

PRIVACY POLICY



Here you will find all information about the data processing principles of Tallinn City Transport Company (hereinafter TLT)

Under the terms, you'll find more specific definitions of words that are often used in the Privacy Policy and are capitalized.

1. DEFINITIONS

- 1.1 A data subject is a natural person about whom TLT has information that can be used to identify a natural person. Data subjects are, for example, natural persons in the capacity of Customers, Visitors, cooperation partners, and employees, about whom TLT has personal data.
- 1.2 **Privacy Policy** is this text that provides principles of Personal Data Processing in TLT.
- 1.3 Personal Data is any information about an identified or identifiable natural person.
- 1.4 **Processing of Personal Data** is any operation performed on the Data Subject's Personal Data.
- 1.5 Customer is any natural or legal person who uses or has expressed a wish to use the Services of TLT.
- 1.6 The Agreement is a Service Agreement or other Agreement entered into between TLT and the Customer.
- 1.7 **The Standard Terms and Conditions** set out the general terms and conditions that apply when entering into an Agreement with a TLT.
- 1.8 **The website** is the TLT website: <https://www.tallinnlt.ee>.
- 1.9 **A visitor** is a person who uses the TLT Website.
- 1.10 **Services** are all services and products offered by TLT.
- 1.11 **The TLT Data Protection Officer** is a person who follows the application of the Principles of Personal Data Processing in the TLT and with whom the Data Subject can contact in case of a complaint.
- 1.12 **Cookies** are data files that are sometimes stored on the Website in the visitor's device.

In the General Provisions, you will find information on who is the controller of Personal Data and when these Privacy Terms apply.

2. GENERAL PROVISIONS

- 2.1 Tallinna Linnatranspordi AS is a legal entity with registry code 10312960, located at Kadaka tee 62a, Tallinn.
- 2.2 Personal data may be processed by the TLT:
 - (1) as a data controller identifying the purposes and means of processing;
 - (2) as a data processor in accordance with the instructions of the data controller;
 - (3) as a recipient to the extent that Personal Data is transmitted.
- 2.3 These TLT Privacy Terms are an integral part of the Agreement between TLT and the Customer and the Standard Terms.
- 2.4 Privacy Policy applies to Data Subjects, and all PTA employees and cooperation partners are subject to the rights and obligations set forth in the Privacy Policy.



Here you will find the main principles that TLT always follows and adheres to when processing your Personal Data.

3. PRINCIPLES

- 3.1 TLT always proceeds from the interests, rights, and freedoms of the Data Subjects when processing Personal Data.
- 3.2 The objective of TLT is responsible Processing of Personal Data, which is based on best practice, bearing in mind that it is always ready to demonstrate the compliance of the Processing of Personal Data with the set goals.
- 3.3 All processes, instructions, operations, and activities related to the Processing of Personal Data of TLT are based on the following principles:
- (1) **Legality.** There is a statutory basis for Processing Personal Data, such as consent;
 - (2) **Fairness.** This means in particular that the Data Subject has sufficient information on how Personal Data is processed;
 - (3) **Transparency.** The Processing of Personal Data is transparent to the Data Subject. It is explained in simple language why, how, and when Personal Data is processed;
 - (4) **Purposefulness.** Personal Data shall be collected for specified, explicit, and legitimate purposes, and it will not later process in a way incompatible with those purposes;
 - (5) **Minimization, i.e., data processing as minimal as possible.** Personal Data is relevant, important, and limited to what is necessary for the purpose for which they are Processed.
 - (6) **Accuracy.** Personal Data is correct and, where necessary, updated and all reasonable steps have been taken to ensure that the inaccurate Personal Data from the point of view of Processing of Personal Data is erased or corrected immediately;
 - (7) **Restriction on storage.** Personal Data shall be stored in a form that allows the identification of Data Subjects only for as long as is necessary for the purpose for which the Personal Data is processed;
 - (8) **Reliability and confidentiality.** Processing of Personal Data shall be carried out in a manner that ensures appropriate security of the Personal Data, including protection from unauthorized or illegal processing and accidental loss, destruction, or damage through reasonable technical or organizational measures. TLT has both internal instructions, rules for employees, and separate agreements with each authorized processor that provides best practices, continuous risk assessment, and appropriate technical and organizational measures for the Processing of Personal Data;
 - (9) **Default and integrated data protection.** TLT ensures that all the systems are used to meet the required technical criteria. Appropriate data protection measures are designed when upgrading or designing any information and data system.
- 3.4 When processing Personal Data, TLT proceeds from the purpose of being able to prove compliance with the above-mentioned principles and additional information can be requested from TLT regarding compliance with these principles.
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Here you will find information about how we collect Personal Data.

