routes and/or your search history to provide navigation services, best routes, traffic alerts, etc.</p> <p>The geolocation data is only used with your <b>consent</b>.</p> <p>You may withdraw your consent at any time. In that case, you will no longer receive mobility proposals based on your location.</p>
<p><b>Selling STIB-MIVB transport tickets and registering the STIB-MIVB season ticket</b></p>	<p>STIB-MIVB will use your personal data to process your STIB-MIVB transport ticket purchases and your payment transactions safely and efficiently. Similarly, STIB-MIVB will, if necessary, use the data relating to the validity of your season ticket.</p> <p>This processing is based on the <b>public interest mission</b> which has been entrusted to STIB-MIVB in a regulatory manner, namely the provision of public transport in the Brussels-Capital Region.</p>
<p><b>Managing the participants' panel and communicating with the users for participating in the pilot project assignments</b></p>	<p>The processing plans a profiling in order to segment the participants of the pilot project. This segmentation enables us to send out messages about specific assignments to be carried out in function of the determined profile.</p> <p>This processing is based on <b>the legitimate interest</b> of STIB-MIVB to successfully carry out the participation in the pilot project.</p>
<p><b>Direct marketing: sending out newsletters and participation requests for satisfaction surveys</b></p>	<p><b>The legitimate interest</b> of STIB-MIVB in collecting and processing data on the participants in the pilot project in order to inform them about its activities and to rate their satisfaction.</p> <p>Your <b>consent</b> may be required in accordance with the specific rules on email advertising. You may withdraw your consent at any time.</p>
<p><b>Providing technical assistance and support</b></p>	<p>STIB-MIVB may use your personal data to provide you with technical assistance or support and to process your requests and any complaints you may have.</p> <p>This purpose is based on <b>STIB-MIVB's legitimate interest</b> in processing personal data of the pilot project participants since, without this, STIB-MIVB is unable to process the incoming requests and/or questions.</p>
<p><b>Carrying out market research and segmented data analyses, compiling statistics to improve knowledge about mobility and to develop new products.</b></p>	<p><b>The legitimate interest</b> of STIB-MIVB in collecting and processing anonymised data regarding the app use and the various mobility options offered in order to improve mobility within the Brussels-Capital Region.</p>

### Which data?

STIB-MIVB processes and collects various types of data in order to achieve the above-mentioned purposes. This data can be collected directly from you upon registration for the MaaS pilot project or on the app, but also indirectly when you use the app.

This concerns the following types of data:

- Identification data (surname, first name, gender, age, language)
- Contact data (email address)
- Socio-demographic data (postal code, level of education, professional activity, number of family members, number of children under 12 in the family)
- Mobility data (preferred locations, accessibility problems, possession of a driving licence, possession of a MOBIB card, STIB-MIVB customer number, current mobility solutions, frequency of use by type of transport mode, travel times, reimbursement of travel costs)
- Metadata (information about your device, browser and use of the app)
- Financial data to enable the purchase of transport tickets
- Geolocation of the pilot project participants

**With whom do we share your data? Will your data be transmitted abroad?**

We may share your personal data as part of our activities. In this way, we ensure optimal protection at all times.

Participation in the pilot project and delivery of the app are carried out via an external service provider, which hosts all the data listed under point 3.

Payments via the app go through a payment service provider, which thus has access to your bank details in order to make the payment.

We do not transfer any of your personal data outside the European Union or sell it to third parties.

**What is the retention period of the data?**

We keep this data for a maximum of 28 months after your registration for the pilot project.

**20- Creation of statistics, market surveys and polls**

STIB carries out **surveys** and **analyses** of its users in various ways in order to adapt supply and demand as much as possible and monitor its service. To improve our service, we need to be able to evaluate it through **market surveys, market analyses, reports and statistical analysis**. This evaluation also enables us to pursue a target group policy and apply price differentiation. The information we obtain from certain analyses is used internally to evaluate our current portfolio of products and services as well as our processes and to adapt them on the basis of new developments. Finally, according to the terms of our management contract with the Brussels-Capital Region, we must have the information required for the annual evaluation reports. The report consists of a systematic evaluation of the commitments and objectives of the Parties, and thus of STIB. **The results of these analyses and reports do not contain any personal data.**

In addition, STIB regularly conducts satisfaction surveys and customer surveys to gain a better understanding of its customers' needs and priorities, evaluate changes and constantly improve the service offered to customers. The results of its surveys are directly anonymised.

**What data?**

STIB may use all the data it has about its customers in order to carry out the above-mentioned analyses. This includes, for example, the data contained in the customer database, ticket usage data, etc.

**What is the justification?**

The analyses are part of the **task of public interest** entrusted to STIB.

For satisfaction surveys and polls carried out with your participation, the data is processed on the basis of your **consent** (participation on your initiative).

**What is the origin of the data?**

We collect this data throughout your relationship as a STIB user. It may also come directly from you during field investigations.

**Is your data transmitted?**

Does STIB use subcontractors to carry out such surveys?

In addition, within the terms of the management contract, we sometimes send reports and analyses to the Government of the Brussels-Capital Region.

**How long can the data be kept?**

The reports on the studies and market analyses do not contain any personal data. In this respect, no maximum retention period has been set.

**21- Responding to requests from the competent authorities**

The competent authorities ask us for information in the context of ongoing police and judicial investigations. This may involve all the data we have about one or more customers, such as validations, surveillance camera footage, etc. This data disclosure is part of a legal obligation.

**Table of amendments to the Declaration as of the update of 25/04/2020**

<b>Date:</b>	<b>Modification:</b>
08/07/2020	Insertion of processing 2: use of the MoBIB card: validation on the STIB network
31/07/2020	Insertion of processing 3: "Payment by credit card (EMV)."
09/11/2020	Insertion of processing 13 : "Passenger flow management"
05/01/2021	Insertion of processing 16 : "Mobile Application" Insertion of processing 17 : MoveBrussels Application (pilot project)
05/02/2021	Specification on processing 12 "Management of Cameras"
16/03/2021	Insertion of processing 6: "Transport the the vaccination centers" (temporary processing)
30/03/2021	Insertion of processing 14 "Reporting potential risks with analytic cameras"
21/01/2022	Specifications on processings : 6-16-17