

TTA Privacy Management Plan and Policy

This document will be updated as the solution strategy moves into implementation

Revision 1



Table of Contents

Table of Contents.....	1
Privacy Plan and Policy	2
1. Introduction: Privacy issues and new technology	2
2. Information Privacy Law.....	2
3. Personal Information in the New Ticketing Solution (NTS).....	3
4. Privacy protection in the NTS	4
5. Collection of Personal Information (IPP1).....	5
Registration.....	5
Concessions	6
Photographs	7
Smartcard and Cardholder numbers	7
Collection of information from use of the smartcards	7
No ‘Sensitive’ Information	8
6. Use and Disclosure of Personal Information (IPP2)	8
Personalisation - Information on the face of the smartcard	8
Usage information in the central repository	9
Enforcement	9
Access by other third parties	10
Disclosure outside Victoria	10
Legal basis of use and disclosure.....	10
7. Data quality (IPP3).....	10
8. Security (IPP4).....	11
9. Transparency (IPP5).....	11
10. Access and Correction (IPP6).....	12
11. Other uses of the smartcard	12
12. Monitoring and Auditing	13
13. Complaints.....	13
14. Training.....	13
Annex 1: Personal Information to be held by TTA in the New Ticketing Solution.....	14

Privacy Plan and Policy

This plan and policy sets out the proposed approach by TTA to dealing with identified privacy issues, including but not limited to compliance with the Information Privacy Act 2000 (Vic) ('the IPA'). It is largely prospective; ie: looking forward to the time (from 2007) when the New Ticketing Solution is operational. However, some elements of the policy will need to be implemented in advance¹, and having it in place at this early stage should also ensure that protection of any personal information involved in trials or pilots meets both community expectations and legal requirements.

This draft will also form the basis of the privacy policy that TTA will be required to make public under the IPA, once the Solution is operational.

1. Introduction: Privacy issues and new technology

1.1 TTA recognises that under the New Ticketing Solution it will be the custodian of significant amounts of personal information about the travelling public in Victoria. TTA is committed to respecting the privacy of its customers². As well as complying with the applicable law, TTA will seek to give its customers the maximum possible choice and control over the way in which personal information about them is collected and used.

2. Information Privacy Law

2.1 TTA is the Public Transport Ticketing Body, a State owned enterprise established in 2003 by the Governor in Council under the State Owned Enterprises Act 1992, and as such is subject to the Information Privacy Act 2000 (IPA)³. TTA is not subject to the federal Privacy Act 1988.

2.2 The Act will also apply⁴ to any contracted service providers, in relation to their provision of services to TTA, on the basis of the State contract specifying the obligations of the service provider. TTA will ensure that any contracts clearly detail the appropriate privacy obligations. TTA will however stand behind the contractual provisions and will take responsibility for seeking to resolve any privacy complaints that involve the actions of its contractors. Contractors will be required to indemnify TTA for any financial consequences of breaches of the IPA that result from the actions of the contractor⁵.

2.3 The prime contractor for NTS is Kamco (Keane Australia Micropayments Consortium). Unless expressly varied, references in this Plan & Policy to 'contractors' mean Kamco, its partners and any subcontractors.

¹ For instance to deal with personal information collected in relation to public enquiries.

² This policy relates only to the privacy of members of the public (primarily public transport customers) under the New Ticketing Solution. Separate policies apply to TTA's handling of personal information about its staff, agents and contractors.

³ S. 9(1)(e), IPA

⁴ S.9(1)(j) and s.17, IPA

⁵ Under the IPA, the VCAT can award compensation of up to \$100,000 (s.43).

- 2.4** Contractors may have separate but similar obligations under the private sector provisions of the federal Privacy Act 1988, in respect of any personal information they control themselves. But in relation to information handled under a State contract the Victorian IPA will prevail⁶.
- 2.5** TTA is also subject to the Surveillance Devices Act 1999 (Vic) (see 5.22).