4. COMPOSITION OF PERSONAL DATA

- 4.1 TLT collects the following types of Personal Data:
- (1) Personal Data disclosed to the TLT by the Data Subject;
 - (2) Personal Data arising from normal communication between the Data Subject and TLT;
 - (3) Personal Data clearly disclosed by the data subject (e.g. on social media);
 - (4) Personal Data arising from the consumption of the Services;
 - (5) Personal Data generated as a result of visiting and using the Website;
 - (6) Personal data obtained from third parties;
 - (7) Personal data created and combined by TLT (within the customer relationship)
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Here you will find information about the purposes and bases for which we may process your Personal Data.

5. COMPOSITION OF PERSONAL DATA AND OBJECTIVES AND GROUNDS FOR PROCESSING

- 5.1 Upon **consent**, TLT will process Personal Data exactly within limits, to the extent and for the purposes specified by the Data Subject. In the case of consents, TLT proceeds from the principle that each consent must be clearly distinguishable from other issues and in an understandable and easily accessible form in a clear and simple language.
- 5.2 **While entering into and performing the Agreement**, Processing of Personal Data may be further specified in a specific Agreement, but Äripäev AS may process Personal Data for the following purposes:
- (1) To take pre-contractual measures at the request of the Data Subject;
 - (2) Customer identification to the extent required by the due diligence;
 - (3) Fulfillment of obligations to the Customer regarding the provision of its Services;
 - (4) Communicating with the Customer;
 - (5) Securing the Customer's payment obligation;
 - (6) Submission, realization, and protecting of claims.
- 5.3 **In order to enter into an employment contract** on the basis of concluding a contract and a legitimate interest, the processing of personal data of a candidate for PTA employment includes the following:
- (1) Processing of data transmitted by the candidate to TLT for the purpose of concluding an employment contract;
 - (2) the Processing of Personal Data received from the person indicated by the job applicant as a reference;
 - (3) national databases and registers and public (social) media
- Processing of Collected Personal Data.
If the candidate for employment is not selected, TLT shall retain the Personal Data collected for the conclusion of the employment contract for a maximum of one year in order to make an offer of employment to the candidate in the event of a vacancy.
- 5.4 **Legitimate interest** means TLT's interest in managing and directing its own business in order to enable it to offer the best possible Services on the market. Pursuant to the law, TLT processes Personal Data only after careful evaluation. In particular, the Processing of Personal Data carried out on the basis of legitimate interest may occur for the following purposes:
- (1) To ensure a trustful customer relationship, such as the Processing of Personal Data, which is strictly necessary to identify actual beneficiaries or prevent fraud;
 - (2) Managing and analyzing the customer base to improve the availability, choice, quality of the Services and Products, and to make the best and most personalized offers to the Customer upon consent;
 - (3) Identifiers and Personal Data collected when using the Website, TLT social media pages, and other Services. TLT uses the collected Data for web analysis or analysis of mobile and information society services, to ensure its operation, improvement, to compile statistics and to analyze the visitor's behavior and user experience, and to provide a better and more personal Service;
 - (4) Analysis of Customer and Visitor behavior in various sales channels on the Website;
 - (5) Service monitoring. TLT may record notices and orders given both on the premises of its location and by means of communication (e-mail, telephone, etc.), as well as information and other actions taken by TLT and, if necessary, use these recordings to prove orders or other actions;
 - (6) Measures taken for the network, information, and cybersecurity reasons, such as to combat piracy and to ensure the security of the Website and to make and store backups;
 - (7) For organizational purposes. In particular for financial management, including

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- (8) For the preparation, submission, or defense of 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, laundries, petrol stations, oil storage facilities, is to protect property and ensure the safety of persons so that they can react as quickly as possible in an emergency and analyze it afterward. The purpose of using cameras located in other rooms, car parks, and on the façade of the building is, in particular, to ensure security in order to protect the property of the company and its employees and to prevent unauthorized access, but also to organize traffic on TLT territory;
 - (10) The TLT uses video surveillance in its public transport, and the cameras' field of view includes the space inside the public transport (directed to the public transport doors and public areas). The purpose of using the cameras is to protect property and ensure the safety of persons so that it is possible to react as quickly as possible in an emergency and analyze what has happened, and to protect the rights of TLT, TLT employees, and passengers in public transport.
 - (11) TLT uses its video surveillance in public areas: in front of, on the side and behind public transport and at the final stop at Tondi 17, and the public field of view of the cameras remains (incl. surrounding roads and sidewalks when moving and stopping public transport). The purpose of the use of cameras is to protect property and ensure the safety of persons so that it is possible to react as quickly as possible in an emergency situation and analyze what has happened afterward; prevent unauthorized access and ensure the protection of the rights of TLT, TLT employees and third parties.

