

PRIVACY NOTICE – COMPETITION ENTRANTS

1. Who does this privacy notice apply to, and what is it about?

This privacy notice applies to you if you enter a competition organised by us or on our behalf.

This privacy notice, together with our cookies policy, explains what personal data we collect about you and what we do with it. It also explains your rights in respect of your personal data and it informs you what to do if you have any questions or complaints about our use of your personal data.

2. Who is the controller of your personal data?

The National Express group company established in the UK that organises the competition that you enter is the controller of your personal data that is processed for the purposes explained in this privacy notice.

This will be either National Express Limited (in relation to UK coach competitions), West Midlands Travel Limited (in relation to West Midlands bus related competitions) or Tayside Public Transport Company Limited (in relation to Dundee bus related competitions).

The data controller's representative for the purposes of this privacy notice is the National Express UK Data Protection Officer, who can be contacted using the contact details set out at the end of this notice.

3. What personal data do we collect about you, and how?

We collect the following types of personal data about you:

- your name and title;
- your address, including postcode and country of residence;
- your contact information, including telephone number and email address; and
- your image and/or your voice in photos and/or videos we take for publicity purposes if you are successful in competitions you enter.

We collect this information about you by you providing it to us or to third parties who assist us in running competitions when you enter our competitions.

In addition, each time you visit our website we may automatically collect the following information:

- technical information including web usage information (e.g. IP address), browser type and version, time zone setting, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URLs) clickstream to, through and from our Website (including date and time); tickets and/or journeys you viewed or searched for; time on page, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page.

Please see our cookies policy which is available on our website for more information in this regard.

4. What do we do with your personal data, and on what basis?

We process your personal data to enter you in our competitions and to inform you about the outcome of our competitions. If you are successful in any of our competitions, we also process your personal data in order to award you with the relevant prizes and take publicity photos and videos.

We process your personal data on the basis of our legitimate interest, which is to be able to run and manage our competitions that you enter. You have the right to object to our use of your personal data. However, we do not have to stop processing personal data where we

have compelling grounds that override your interests, or where we need to process your data in order to establish, exercise or defend legal claims. If you have any objections please contact the National Express UK Data Protection Officer (see details below).

5. What if we have obtained your consent to use your personal data?

If we process your personal data on the basis that we have obtained your consent to do so (which is likely to be for a purpose that is not described in this privacy notice) you may withdraw that consent at any time and we will give you further information at the time of obtaining your consent on how to withdraw consent.

6. What are our obligations to collect and your obligations to provide personal data?

You have no legal obligation to provide us with any personal data.

However, if you do not provide the information we need, we may not be able to enter you in our competitions and/or to inform you about their outcomes, including by contacting you if you are a successful entrant and awarded a prize.

7. Who will we share your personal data with?

We may share your personal data with:

- other companies in the National Express group of companies;
- our suppliers, sub-contractors and business partners who help us organise competitions and award successful entrants with the relevant prizes;
- our legal and professional advisors;
- government bodies and regulatory authorities, including the Police and other crime prevention and detection agencies and the UK Information Commissioner's Office;
- the courts and other dispute resolution arbitrators and mediators, other parties to legal proceedings and passenger transport watchdogs; and
- other companies that take on any part of our business as a result of a restructure, merger or transfer of that part of our business.

There may be occasions where it is necessary for us to transfer the personal data we collect about you to a country outside of the European Economic Area ("EEA"), including where our suppliers or subcontractors who process your personal data on our behalf are based in such a country. It is possible that the country concerned may not be deemed to provide a similar level of protection for individuals' rights in relation to their personal data as in the EEA. Where that is the case, we have entered into appropriate contracts with such data processors, based on the standard contractual clauses approved by the European Commission, a copy of which can be found here: <http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32010D0087>, such that your personal data should be afforded the same level of protection as when it is processed in the EEA.

8. For how long will we process your personal data?

We will process the personal data for as long as the relevant competitions that you enter are open and for so long thereafter as is necessary for us to manage the outcome of those competitions.

Typically, we will retain information about you if you are a successful competition entrant for up to 18 months after the close of the competition or if you are an unsuccessful competition entrant for up to 6 months after the close of the competition. A longer retention period will apply for any competitions that we organise on an annual basis and your successful entry in the prior year may be promoted in relation to the next year's competition.

We may also need to retain information about you for longer where any complaints are made or claims arise in relation to our competitions, or your participation in them, or otherwise where we are required by law, regulation or the rules or orders of courts to retain information for longer.

9. What rights do you have in relation to your personal data?

You have a number of rights in relation to your personal data. These include the right, subject to exceptions, to:

- access your personal data;
- request the rectification or erasure of your personal data;
- request restrictions on the processing of your personal data; and
- object to our processing of your personal data.

Please contact the National Express UK Data Protection Officer if you wish to exercise any of these rights.

You also have the right in some circumstances to receive a copy of your personal data in a portable format. This right is limited to personal data that you have provided to us and is processed on the basis of your consent or any contract with us. It does not cover personal data that we process on other grounds. As we process your information on the grounds of legitimate interest, this right will not apply to you.

10. What should you do if you have any questions or complaints?

If you have any questions or complaints about how we process your personal data, you should contact the National Express UK Data Protection Officer at:

- address: Data Protection Officer, National Express, National Express House, Birmingham Coach Station, Mill Lane, Digbeth, Birmingham B5 6DD

or

- email address: data.protection@nationalexpress.com

You also have the right to complain to the UK Information Commissioner's Office about how we process your personal data. You can do this by contacting them on their helpline: 0303 123 1113.