3. Personal Information in the New Ticketing Solution (NTS)

- 3.1** The NTS is potentially more than just a public transport ticketing solution – it is a payment system, the initial usage of which will be for public transport tickets, with the prospect of use for other transit related purchases such as major events and car-parking. The smartcard could also be used for micropayments (i.e. other small value purchases), although whether this capability is activated is a policy decision for the government.
- 3.2** Under the NTS, most tickets on participating public transport will take the form of ‘smartcards’ – typically paper or plastic cards containing a computer ‘chip’ which will store information and/or ‘value’ and be read at a short distance by a variety of smartcard readers, installed in and around the public transport system. There may still be some ‘dumb’ paper tickets used on some modes of transport.
- 3.3** For travel and other payments, customers will have the choice of using ‘anonymous’ smartcards (disposable cards for single trips or re-usable smartcards). They can however choose to ‘register’ a smartcard⁷ – this will involve the supply of some personal details to TTA as the issuing authority. These details will be held in a separate repository along with the identification numbers of any smartcards held by that individual that they have chosen to register in their name.
- 3.4** Registration will not necessarily imply personalisation of the card (printing of personal details on the face of the card) although this will be an option for full fare smartcards and will be mandatory for most classes of concession smartcards.
- 3.5** Cardholders may be able to have their smartcard enabled as an electronic pass – similar to existing period or season tickets. But they will also be able to ‘load’ monetary value on to an electronic purse facility on the smartcard. This can be used to purchase travel on public transport (and/or potentially, other goods or services – see Section 11).
- 3.6** Passengers entitled to a travel concession (several categories) can either register to obtain a concession enabled smartcard, or if they wish to travel anonymously, purchase a full fare

⁶ By virtue of the exemption in s.7B(5) of the PA, unless the service provider adopts a Code of Practice under the federal Privacy Act and is also, consequentially, expressly exempted from the IPA by a Victorian law.

⁷ The advantages of registration, which will be promoted, include the protection of any remaining value in the event of loss or theft of the card – see 5.4.

smartcard and not register it. There will also be an option for all classes of concession to use disposable anonymous concession cards⁸.

- 3.7** Passengers entitled to a free pass (several categories) will, if they wish to claim this entitlement, have to register and obtain a personalised smartcard. If they wish to travel anonymously they will have to purchase full fare smartcards (either disposable cards or smartcards which they do not register).
- 3.8** The TTA's computer systems will hold in a central repository details of the transactions performed with each smartcard.
- 3.9** It follows that the TTA will have the capability to link smartcard usage history data with customer registration data to form a record of individuals' travel patterns (for those customers who are registered).
- 3.10** The smartcard usage history information will be personal information under the IPA even though the personal details are to be held in a separate repository, as TTA will have the ability to link them via the smartcard number.
- 3.11** TTA will also collect and hold personal information in relation to some enquiries from the public about the NTS⁹ and in relation to promotional and marketing activities.
- 3.12** The different categories of personal information to be held by TTA are illustrated in Annex 1.

4. Privacy protection in the NTS

- 4.1** Privacy protection will be provided either as a design feature or incidentally by the following features of the NTS. This list is a summary only and more detailed explanation is given later.
- The option of anonymous cards – both disposable full fare cards and unregistered full fare smartcards - will be available. Anonymous disposable concession cards will also be available through some outlets;
 - The option of holding multiple smartcards, although this will not be actively promoted;
 - Limited personal information stored on the smartcard chip;
 - No 'meaning' in the smartcard number;
 - Holder choice of whether their name and/or photograph are displayed on the face of the smartcard, for holders of full fare smartcards. Personalisation is likely to be mandatory for some concession and all free pass holders;

⁸ Disposable concession cards are likely to be available only from a restricted range of outlets

⁹ Persons making enquiries will generally be able to do so anonymously, but may volunteer personal information which may be recorded with the individual's consent, for instance to facilitate the provision of further information.

- Separate repositories of smartcard use history (public transport scan-on/off and any purchases), registration/concession details, and payments;
- Limits and conditions on linking the three repositories;
- A facility for a holder to request suspension of the ‘functionality’ of the smartcard for periods when they do not need to use it;
- Limits on who can read smartcards, how, when and for what purpose;
- Auditability and traceability of database access and
- Specified data retention periods.