5.5 In order to fulfill an obligation arising from law, TLT processes Personal Data in order to fulfill obligations provided by law or to implement the uses permitted by law. For example, the law imposes obligations on the processing of payments or compliance with money laundering rules.

5.6 If the processing of Personal Data takes place for a **purpose other** than that for which the Personal Data was originally collected or is not based on the consent of the Data Subject, TLT will carefully assess the admissibility of such new processing. In order to determine whether the processing for the new purpose is in accordance with the purpose for which the Personal Data was originally collected, TLT shall take into account, inter alia:

- (1) the link between the purposes for which the Personal Data was collected and the purposes of the intended 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 Personal Data relating to specific categories of Personal Data or criminal convictions and offenses are processed;
- (4) the possible consequences of the proposed further Processing for Data Subjects;
- (5) the existence of appropriate safeguards, such as encryption and pseudonymization.

Here you will find information on when we may transfer your Personal Data to our partners.

6. DISCLOSURE AND/OR TRANSMISSION 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, customer satisfaction surveyors, debt collection service providers, statutory investigative bodies, TLT customers, payment default registers, ICT partners, i.e., providers of various technical services, invoicing service providers, provided that:

- (1) the purpose and processing are legitimate;
- (2) The processing of personal data takes place in accordance with the instructions of the TLT and on the basis of the valid Agreement.

6.3 TLT transmits Personal Data outside the European Union only if:

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- (1) The European Commission has decided that there is the so-called sufficient protection in this country;
 - (2) TLT has put in place adequate safeguards (e.g., binding intra-group rules or standard data protection clauses);
 - (3) The Data Subject has explicitly consented to the transmission after having been informed by TLT of the possible dangers of such transmission due to the absence of a decision on the adequacy and of the relevant protective measures;
 - (4) if the transmission is necessary for the performance of a contract between the Data Subject and the data controller or for the implementation of pre-agreement measures taken at the request of the Data Subject;
 - (5) where the transmission is necessary for the conclusion or performance of a contract between the data controller and another natural or legal person in the interest of the Data Subject;
 - (6) transmission is necessary for strong reasons arising from public interest;
 - (7) transmission is necessary for compilation, submission or defending of legal requirements;
 - (8) transmission is necessary to protect the vital interests of the Data Subject or other persons if the Data Subject is physically or legally incapable of giving consent.
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Here you will find a description of how we protect your Personal Data and where to find information about the terms of retention of Personal Data.

7. SECURITY OF PROCESSING PERSONAL DATA

- 7.1 TLT retains Personal Data for the minimum necessary time. Personal Data for which the term of retention has expired shall be destroyed using best practices and in accordance with the procedure established by TLT.
 - 7.2 TLT has established guidelines and rules of procedure on how to ensure the security of Personal Data through the use of both organizational and technical measures.
 - 7.3 In the event of any incident involving Personal Data, TLT will take the necessary measures to mitigate the consequences and mitigate relevant risks in the future. Among other things, TLT registers incidents and notifies the Data Protection Inspectorate and the Data Subject directly (e.g., via e-purchase) or publicly (e.g., through news).
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Your Personal Data belongs to you, and here you will find information about your rights to the protection of your Personal Data.

8. RIGHTS OF THE DATA SUBJECT

- 8.1 Rights related to the consent:
 - (1) The Data Subject shall have the right at any time to notify TLT of his or her wish to withdraw the consent of the Processing of Personal Data.
 - (2) You can view, modify, and withdraw the consent given to TLT in the self-service of TLT or by contacting TLT.
- 8.2 The Data Subject also has the following rights regarding processing Personal Data:
 - (1) Right to receive information, i.e., the right of the Data Subject to receive information about the Personal Data collected about him/her.
 - (2) Right to access data including the right of the Data Subject to a copy of the Processed Personal Data.
 - (3) Right to correct inaccurate Personal Data. The Data Subject can require the TLT to correct incorrect data;
 - (4) **The right to delete the data**, or in some cases the Data Subject has the right to request that the Personal Data be deleted, for example, if the processing is performed only on the basis of consent.
 - (5) The right to request the restriction of the processing of Personal Data. This right arises, inter alia, if the processing of Personal Data is not permitted by law or if the Data Subject disputes the accuracy of the Personal Data. The Data Subject has the right to demand that the processing of Personal Data be limited to a time that allows the controller to verify the accuracy of the Personal Data or if the processing of Personal Data

