



**Privacy policy for  
The Rejsekort-app  
Valid from 2 September**

**Version 5**



## Data Controller

Rejsekort & Rejseplan A/S is the data controller for the processing of personal data in connection with the registration of information in the Rejsekort system and related systems, including personal data registered via the Rejsekort app and the website, [www.rejsekort.dk](http://www.rejsekort.dk). See our contact details in section 1 below.

### Rejsekort & Rejseplan A/S

Automatikvej 1  
2860 Søborg  
CVR No.: 27 33 20 72

Rejsekort & Rejseplan A/S' Data Protection Officer (DPO) can be contacted at: [DPO@rejsekort.dk](mailto:DPO@rejsekort.dk) or by phone at **+45 70 20 40 08** on weekdays between **10:00 AM and 15:00 PM**.

For further contact information, see section 1 below.

## Privacy policy for The Rejsekort-app

Rejsekort & Rejseplan A/S places great importance on ensuring that you feel secure as a customer with us and when using the Rejsekort system and associated systems.

That is why we process the information you provide to us, and which we collect about you in connection with your use of Rejsekort as an app, responsibly, with respect for your privacy, and of course in accordance with applicable data protection regulations.

You can read more about our processing of your information in this privacy policy.

At the top of our privacy policy, you can always see when the policy was last updated and/or amended. Rejsekort as an app is a mobile application (hereinafter referred to as "app" or "the app") developed by Rejsekort & Rejseplan A/S, in which you can purchase a valid ticket (travel entitlement) for public transport from transport operators affiliated with Rejsekort & Rejseplan A/S. For information about the affiliated transport operators, please refer to the Terms of Use, section 3.

## 1. Contact details of the data controller and data protection officer

Rejsekort & Rejseplan A/S is the data controller for the processing of personal data in The Rejsekort-app. Our contact details are:

Rejsekort & Rejseplan A/S  
Automatikvej 1  
2860 Søborg, Denmark  
CVR no.: 27 33 20 72

Rejsekort Customer Service Phone: 70 11 33 33 33

Via contact form at [https://www.rejsekort.dk/rejsekort\\_app/Kontaktformular](https://www.rejsekort.dk/rejsekort_app/Kontaktformular)

By letter to:  
Rejsekort Customer Service PO Box 736  
2500 Valby, Denmark

Contact details for our Data Protection Officer (DPO) are  
[DPO@rejsekort.dk](mailto:DPO@rejsekort.dk)  
Phone: 70 20 40 08  
Phone hours are weekdays between 10AM-15PM.

## **2. What data do we collect and what is the purpose of the processing**

### **2.1. Information about your journey, location and activity in connection with your use of The Rejsekort-app**

We process the information you provide when you register as a user of The Rejsekort-app. We also process a number of data that is created through your use of the app.

The information that you need to provide when creating a profile is:

- Your mobile phone number
- Your email address
- Your first and last name
- Your date of birth
- Information about the associated payment method

A system-generated unique user ID is also created and linked to your profile

#### **Information when registering a user under the age of 18**

If you are under 18 years of age, you must be registered by an adult who is either a legal guardian or has parental responsibility.

The adult legal guardian must, during profile creation for a user under 18, provide:  
– The child's first and last name  
– The child's date of birth

As part of creating a profile for a child, the adult must undergo age validation via MitID to confirm that they are at least 18 years old. If the MitID validation is successful, this is recorded as a checkmark for age validation on the adult's profile, whereas a failed validation does not result in any record being created on the adult's profile. No other data is collected from MitID apart from the confirmation that the adult is at least 18 years old. The adult's payment method is automatically linked to the profile of the user under 18. The user under 18 must enter their own mobile phone number, while the email address is optional.

#### **Information about multiple travellers checked in on your profile**

Once you have created your profile, and you choose to check in multiple travellers when using the app, we register this on your journey in order to calculate the correct fare. We only record the customer types you check in and the number of travellers per customer type for the journey.

#### **Location and activity data**

Once you have created your profile and use the app to purchase a ticket for public transport, we collect the necessary location data (GPS) and activity data (motion sensors) from your mobile phone to deliver the Rejsekort service.

The app only has access to data that is necessary to provide you with a valid ticket for public transport with the affiliated transport operators, and only has access to this data when you open the app and between check-in and check-out.