4.2 The way TTA will ensure compliance with the Information Privacy Principles (IPPs) of the IPA is set out below. In many cases TTA’s policy goes beyond minimum compliance and offers additional privacy protection.

5. Collection of Personal Information (IPP1)

5.1 TTA will only routinely collect personal information necessary for the operation of the ticketing system and, if the Cardholder chooses, the electronic purse (t-purse) facility. Some personal information may also be collected from individuals making enquiries or complaints.

5.2 No information will be collected from purchasers of disposable smartcards or of full fare smartcards which they do not wish to register, other than whatever information may be required in relation to the method of payment and/or delivery. This will satisfy both IPP1 and IPP 8 (Anonymity).

5.3 Payment information, where required, will be no different from that involved in the purchase of any other goods or services and in most cases – for example where payment is by cash, credit card or debit card – will not be stored by TTA in a way which can be linked to usage history data of the individual smartcard. The exception is where holders opt for an ‘auto-reload’ facility paid by direct debit, which will require records linked to smartcards, via the Customer Record.

Registration

5.4 Cardholders choosing to register¹⁰ will have to provide a name and contact details, including as a minimum a postal address. There will be no particular integrity standards for contact details, and holders will for example be able to use any address – although it is in their own interests to be readily contactable and for there to be no dispute over their identity. Those registering will be able to choose whether to give telephone, fax or email addresses as additional means of contact.

¹⁰ Registration confers certain benefits – both the convenience of auto-load, and security – registered holders will be able to claim the balance of any value on lost or stolen cards, subject to certain conditions. TTA will be promoting registration and hopes to have a significant proportion of cards registered.

Concessions

- 5.5** Many individuals will be entitled to concession travel, and some individuals will have eligibility for more than one class of concession. Concessions may involve discounts, free travel on certain days or, potentially, other benefits. Entitlement for concession travel and the resulting benefits are determined by government and will not be within the control of TTA, although consultation would be expected on any proposed changes.
- 5.6** The New Ticketing Solution has to accommodate a range of concession types and benefits, and it is part of TTA's responsibility to ensure that the system design minimises the potential for abuse or administrative errors in concession management. This includes a responsibility to check the entitlement of those to whom concession smartcards are issued, both on application and subsequently. While some concessions will remain in effect indefinitely once issued (eg: seniors), others will be dependent on the person's status (eg: student), and will therefore expire.
- 5.7** Registration as a concession Cardholder will involve the applicant giving additional information about their eligibility, and, potentially, their consent for TTA to carry out verification with relevant source agencies. Details of these verification arrangements have yet to be developed. In the longer term, they are likely to involve automated data-matching with source databases¹¹. There will be written agreements with source agencies to cover data quality standards and procedures in the event of verification indicating a lack of eligibility¹².
- 5.8** Arrangements will vary with the type of concession. Some will require evidence of eligibility to be produced at the point of application for a smartcard, which could be at a range of different outlets, including selected retail outlets.
- 5.9** The NTS will provide concession fares by means of smartcards which are flagged with a concession status when issued. For administrative and enforcement reasons, some concession smartcards may also be distinguished visually from full fare smartcards, but there will be only limited distinction between classes of concession (details can be read if required from the central registration repository, or perhaps from the smartcard chip). The disclosure of information about the Cardholder as a consequence of the use of the smartcard is therefore limited. The contact less nature of the technology in any case means that there will be no routine requirement to show or display the smartcard in normal use¹³.

¹¹ Centrelink already has such an arrangement with other agencies, and discussions with them about verifying public transport concessions are in progress.

¹² Some source agencies may independently require compliance with data-matching guidelines - for example, Centrelink and the Commonwealth Department of Veterans' Affairs have adopted the federal Privacy Commissioner's *Guidelines for Data-matching in Commonwealth Administration.1998*.

¹³ Cards can be read through material, so they need not be removed from wallets, purses or pockets in normal use.