_____ is illegal, but the Data Subject does not request the deletion of Personal Data; _____

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- (6) The right to transfer data, or in certain cases, the Data Subject is entitled to receive Personal Data in machine-readable form or transferred to another Data Controller;
 - (7) Rights related to Automated Processing means that the Data Subject has the right, based on his or her specific circumstances, at any time, to object to the Processing of Personal Data that is based on automated decisions
 - (8) **The right of the supervisory authority to assess** whether the Processing of the Personal Data of the Data Subject is lawful;
 - (9) **Right to compensation for damage caused** to the Data Subject by the Processing of Personal Data
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Here you will find information on how to get an explanation or how and where to file 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 in the event of a question, request, or complaint related to the Processing of Personal Data.
 - 9.2 Submission of complaints:
 - (1) The Data Subject has the right to file a complaint with the TLT, the TLT Data Protection Officer, the Data Protection Inspectorate, or a court if the Data Subject finds that his or her rights have been violated during the Processing of Personal Data.
 - (2) Contact details of the Data Protection Inspectorate (DPI) can be found on the DPI website at:
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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 TLT may collect and process data about Visitors to the Website and other information society services using Cookies (i.e., small fragments of information stored by the visitor's browser on the visitor's computer or other device's hard drive) or other similar technologies (e.g., IP address, device information, location information).
 - 10.2 TLT uses the data collected to enable the provision of the Service in accordance with the habits of the Visitor or the Customer; to secure the best quality of the Service; inform the Visitor and the Customer of the content and make recommendations; make advertisements more relevant and improve marketing efforts; to facilitate login and data protection. The data collected is also used to count the Visitors and to register their usage patterns.
 - 10.3 TLT uses session cookies, persistent cookies, and advertising cookies. The session cookie is automatically deleted after each visit; Persistent cookies are retained upon repeated use of the Website, and advertising and third-party cookies are used by TLT partner websites linked to the TLT Website. TLT does not control the occurrence of these Cookies, so you will receive information about these cookies from third parties. Read more about cookies in the explanatory material (see section 12:
 - 10.4 In terms of Cookies, the Visitors agree to the use thereof on the Website, in the Information society service settings or web browser.
 - 10.5 Most browsers allow Cookies. Without fully enabling Cookies, the functions of the Website will not be available to the visitor. Enabling or disabling Cookies and similar technologies is under the control of the visitor through their own web browser settings, information society service settings, and platforms of enhancement of such privacy (see section 12:
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We have a variety of products. Here you will find the

11. SPECIAL PROVISIONS FOR TLT SERVICES

- 11.1 We have a variety of products. Here you will find relevant information about one or the other product in which the Processing of Personal Data is an essential part.
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relevant

information one or about another product, in which Personal Data Processing is important part.

- 11.2 **the main activity provision of public transport service.** The main activity of TLT is the bus-provision of trolleybus and tram traffic services to the unified ticket system of Tallinn bus, tram and trolleybus lines with the Tallinn Transport Authority under an agreement concluded.
- 11.3 **Ordering a bus, tram, and trolley.** TLT offers the possibility to order a city bus with an experienced bus driver.
- 11.4 **Advertising on public transport.** It is possible to order advertising for public transport from TLT.
- 11.5 **Technical inspection and diagnostics.** Technical inspection is performed on passenger cars, trucks, buses, tractors, mobile machinery and their trailers, and their trailers. In addition, an international inspection is carried out;
- 11.6 **Car wash.** TLT also offers a car wash service.
- 11.7 **Repair and maintenance of Scania and Volvo buses.** Technical maintenance and repair of Scania and Volvo buses for contract customers in the Mustamäe workshop.
- 11.8 **Rental of office and production space.** TLT rents out office and production space and
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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** Descriptions of cookies and other web technologies used by TLT;
 - (2) **Your Online Choices; About Ads; Network Advertising:** A platform for controlling and monitoring cookies and other web technologies, on which the Data Subject can change and control how Personal Data is used and collected.
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Here you will find our contact details.

13. CONTACT DETAILS AND INFORMATION

- 13.1 Contact details for the Important TLT Data Subject:
- (1) You can contact TLT regarding the issues of Personal Data at the e-mail address andmekaitse@tlt.ee.
 - (2) The Data Protection Officer of TLT is **Laura Kaal**, with whom it is possible to contact the e-mail address andmekaitse@tlt.ee.

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

14. OTHER TERMS AND CONDITIONS

- 14.1 TLT has the right to unilaterally change this Privacy Policy. TLT informs the Data Subjects on the TLT website, by e-mail or in any other way.
- 14.2 Last modifications of the Privacy Policy and entry into force thereof:
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| Publication | Entry into force: |
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