
PRIVACY POLICY



Here you can find all the information about the data processing principles of Tallinna Linnatranspordi AS (hereinafter the TLT).

Under the section “Terms”, you can find detailed definitions of words that are often used in the privacy policy.

1. TERMS

- 1.1 **Data subject** means a natural person about whom TLT has information that can be used to identify a natural person, such as customers, visitors, cooperation partners, and employees about whom TLT has personal data.
- 1.2 **Privacy policy** means the text of this document which lays down the principles for the processing of personal data in TLT.
- 1.3 **Personal data** means any information relating to an identified or identifiable natural person.
- 1.4 **Processing of personal data** means any operation which is performed upon the data subject’s personal data.
- 1.5 **Customer** means any natural or legal person who uses or has expressed a wish to use the services of TLT, including the public transport service.
- 1.6 **Agreement** is a service or any other agreement entered into between TLT and a customer.
- 1.7 **General terms and conditions** set the general terms and conditions that have been developed for the conclusion of an indefinite number of agreements and which apply when entering into a contractual relationship with the TLT.
- 1.8 **Website** means the website of TLT: <https://www.tlt.ee>
- 1.9 **Visitor** means a person who uses the website of TLT or enters the territory of TLT.
- 1.10 **Services** are any services and products provided by TLT.
- 1.11 **The data protection officer of TLT** means a person who monitors the application of the personal data processing principles in the TLT and whom the data subject can contact in the event of a complaint.
- 1.12 **Cookies** mean data files that the website sometimes stores on the visitor’s device.

General provisions provide you information about who the controller of personal data is and when

2. GENERAL PROVISIONS

- 2.1 Tallinna Linnatranspordi AS is a legal person, registry code 10312960, registered address Kadaka tee 62a, Tallinn.
- 2.2 TLT may process personal data:

the privacy policy applies.

- (1) a controller, while determining the purposes and means of processing;
 - (2) as a processor pursuant to the instructions of the controller;
 - (3) as a recipient of transmitted personal data.
- 2.3 The privacy policy applies to the data subjects, and the rights and obligations set out in the privacy policy must be followed by all the employees and cooperation partners of TLT who come into contact with the personal data held by TLT.
- 2.4 This privacy policy of TLT forms an integral part of the agreement and the general terms and conditions entered into between the TLT and the customer.
-

Here you can find the main principles which the TLT always follows and adheres to when processing your personal data.

3. PRINCIPLES

- 3.1 When processing personal data, the TLT will always take into account the interests, rights and freedoms of data subjects.
- 3.2 The objective of TLT is to process personal data responsibly, based on the best practice, with the aim of always being prepared to demonstrate the compliance of personal data processing with the established goals.
- 3.3 All processes, guidelines, activities and actions of TLT related to the processing of personal data are based on the following principles.
- (1) **Lawfulness.** There is a legal basis, such as consent for processing of personal data;
 - (2) **Fairness.** This means in particular that the data subject has sufficient information about how their personal data are processed;
 - (3) **Transparency.** The processing of personal data is transparent for the data subject. Using clear and plain language, it is explained why, how and when personal data are processed;
 - (4) **Purpose limitation.** The personal data are collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with these purposes;
 - (5) **Data minimisation, i.e. keeping the data processing to a minimum.** The personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - (6) **Accuracy.** Personal data must be accurate and kept up to date, if necessary, and all reasonable measures must be taken to ensure that any personal data which are inaccurate with respect to the purpose of data processing are erased or rectified without delay;
 - (7) **Storage limitation.** The personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
 - (8) **Reliability and integrity.** The processing of personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
 - (9) **Data protection by design and by default** TLT ensures that all the systems used meet the required technical criteria. Appropriate

data protection measures have been designed when upgrading or designing any information or data system.

- 3.4 In the processing of personal data, the TLT acts with the purpose of always being able to prove compliance with the aforementioned principles; more information regarding compliance with these principles can be requested from the TLT.
-

Here you can find information on how we collect personal data.

4. CATEGORIES OF PERSONAL DATA

- 4.1 Among others, TLT collects the following types of personal data:
- (1) personal data disclosed to TLT by the data subject;
 - (2) personal data generated as a result of the day-to-day communication between the data subject and the TLT;
 - (3) personal data manifestly made public by the data subject (e.g. on social media);
 - (4) personal data generated as a result of the activities of the data subject;
 - (5) personal data generated upon use of services;
 - (6) personal data generated as a result of visiting and using the website;
 - (7) personal data received from third parties;
 - (8) personal data created and combined by TLT (electronic correspondence as part of the customer relationship or order history).
-

Here you can find information on the purposes for and grounds on which we may process your personal data.