Rejsekort as an app works by recording your travel activity when you use the app. Specifically, we collect location and activity data (motion sensors) from your mobile device. We collect location and activity data from the moment you open Rejsekort as an app, throughout your journey from check-in to check-out, until your journey has been calculated. However, we do not collect location or activity data when you are not actively using the app – for example, if it is running in the background on your phone or if you are not checked in. In other words, we only collect data on your phone or in the Rejsekort system when the app is open, and we only store information locally on your phone if the app is closed without a check-in.

We begin registering your location when you open the app. Your location is stored locally on your phone in 5-minute intervals, after which the data is overwritten with new information. This is done to identify the nearest station or stop, which becomes your starting location when you check in. If you open and close the app without checking in, the recorded location data prior to check-in will not be saved on your phone, nor will we collect it.

If you open the app and proceed to check in, we only collect a maximum of the last 2 minutes of location data prior to check-in (i.e. from when you open the app until you have checked in), in order to verify that the system-identified stop is the correct one.

When you check in, we record the time and location of the check-in, and the app then tracks your location and activity until you check out again. When you check out, we record the location that marks the end of your journey. This is done to provide you with a valid ticket for your entire trip by generating the correct ticket based on your travel route and means of transport used, and to calculate the correct fare. Once you have checked out and the system has calculated your journey, we no longer record your location or activity. Rejsekort as an app therefore only collects data when the app is searching for a station or stop, when you are actively travelling, and until you check out manually or use Smart check-out, which automatically checks you out of the app.

Once you have checked out, we stop recording your location and activity data as soon as the system is able to accurately determine where the check-out took place. In areas with poor mobile reception, this may take longer than in areas with good connectivity.

If you do not check out immediately after ending your journey, we will continue to record your location and activity data until the check-out is completed—either manually by you or automatically by the system. We do this to ensure that you have valid travel entitlement for as long as you are checked in. Once you or the system checks you out, your journey will be calculated, and the most likely location where your journey actually ended will be set as your final destination.

In the above cases, we process the location and activity data that relates to the time between the end of your public transport journey and the moment check-out is completed, in order to ensure:

- that the system functions correctly, including fixing system errors and improving the system
- that our solution has not been misused, and
- that we can assist you via the Rejsekort Customer Centre

For item 1, we store and process the personal data in pseudonymised form, meaning the data is masked and cannot be directly linked to you without additional information. For items 2 and 3, we need to process and store the data in an identifiable form, as we need to know the identity of the individual customer—for example, to correct journey information where an incorrect destination has been calculated.

We store the location and activity data (motion sensors) collected from 5 minutes after exiting your last public transport vehicle until check-out is completed, in pseudonymised form for 2 months, for the purpose of system improvements and correction of system errors, after which the data is deleted. This information is also stored in directly identifiable form for 2 months for the purposes of 1) preventing fraud with the application and 2) enabling the Rejsekort Customer Centre to assist with correcting any errors in journeys.

If there is more than 30 minutes between two means of transport (e.g. bus and train), the location and activity data (motion sensors) is deleted according to the following rules:

- The transit time, starting five minutes after the first mode of transport and ending five minutes before the next, is deleted after 2 months
- The first five minutes after the first transport and the five minutes just before the next transport are retained as part of your journey data and are deleted only after 36 months

Thus, only your location and activity data related to your actual journey using public transport (including 5 minutes before and 5 minutes after the recorded part of the journey) is stored for 36 months.

We also process your location and activity data (motion sensors) for the purpose of detecting and preventing misuse. Read more about our processing activities for the detection and prevention of misuse under section 3.

We also use the data in pseudonymised form to train the system's algorithms so that journey calculations can become more accurate, to identify and correct system errors, and to develop new features that can improve the app's user experience.

Information about your mobile device, settings, and app usage

To ensure the app functions correctly, and to enable us to assist you in case you experience issues with the app, we also process certain technical information. This includes:

- Your IP address and device ID
- Your ticket settings, including customer type and any applicable discount level
- Information about the mobile device used:
  - Brand and model
  - Operating system
  - Wi-Fi and Bluetooth signals
  - Battery status

We also collect data on how you use the app, such as the date and time of access, which app features or pages are visited, app crashes, other system activity, and browser type. However, we only process this usage data in anonymised form.

Information about travel history and purchase history

As you are entitled to access your purchase history for 36 months, we store your travel history and purchase history in the app for this period. This allows you to continuously verify that the app has calculated your journeys correctly. If you have checked in additional travellers on your journey using Rejsekort as an app, this will also be visible in your travel and purchase history. The purpose is also to enable the Rejsekort Customer Centre to assist you if, for example, you notice an error in your journey.