Photographs

- 5.10 Some concession smartcards will have a photograph of the holder printed on the face of the smartcard, to aid checks by authorised officers to prevent abuse. Photographs will be an optional personalisation feature for full fare Cardholders who choose to register. See below under Personalisation.
- 5.11 Where a photograph is required or requested, no copy or record of the image will be kept once the smartcard has been printed (except for a small number of cardholders with special needs, with their consent), and no details of the image will be recorded on the smartcard chip.

Smartcard and Cardholder numbers

- 5.12 Each smartcard will have a number, but this will be purely for administrative purposes and the number will convey no information about the Cardholder. The smartcard number will be stored on the smartcard chip, and will also be printed on the smartcard to facilitate enquiries – for instance when lost or stolen smartcards are reported. (Does this need to specify registered/personalised cards?)
- 5.13 Cardholders who register will be allocated a customer record number for administrative and customer service purposes. The smartcard number cannot be used for these purposes as each individual smartcard will have its own unique number, whereas a Cardholder may hold more than one smartcard either simultaneously and/or over time.
- 5.14 A Customer Record will hold against each customer number the numbers of any smartcards registered to that Cardholder (see Annex 1).
- 5.15 Smartcard numbers will not be unique ‘identifiers’ as defined in the *Information Privacy Act* and subject to the additional requirement of IPP7.1. Customer record numbers will be ‘identifiers’ but can be justified on the basis of the requirements of efficient ticketing administration.

Collection of information from use of the smartcards

- 5.16 Use of the Smartcards on public transport will result in the capture of information about the particular trip or journey – both origin and destination and date and time. Use of the electronic purse (t-purse) facility to purchase other goods or services (if implemented) would result in capture of limited information about the ‘merchant’ which may also convey location and/or the general nature of the transaction. The number of usage transactions stored on the smartcard itself will be limited. For customers using their smartcards regularly, up to seven days worth of smartcard usage transactions will be stored on the smartcard itself, with a periodic ‘upload’ to the TTA’s central computer system for a variety of purposes described in 6.3.
- 5.17 The Smartcards will be ‘contactless’ and are designed to be read within a few centimetres of an authorised smartcard reading device. There will be a technical limit to the distance at which a card can be read. The system will be designed to allow only authorised devices to read the smartcards.

- 5.18** In the unlikely event of an unauthorised reading of the smartcard, no personally identifiable information would be obtained, although if the holder had chosen personalisation (name and/or photo on the smartcard – see below), then a person obtaining unauthorised access to information on the smartcard chip who was also in possession of the smartcard itself could obviously link these details. TTA considers that the limited amount of usage information held on the smartcard chip makes this an acceptable risk.
- 5.19** Merchants accepting payments for other goods or services by means of a smartcard (if it is decided to implement this option) would be authorised to read the smartcards, but only to record the smartcard number for subsequent reconciliation and payment. They would not be able to read any of the TTA information on the smartcard, including details of travel, for their own purposes, although some merchants may be contracted to respond to value balance enquiries, in which case their equipment would need to have this functionality.

No 'Sensitive' Information

- 5.20** TTA will not routinely collect any personal information in the categories specifically defined in the *Information Privacy Act* as 'sensitive', and the additional controls in IPP10 do not therefore apply. Some sensitive information may be volunteered by individuals in the context of enquiries or complaints, in which case the 'express consent' basis of IPP10 would apply.
- 5.21** If the electronic purse facility on the smartcard is allowed to be used for the purchase of health services or products, the requirements of the *Health Records Act 2001* will be considered.
- 5.22** Compliance with the Surveillance Devices Act 1999 will be through implied consent of cardholders, who will be made aware of the way the ticketing system operates.

6. Use and Disclosure of Personal Information (IPP2)

Personalisation - Information on the face of the smartcard

- 6.1** Cardholders choosing to register full-fare smartcards will be able to choose whether to have their name and/or their photograph printed on the face of the smartcard. Those who choose a photograph, or those concession Cardholders for whom photographs are mandatory, may consider a name to be redundant. Other Cardholders may find it convenient to have their name printed, as this would be the only superficial way of distinguishing between smartcards that do not have a photograph. However, by providing for smartcards without names (or photos) the potential for the smartcard to be requested by third parties as 'evidence of identity', leading to function creep beyond the intended purpose is reduced.
- 6.2** There is a possibility that other organisations may be interested in contracting with TTA for the smartcards to perform other functions. This may involve the smartcards carrying information relating to other products (see s.11 below), but may also just involve the smartcards displaying

some affiliation¹⁴. If this option is pursued, further consideration will be given to the privacy implications, with a likely quarantining of personal information in separate repositories, with strict access controls.