5. CATEGORIES OF PERSONAL DATA AND PURPOSES AND GROUNDS FOR PROCESSING

- 5.1 **Upon consent**, TLT will process personal data exactly within the limits, to the extent, and for the purposes specified by the data subject. In the case of consent, TLT acts based on the principle that each consent must be clearly distinguishable from other matters and be in a comprehensible and easily accessible form and use clear and simple language.

The data subject may give their consent, inter alia, in writing or by any means which leaves a written record or through activity. If the data subject gives their consent to the processing of personal data through activity, the TLT processes personal data in accordance with the requirements laid down in the privacy policy.

- 5.2 **Upon entering into and performing an agreement**, the processing of personal data may be additionally provided for in a specific agreement, but TLT may process personal data for the following purposes:
- (1) to take measures at the request of the data subject prior to entering into the agreement;
 - (2) to identify a customer to the extent required by due diligence;
 - (3) to perform obligations to the customer with regard to the provision of its services;
 - (4) to communicate with a customer;
 - (5) to ensure a customer fulfils its payment obligations;
 - (6) to submit, realise and protect claims.
- 5.3 **For the conclusion of an employment agreement**, the processing of personal data of the applicant by TLT on the basis of legitimate interest includes the following:
- (1) the processing of information provided by an applicant to TLT for the purpose of entering into an employment agreement;

-
- (2) the processing of personal data of a person marked as reference by an applicant;
 - (3) processing of the personal data collected from national databases and registers and public (social) media.

If the applicant is not selected, the TLT will store the personal data collected for the entry into an employment agreement for a maximum of one year for the purposes of making a job offer to the applicant in the event of a vacancy.

5.4 **Legitimate interest** means the interest of TLT to provide the best possible services on the market to manage its business. Pursuant to the law, TLT shall process personal data only after careful evaluation. In particular, personal data may be processed on the basis of legitimate interest for the following purposes:

- (1) for ensuring a trust-based relationship with a customer, for example personal data processing that is strictly necessary to identify the ultimate beneficiaries or to prevent fraud, as well as to ensure the safety of the customers;
- (2) to manage and analyse its customer base to improve the availability, selection and quality of its products and services and to make better and more personal offers to a customer upon their consent;
- (3) to collect identifiers and personal data during the use of the website, social media pages and other services of TLT. The TLT uses the collected data for web analysis or for the analysis of mobile and information society services, for ensuring and improving the operation, for statistical purposes and for analysing the behaviour and user experience of visitors and for providing better and more personalised services;
- (4) to analyse a customers' and visitors' behaviour in various sales channels and on the website;
- (5) to monitor the service. TLT may record certain notices and orders provided in the rooms of its location and via means of communication (email, phone, etc.), as well as information and other actions provided or performed by TLT, and use these recordings to prove its orders or other actions, if necessary;
- (6) to take measures for network, information and cyber security reasons, such as for combating piracy and ensuring the security of the website and for making and storing backups;
- (7) for organisational purposes. In particular for financial management, including the processing of personal data of the customers or employees;
- (8) to establish, exercise or defend legal claims;
- (9) TLT uses video surveillance on its territory. The purpose of using cameras in rooms or areas containing sources of danger, such as repair shops, washing bays, petrol stations or oil storage facilities, is to protect the property and ensure the safety of persons in such a way that it would be possible to prevent danger, to react as fast as possible in an emergency situation and to analyse the incident afterwards. The purpose of using cameras in other rooms, car parks and on the façade of the building is primarily to ensure security in order to protect the property of TLT and its employees and to prevent unauthorised access to the territory, as well as to organise traffic on the territory of TLT.

-
- 5.5 **To fulfil an obligation arising from law**, TLT processes personal data in order to fulfil obligations provided by law or to use them in cases permitted by law. For example, the law imposes obligations to processing payments or adhering to money laundering rules.
- 5.6 If the processing of personal data takes place for a **purpose other** than that for which the personal data were originally collected or is not based on the data subject's consent, TLT will carefully assess the admissibility of such new processing. In order to determine whether the processing for this new purpose is in accordance with the purpose for which the personal data were originally collected, TLT shall take into account, inter alia:
- (1) the relation between the purposes for which the personal data were collected and the purposes of the proposed further processing;
 - (2) the context in which the personal data are collected, in particular the relationship between the data subject and the TLT;
 - (3) the nature of the personal data, in particular whether specific categories of personal data or personal data relating to convictions and criminal offenses are processed;
 - (4) the possible consequences that the proposed further processing may have for data subjects;
 - (5) the existence of appropriate safeguards, such as encryption and pseudonymisation.
-

Here you can find information on when we may transfer your personal data to our cooperation partners.