Your travel history includes information about your completed journeys, including location data up to 5 minutes after the final destination, while your purchase history includes information about your completed payments.

If you pay for a user under the age of 18 in Rejsekort as an app, you will also be able to see the payment and general travel history in your own purchase history. Since users under the age of 18 cannot add a payment method themselves in Rejsekort as an app, they also do not have access to a purchase history, but they can access their travel history in the app.

#### **Information when contacting the Rejsekort Customer Centre**

If you contact the Rejsekort Customer Centre by phone, via the contact form in the app, or through the website, we will also store the personal data you provide in that context, to the extent it is relevant to your customer relationship.

If you contact the Rejsekort Customer Centre by phone, your calls will be recorded if you give explicit consent. The recordings are used for documentation and training purposes and are routinely deleted after 30 days.

### **3. Profiling for the purpose of detecting and preventing misuse of the app**

In the app, we use profiling to detect and prevent misuse of The Rejsekort-app.

Profiling is conducted by the app identifying misuse-like behavior during completed journeys. This occurs within the system, where each journey is automatically checked for signs of misuse-like behavior. The system assigns a score to all completed journeys based on whether the travel pattern indicates potential misuse. Previous behavior and scores are not considered in this calculation. Based on this, an overall point tally (a "fraud score") is generated for all customers, depending on their travel behavior. If a customer's overall fraud score becomes sufficiently high, it will be flagged in the system, after which a specific manual case review will take place. During the review of the overall point tally, previous behavior and scores will be taken into consideration.

Misuse-like behavior may result in sanctions, such as being blocked from using the app, based on a manual case review. Generally, sanctions will require that you have received one or more warnings related to the



observed behavior beforehand. In The Rejsekort-app, profiling thus serves as decision support for caseworkers, and no automated decisions are made.

### **3.1. Information about any profile blocking**

Under certain circumstances, we may block your profile in the event of abusive behavior. Read more about the rules for blocking in the Terms and Conditions for The Rejsekort-app, which you can find directly in the app and at [www.rejsekort.dk](http://www.rejsekort.dk) under "Terms and Conditions".

## **4. Who has access to personal data?**

Only employees with a work-related need at Rejsekort & Rejseplan A/S and at the data processors listed below have access to the collected personal data.

This includes employees at:

### **Transport operators**

Relevant staff at affiliated transport operators have access to information necessary to manage and support your customer relationship. This includes your travel and payment history, as well as your personal details such as name, date of birth, contact information, etc.

Transport operators include:

- GoCollective
- DSB
- Metroselskabet
- Fynbus
- Movia
- Nordjyllands Trafikselskab
- Midttrafik
- Sydtrafik

### **IT suppliers**

Our IT suppliers act as data processors and have therefore signed data processing agreements and confidentiality declarations, committing them to comply with data protection regulations and to process your data only in accordance with our instructions.

Our IT supplier Fairtiq provides and operates Rejsekort as an app and its related systems. In addition, we use the IT suppliers MailJet, Amazon Simple Email Service, and LINK Mobility for sending emails and SMS messages to Rejsekort users, as well as VIPPS MobilePay, Billwerk+, and Lector for payment handling and other case processing.

### **4.1 Disclosure of personal data**

Where relevant, we disclose necessary personal data—such as travel history, journey price, and journey number (but not GPS coordinates)—in pseudonymised form to the affiliated transport operators for the purposes of revenue sharing and settlement, as well as for their own handling of financial matters, traffic analysis, and planning pursuant to the Danish Public Transport Companies Act.

Where relevant, we also disclose necessary personal data in directly identifiable form to affiliated transport operators for their independent handling of penalty fare cases, debt collection, customer complaints, travel time guarantee cases, and financial matters. We disclose this personal data on the legal basis of Article 6(1)(f) of the GDPR, as Rejsekort & Rejseplan A/S and the relevant transport operators have a legitimate interest in safeguarding and recovering claims under agreements made with customers, and this interest overrides the interests of the individual customers.

Similarly—and only where relevant—we disclose your personal data to public authorities, primarily the Danish Transport Authority (Trafikstyrelsen), which is responsible for allocating certain public transport revenues.