Usage information in the central repository

- 6.3 Information on use of smartcards will be uploaded periodically to a central repository. This information will be retained in a way that can be linked to the registered Cardholders only for as long as it is reasonably needed to answer queries from Cardholders, to reconcile any payments involving other merchants, and for legal reasons. It is understood that there may be a legal requirement to keep at least some information for up to seven years.
- 6.4 Once the information is no longer needed for customer service reasons, it is proposed that it be irreversibly de-identified. This de-identified information may then be used, indefinitely, for transport planning purposes.
- 6.5 Public transport operators, and merchants accepting payments by means of the smartcard, will have no need for personally identifiable information. They may obtain aggregate, de-identified information from TTA for planning and management purposes.
- 6.6 If personal information is to be used for marketing i.e. informing Cardholders of special offers, additional services etc (as opposed to information directly relevant to their existing use of the smartcard), Cardholders will be given the choice of 'opting-out' of receiving any such material.

Enforcement

- 6.7 TTA is not responsible for the enforcement regime to combat public transport fare evasion. This is established by the *Transport Act 1983* (TA) and Regulations under that Act and is the operational responsibility of the Department of Infrastructure's Public Transport Division (PTD).¹⁵ Employees of the operators who are designated as Authorised Officers (AOs) under the TA operate under the TA and rules set by the DoI PTD. AOs exercise powers under the TA to request information from public transport customers (and where necessary detain them).
- 6.8 AOs will be able to read recent transaction history, and concession status, from a TTA smartcard, using a hand-held device. They will also be able, if required, to enter into the device personal details obtained directly from the individual into a record of non-compliance (RONC), reports on which will be sent periodically to the PTD for further action. This function and process will be the responsibility of DOI PTD, not TTA. AOs will not have access to any information, either from the card chip or from the TTA's data repositories, identifying the cardholder.

¹⁴ Examples would be a sports club or commercial business

¹⁵ The Victoria Police Transit Division works with the DOI PTD in relation to enforcement. These paragraphs (6.7-6.9) apply to Transit Police as well as authorised officers. Access to information by police for other purposes is covered by paragraphs 6.10 and 6.11

6.9 The DOI PTD may request information from the TTA's registration or smartcard history repositories, in order to take further action in relation to a RONC. In such cases, TTA will have an obligation, under IPP 2.1, to ensure that the disclosure is either required or authorised by or under law - exception (f), or reasonably necessary for law enforcement (including revenue protection) (exception (g)). A protocol will be agreed with PTD to govern such disclosures.

Access by other third parties

6.10 TTA will only provide personal information about Cardholders to other third parties, including law enforcement agencies, in the following five circumstances:

- where necessary for reasonable operational purposes, e.g. to contractors;
- in connection with the handling of enquiries or complaints;
- if required to do so by law;
- with the express consent of the Cardholder; or
- If it is satisfied that the disclosure is reasonably necessary to lessen or prevent a serious and imminent threat to the life or health, safety or welfare of any individual.

6.11 Disclosures to Victoria Police for purposes other than in relation to fare evasion will be in accordance with established procedures set out in Victoria Police Manual Instruction 111-9 *Information and Assistance from outside organisations*.

Disclosure outside Victoria

6.12 It is very unlikely that any personal information will be disclosed by TTA to someone outside Victoria. If this is required at any time; e.g. in connection with issue of smartcards in neighbouring states, TTA will ensure that it meets the additional requirements of IPP9.

Legal basis of use and disclosure

6.13 All uses and disclosures will be in accordance with IPP 2, typically relying on the grounds of 'consent' 2.1(b), or 'required or authorised by or under law' (2.1(f)). In some cases, uses or disclosures may alternatively rely on the ground of secondary related purpose within the reasonable expectation of the individual (2.1(c)).