6. DISCLOSURE AND/OR TRANSFER OF CUSTOMER DATA TO THIRD PARTIES

- 6.1 TLT cooperates with persons to whom TLT may transfer data related to data subjects, including personal data, within the framework and for the purpose of cooperation.
- 6.2 Such third parties may include advertising and marketing partners, market research companies, customer satisfaction survey companies, debt collection agencies, credit registers, ICT partners, i.e. providers of various technical services, invoicing service providers, etc., provided that:
- (1) the respective purpose and processing is lawful;
 - (2) the processing of personal data is performed in accordance with the instructions of TLT and on the basis of a valid agreement.
- 6.3 TLT transfers personal data outside the European Union only if:
- (1) the Commission of the European Union has decided that there is “adequate level of protection” in that country;
 - (2) the TLT has established adequate safeguards (e.g. binding internal rules or standard data protection clauses);
 - (3) the data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards;
 - (4) the transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request;
 - (5) the transfer is necessary for the conclusion or performance of an
-

-
- in the interest of the data subject between the controller and another natural or legal person;
 - (6) the transfer is necessary for important reasons of public interest;
 - (7) the transfer is necessary for the establishment, exercise or defence of legal claims;
 - (8) the transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent;
 - (9) the transfer is made from a register, which according to Union or Member State law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down by Union or Member State law for consultation are fulfilled in the particular case.
-

Here you can find a description of how we protect your personal data and where you can find information about the retention period of personal data.

7. SAFETY OF THE PROCESSING OF PERSONAL DATA

- 7.1 The TLT retains personal data for the minimum period required as specified by the TLT. The personal data whose retention period has expired will be destroyed using the best practices and in accordance with the procedure established for this purpose by the TLT.
 - 7.2 In case of an incident related to personal data, the TLT will take all necessary measures to mitigate the consequences and hedge any relevant risks in the future. Inter alia, the TLT registers all incidents and informs the Data Protection Inspectorate and the data subject directly (e.g. by email) or publicly (e.g. via the news) in prescribed cases.
-

Your personal data belong to you and here you will find information about your rights in the protection of your personal data.

8. RIGHTS OF THE DATA SUBJECT

- 8.1 Rights related to consent:
 - (1) The data subject has the right to inform the TLT at any time in writing or by any means which leaves a written record of their wish to withdraw their consent to personal data processing.
 - (2) You can view, change and revoke the consents given to the TLT by contacting the TLT by any means which leaves a written record.
 - 8.2 in the processing of personal data, the data subject also has the following rights:
 - (1) **Right to receive information**, i.e. the data subject's right to receive information regarding the personal data which have been collected concerning them.
 - (2) **right of access** which includes, inter alia, the data subject's right to receive a copy of the processed personal data;
 - (3) **Right to rectification of inaccurate personal data**. The data subject has, inter alia, the right to obtain from the TLT the rectification of inaccurate data.
 - (4) **Right to erasure of data**, i.e. in certain cases, the data subject has the right to request the erasure of personal data, for example if the processing is based only on consent.
 - (5) **right to request restriction of processing of personal data** This right arises, inter alia, if the processing of personal data is unlawful
-

or the accuracy of the personal data is contested by the data subject. The data subject had the right to request the restriction of the processing of personal data so that the controller can verify the correctness of personal data or if the processing of personal data is unlawful, but the data subject does not request the erasure of personal data;

- (6) **the right to data portability**, i.e. in certain cases, the data subject acquires the right to receive his/her personal data in a machine-readable format or have them transferred to another controller;
 - (7) **rights related to automated processing** which mean, inter alia, that the data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on automated decisions;
 - (8) **Right to the assessment of a supervisory authority** on whether the processing of the personal data of the data subject is lawful.
 - (9) **Right to compensation for damage**, if the processing of personal data has caused damage to the data subject.
-

Here you can find information on how to receive explanations or how and where to lodge a complaint.

9. EXERCISE OF RIGHTS AND SUBMISSION OF COMPLAINTS

9.1 Exercise of rights:

The data subject has the right to contact the TLT if they have a question, request or complaint regarding the processing of personal data.

