

Solent Transport Privacy Notice for Mobility Credits

Solent Transport represents a partnership between the councils of the Isle of Wight, Hampshire County, Portsmouth City and Southampton City.

Solent Transport is delivering a Mobility Credits scheme which will provide a monthly value of travel credit via a Breeze Voucher to participants, to be used to purchase transport services through the Breeze app.

This Privacy Notice tells you about how Solent Transport collects and uses personal information.

Hampshire County Council, Portsmouth City Council, Southampton City Council and Isle of Wight Council (the Partners) are joint data controllers for the data processed by Solent Transport.

This Privacy Notice should also be read in conjunction with the Partners' privacy policies, which can be found via the links below:

- [Hampshire County Council](#)
- [Portsmouth City Council](#)
- [Southampton City Council](#)
- [Isle of Wight Council](#)

Why do we collect and use your personal data?

Personal data is collected to enable you to apply to participate in the Mobility Credits scheme, to receive Mobility Credits and to provide feedback on your participation.

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How we get your information

We get information about you from the application process, and through the completion of follow up surveys during and post participation.

To receive Mobility Credits via a Breeze Voucher, participants will be required to register an account with the Breeze app. Breeze has its own Privacy Notice which can be viewed [here](#).

What personal data we process and why

The information we process about you will fall within the following categories and is required to process your application, to participate in the Mobility Credits scheme, and to understand the impact of the scheme.

1. From the application process

Your details:

- Full name
- Date of birth
- Address
- Gender
- Ethnicity
- Health condition/disability
- Email address
- Phone number
- Entitlement to Council Tax Support

Information regarding gender, ethnicity and health conditions/disability will be used for research, monitoring, and evaluation purposes, and you can choose whether or not you want to provide us with this information.

2. From use of the Breeze App

Please see the equivalent section in the Breeze Privacy Policy [here](#).

3. From enquiries made to Solent Transport or a Partner Local Authority

- Name and contact details
- Other information that may be required to resolve your enquiry

Lawful basis for processing your personal data

Depending on the service, we rely on the following lawful basis for processing your personal data under the UK GDPR:

1. For processing your application

Article 6(1)(a) – you have given us your consent to process your details (see above).

Article 6(1)(b) Contract - the processing is necessary for the delivery of services under the Terms and Conditions of participation in the Mobility Credits scheme

Article 9(2)(a) – We will obtain your explicit consent for any special category data processed

2. For using the Breeze App

Please see the equivalent section in the Breeze Privacy Policy [here](#).

3. For enquiries/Customer Services

Article 6(1)(b) Contract - the processing is necessary for the delivery of services under the Terms and Conditions of participation in the Mobility Credits scheme.

How long we keep your personal data

All personal data will be deleted by 31 May 2025, to allow for completion of the Mobility Credits scheme and associated monitoring and evaluation.

If you formally withdraw from scheme or your participation is cancelled, your personal data will be deleted within one calendar month, but fully anonymised data will be retained to assist with project evaluation.

Please also see the equivalent section of the Breeze Privacy Notice [here](#).

Enquiries

Once an enquiry has been received by Solent Transport, it may be forwarded to the relevant Partner to respond to and action. Customer Services are provided via Southampton City Council which is also the lead Partner for Information Governance.

The personal data will be held in line with the relevant Partner's retention schedule, further details of which can be obtained from them directly.

Data Sharing

To process your application it will be necessary to share your personal data with the local authority from which you receive Council Tax Support, in order to verify your entitlement to Council Tax Support. Please refer to the relevant local authority's Privacy Policy.

For data sharing through the Breeze app, please see the equivalent section of the Breeze privacy notice [here](#).

In some circumstances, we may be legally obliged to share information with other organisations or agencies in order comply with applicable laws and regulations, for

example sharing information with the police for crime prevention purposes.

Do we use any data processors?

Data processors are third parties which provide certain parts of our services for us.

The Partners have contracts in place with them and they process data in accordance with this Privacy Notice and they cannot use the data for any other purpose.

- **Processors** - Our current data processors for this service are listed below.

Data Processor	Purpose	Privacy Notice
TRL	Analysing feedback provided by you in the application survey and follow up surveys.	TRL Privacy Notice
Snap Surveys	To facilitate the on-line application process for the Mobility Credits scheme	Snap Surveys Privacy Notice
University of Southampton	Analysing feedback provided by you in the application survey and follow up surveys.	University of Southampton Privacy Notice
Intuit Platform / Survey Monkey	To facilitate the email sending of the monthly £50 Mobility Credit Breeze Voucher to a Participants email address	Mailchimp Global Privacy Notice
Commify UK Limited trading as TextAnywhere	To facilitate the SMS message sending of the monthly £50 Mobility Credit Breeze Voucher to a Participants mobile phone number	Commify UK Limited Privacy Notice

Please also see the equivalent section of the Breeze Privacy Notice [here](#)

Your rights in relation to this processing

As an individual you have certain rights regarding our processing of your personal data, including a right to lodge a complaint with the [Information Commissioner's Office](#) as the relevant supervisory authority.

These rights include:

- The right of access - You have the right to obtain confirmation that your data is being processed, as well as access your personal information.
- The right to rectification - You have the right to have inaccurate personal data rectified, or completed if it is incomplete
- The right to erasure - You have the right to have all your data erased, also known as the 'right to be forgotten.
- The right to restrict processing - You have the right to request the restriction or suppression of your personal data. This is not an absolute right and only applies in certain circumstances
- The right to object - You have the right to object to processing in some circumstances. The processing must stop unless there is legitimate grounds that override your rights, interests or freedoms, or the processing has been done in regards to a legal claim

To exercise any of these other rights, please contact Solent Transport at hello@mobility.breezeuk.app