7. Data quality (IPP3)

7.1 TTA has an obvious operational interest in any information it holds being accurate, complete and up-to-date, and this coincides with its responsibilities under IPP3.

7.2 TTA will seek to ensure that it meets the data quality principle in four ways:

- By collecting personal information about its customers primarily directly from them, and only from third parties with the customer's knowledge;
- By encouraging cardholders to keep their personal details up-to-date, with easy update facilities through the call centre and website;
- Through rigorous technical standards for the operation of ticketing and other computer systems that collect and processes information about travel, other transactions and payments; and
- By ensuring that individuals are able to access and correct the personal information that TTA holds about them on request (see 10 below).

7.3 Where TTA obtains personal information from third parties – for instance information about eligibility for concessions from source agencies, the relevant agreements will specifically address data quality issues (see under 'Concessions' above).

8. Security (IPP4)

- 8.1** TTA will ensure that the personal information it holds is protected by appropriate security measures, including in relation to computer systems, communications and physical assets, backed up by clear and enforceable confidentiality rules for staff and contractors.
- 8.2** The NTS will make use of cryptographic procedures to ensure that the data stored on a customer's smartcard is secure. A smartcard will only allow access or changes to its stored data if appropriate security conditions are met – a device (for example a fare payment device) will only be able to read a smartcard if both the device and the smartcard have correct and registered security keys (similar to a credit or debit card at an ATM).
- 8.3** Personal information will only be held for as long as it is required for operational purposes, or as required by law. The actual retention periods for different classes of information will be spelt out in this privacy policy in due course. (See Annex 1 for provisional estimates).

9. Transparency (IPP5)

- 9.1** This privacy plan and policy is one important way in which TTA complies with IPP5, and also forms part of its broader communications and public information strategies. While the full policy will be available both in hard copy on request and through the TTA website, there will also be more concise privacy statements on the web-site acting as a summary and introduction to the full policy, and also specifically addressing the collection of information through the web-site itself¹⁶.

¹⁶ TTA will follow the advice given by the Victorian Privacy Commissioner in his Website Privacy – Guidelines for the Victorian Public Sector, June 2004

- 9.2 Appropriate privacy notices or statements will also be provided wherever and however personal information is collected, such as on application forms for smartcards or for direct debit arrangements.

10. Access and Correction (IPP6)

- 10.1 When a Cardholder 'scans-off' from a public transport trip, the device will display information about the charge levied for that trip and the outstanding balance of value on the smartcard (and/or an appropriate warning about insufficient or low value). Cardholders will also be able to use devices at specific locations to read all of the variable information on the smartcard chip – i.e. recent trip history, debits and/or credits.
- 10.2 Cardholders wishing to see their smartcard usage history information over a longer period will be able to do so either by applying to the TTA, or in the case of registered holders, by enquiring on-line through the TTA website, using a password issued to them when registering if they chose online enquiry access.
- 10.3 TTA is subject to the Victorian *Freedom of Information Act 1982* (FOIA) as well as the IPA. Both Acts confer a right of access to, and correction of, personal information, although the FOIA also has wider objectives. Responses to FOIA requests *from third parties* for release of documents which include 'personal affairs' information will be handled with care to protect the privacy of the individuals concerned, using the established FOIA processes for editing or, where appropriate, seeking consent for release.
- 10.4 In accordance with advice from the Victorian Privacy Commissioner¹⁷ TTA has integrated its processes for handling FOIA and IPA requests *from individuals* for access and correction relating to information about themselves.
- 10.5 Access by an individual to all personal information about them held by TTA will be available on request free of charge¹⁸, subject to appropriate evidence of identity and to certain exceptions set out in the IPA and FOIA.

11. Other uses of the smartcard

- 11.1 The electronic purse (t-purse) capability of the smartcard could be used for purchases of other goods or services, either transport related, such as parking, or unrelated (eg: newspapers, soft drinks). Whether this capability is activated is a policy decision for the government. If it is, the other 'merchants' would be 'licensed' to use smartcard readers to debit value from the smartcards – they would not have access to any of the transport related information on the smartcard, or to registration or smartcard history information in the TTA repositories.