9.2 Lodging of complaints:

- (1) the data subject has the right to lodge a complaint with TLT, the Data Protection Officer of TLT, the Data Protection Inspectorate or a court if the data subject finds that his or her rights have been violated in the course of the processing of personal data.
- (2) The contact details of the Data Protection Inspectorate are available on the website of the Data Protection Inspectorate at:
<http://www.aki.ee/et/inspektsioon/kontaktid-nouandetelefon>

Here you will find information about which cookies or other technologies we use and how you can control the use of such technologies.

10. COOKIES AND OTHER WEB TECHNOLOGIES

- 10.1 The TLT may collect data regarding the visitors of the website and other information society services by using cookies (i.e. small pieces of information stored by the visitor's browser on the hard disk of the computer or any other device of the visitor) or other similar technologies (e.g. IP address, device information, location information) and process these data.
- 10.2 The TLT uses the collected data to provide the service according to the habits of the visitor or customer, to ensure the best service quality, to inform the visitor and customer about the content and give recommendations, to update advertisements and make marketing more efficient, to facilitate logging in and data protection. The collected data are also used to count visitors and to record their habits when using the website.
- 10.3 TLT uses session, persistent and advertising cookies. A session cookie is automatically deleted after every visit, persistent cookies are retained upon repeated use of the website, and advertising and third-party cookies are used by the websites of the partners of the TLT that are

connected with the website of the TLT. The TLT does not control the generation of those cookies, therefore information on these cookies can be obtained from third parties. Further information on cookies is available in the explanatory materials (see section 12: **Error! Reference source not found.**).

10.4 Visitors agree to the use of cookies on the website, in information society service devices or the web browser.

10.5 Most web browsers allow cookies. Without fully allowing cookies, the functions of the website are not available to a visitor. The visitors can control the enabling or disabling of cookies and other similar technologies via the settings of the visitor's own web browser, the settings of the information society service, and platforms for making such privacy more efficient (see section 12: **Error! Reference source not found.**).

We offer a variety of services. Here you can find relevant information on services of which personal data processing constitutes a significant part.

11. SPECIAL PROVISIONS FOR THE SERVICES OF TLT

11.1 The TLT provides the following services, of which personal data processing constitutes a significant part:

11.2 **Provision of public transport.** TLT is primarily engaged in providing bus, trolleybus, and tram services on routes within the integrated ticketing system of Tallinn on the basis of an agreement entered into with the Tallinn Transport Department.

Bus, tram, and trolleybus rental. The TLT offers an opportunity to rent an urban bus, tram or trolleybus with an experienced driver on the basis of a lease contract or commercial lease contract.

11.4 Advertising **on public transport vehicles.** TLT is opportunities for advertising on public transport vehicles.

11.5 **Roadworthiness testing and vehicle diagnostics.** The roadworthiness test and the inspection of a vehicle in international traffic services are available for motor cars, motorcycles, trucks, buses, tractors, non-road vehicles and their trailers.

11.6 **Vehicle wash service.** TLT offers vehicle wash services for both buses and trucks.

Repair and maintenance of Scania and Volvo buses. Repair and maintenance of Scania and Volvo buses for our contractual clients.

Lease of office and industrial spaces. TLT leases office and industrial spaces and organises parking in the surveilled premises belonging to TLT.

Here are the websites where you can learn more about how different web technologies work.

12. INFORMATION ABOUT WEB TECHNOLOGIES

12.1 More information about different web technologies:

(1) **All About Cookies** (*in English*): descriptions of cookies and other web technologies used by TLT;

(2) **Your Online Choices; About Ads; Network Advertising** (*in English*): a platform for controlling and monitoring cookies and other web technologies where the data subject can change and control how their personal data are being used and collected.

Here you will find our contact details.

13. CONTACT DETAILS AND INFORMATION

13.1 Contact details relevant for data subjects of TLT:

- (1) You can contact the TLT with questions regarding personal data by e-mail tlt@tl.ee.
 - (2) The data protection officer of TLT is **Andres Õige** who can be contacted by e-mail andres.oige@tallinnlt.ee.
-

Here you will find information about the validity of and changes to the Privacy Policy.

14. OTHER TERMS

14.1 TLT has the right to unilaterally change the Privacy Policy. TLT will inform data subjects about the amendments on the website of TLT, by e-mail or by other means.

14.2 Recent changes to the Privacy Policy and entry into force:

Publication:	Main modifications:	Entry into force:
<u>XX.XX. XXXX</u>	<u>XX-XX-XXXX</u>	<u>New privacy policy text.</u>