¹⁷ Office of the Victorian Privacy Commissioner, *Guidelines to the IPPs Part 2*, August 2002, pp14-18

¹⁸ TTA reserves the right to make a reasonable charge for routine provision of information, such as regular account statements

- 11.2** The smartcard could also provide a platform for other products, as it has the technical capacity to hold other information. Other products could include government services such as library cards, or commercial services such as loyalty programs (other than any TTA loyalty scheme). If such products were allowed, it is likely to be on the basis of a voluntary 'opt-in' by Cardholders, and there would need to be a clear agreement about the extent of any data sharing, and on security to prevent unauthorised sharing.
- 11.3** TTA is committed to further discussion with stakeholders, including the Privacy Commissioner, before any decision is made to allow other products on the smartcards (and if so on what terms), or to allow access to information held by TTA in connection with t-purse payments other than that required for reconciliation of payments.

12. Monitoring and Auditing

- 12.1** TTA will maintain audit logs of access to computer systems sufficient to monitor compliance with access limitations and security. TTA will implement routine reporting and periodic reviews to assess compliance, and will make its records available as required by any properly authorised external regulator including the Privacy Commissioner; the Public Transport Ombudsman and the Victorian Ombudsman.

13. Complaints

- 13.1** TTA will handle complaints about breaches of privacy through its normal customer service channels, but will take any such complaints particularly seriously. Some complaints may involve both privacy and other customer service issues. TTA, with the co-operation of contractors, will endeavour to resolve any privacy complaints speedily and efficiently, in a way that both satisfies the complainant and ensures that any systemic issues are addressed.
- 13.2** Complainants will be advised that they can take a complaint to the Privacy Commissioner at any time and also that they have a right of review by the Victorian Civil and Administrative Tribunal (VCAT) in certain circumstances. TTA will cooperate fully in any investigations or proceedings involving the Privacy Commissioner or VCAT or other regulatory bodies such as the Public Transport Ombudsman and Victorian Ombudsman.

14. Training

- 14.1** TTA will include appropriate modules and information on privacy in staff training, newsletters etcetera, including reminders and updates as the NTS is progressively developed and implemented.

For further information, contact smartcard@doi.vic.gov.au

Annex 1: Personal Information to be held by TTA in the New Ticketing Solution

Data items held	<i>Retention period</i>
On smartcard face	For life of smartcard, invariable
smartcard Number	
Photo (Optional for Full Fare only)	
Name (Optional)	
On smartcard chip	For life of smartcard but all variable except smartcard number
smartcard Number	
E-pass type	
and/or	
T-purse value	
Trip details and value adjustments (7 days)	
+ Concession type & expiry date (if applicable)	
On Card Master Record	Short term – to be specified
smartcard Number	
Type (Full fare or concession)	May also be a separate repository for long term transaction/usage data, with smartcard numbers removed or scrambled to ensure cannot be linked back to individuals
If concession, type of concession	
Trip history (x months)	
E-pass status and history	
T-purse value and history (credits and debits)	

Data items held	<i>Retention period</i>
Data items held	<i>Retention period</i>
On Customer Record	For as long as customer remains registered
Customer Number	
Name	
Address	
Phone No (Optional)	
E-mail (Optional)	
Registered for on-line enquiry (Optional)	
If registered, password	
Concession status	
If concession, type of concession & expiry date	
smartcard number(s) registered	Removed a short time after smartcard no longer in use, so that detail in smartcard history database is de-identified.
Details arising from public enquiries and complaints	Limited period to be decided
On Customer Payment Record (for Direct Debit auto-load)	Financial system standards
Payor name	
Account details	
TTA smartcard number(s)	
Financial transaction history (i.e. debits)	

Held in Financial Management system –	
Payor details from EFT or Credit transactions provided by financial institutions	Financial system standards
Typically payment card type, name, partial card number, expiry date, transaction amount, date and time	
Recorded against TTA smartcard number(s) for which payment is made	