We disclose relevant information about you, such as name, address, phone number, email address, and case number to the research institutes Wilke, Epinion, and Axcessnordic for the purpose of conducting customer satisfaction surveys on our behalf. Participation in such surveys is voluntary. These research institutes are required to delete the personal data once the task has been completed. We assess that we are

legally permitted to disclose the necessary personal data to the named institutes, as the surveys are carried out for a compatible purpose, which supports the continuous improvement of customer relationships, including our services and processes.

In addition, we may disclose personal data in certain situations for research purposes. We only do so if we determine that such disclosure is lawful, serves a legitimate and objective purpose, and is ethically justifiable. Furthermore, we ensure that the disclosed data is protected to the greatest extent possible, including through pseudonymisation where full anonymisation is not feasible.

## 5. How and for how long do we store information about you?

We store your personal data in IT systems with controlled and restricted access and on servers located at AWS Amazon in Ireland. We also secure your personal data with appropriate technical and organisational security measures from the time of registration until deletion. We delete your personal data as soon as we no longer need it to fulfil the purpose for which it was collected.

We store information about you as a customer for as long as it is necessary for the purposes mentioned in section 2, cf. the table below:

Type of personal data	Storage time	Legal basis
Master data (name, age, etc.)	For as long as you are our customer and until 5 years after the end of the year in which the customer relationship has ended (or customer relationship without activity)	As long as you are our customer, GDPR art. 6(1)(b). Then section 12 of the Danish Bookkeeping Act.
Contact details (email and phone number)	For as long as you are our customer and until 3 years after your last trip	As long as you are our customer, GDPR art. 6(1)(b). After the end of the customer relationship in accordance with GDPR article 6(1)(f), as we assess that we have a legitimate interest in being able to document this information in connection with any claim you may make against us up to the limitation period of 3 years, cf. § 3 of the Limitation Act.
Information that you, as an adult, have been age-validated (confirmed to be at least 18 years old) in connection with adding a child to your profile	As long as you are a customer with us, since the information solely enables the option of registering a child under 18 years of age.	As long as you are a customer with us, GDPR Art. 6(1)(b).
Information selected customer type, number and types of customers on multiple travellers and price.	5 years from the end of the year to which the transaction relates.	GDPR Art. 6(1)(b) and Section 12 of the Bookkeeping Act
Information about your travel data, including location information (GPS) and activity data (e.g. check-in in Ballerup on 21 October 2024 at 12:03 - check-out at Østerport on 21 October 2024 at 12:30)	We store travel data for 3 years from the time the data is registered. After that, travel data is stored in anonymised form for analysis purposes.	GDPR Art. 6(1)(f), as we consider that we have a legitimate interest in being able to document this information and the calculated route and price in connection with any claim you may make against us up to the limitation period of 3 years, cf. section 3 of the Danish Limitation Act
	Location and activity data collected during a second transport (such as a bicycle or	GDPR Art. 6(1)(f), as we consider that we have a legitimate and objective interest in detecting and

	<p>car) between two means of transport (public transport) and which is exceeding 30 minutes is deleted after 2 months for data beyond 5 minutes after the final destination for the first means of transport and up to 5 minutes before the start of the journey for the next means of transport. After that, this data is deleted in the system and stored for another 2 months in backup for technical reasons. Other journey data related to public transport is stored as stated above for 3 years.</p>	<p>preventing fraud with the app as well as making system improvements and fixing system errors for the benefit of all public transport travellers.</p>
<p>Location information and activity data related to the period from final destination to check-out (i.e. not related to travelling by public transport)</p>	<p>We store your location and activity data for 2 months from the end of your journey until check-out.</p> <p>We store the data in order to:</p> <ul style="list-style-type: none"> <li>- detect and prevent misuse of The Rejsekort-app and</li> <li>- to make system improvements (data is stored in directly personally identifiable form)</li> <li>- to make changes due to system errors (data is stored in pseudonymised form).</li> </ul> <p>After the time period, the data is deleted in the system and stored for a further 2 months in back-up for technical reasons</p>	<p>GDPR Art. 6(1)(f), as we consider that we have a legitimate and objective interest in detecting and preventing fraud with the app as well as making system improvements and fixing system errors for the benefit of all public transport travellers.</p>
	<p>30 days after your trip, we store your location and activity data for the period from the end of your trip until check-out for customer service purposes.</p>	
<p>Case information registered when contacting the Rejsekort Customer Service by phone or contract form in app or on website</p>	<p>3 years from the registration of the data.</p>	<p>GDPR Art. 6(1)(f), as we consider that we have a legitimate interest in being able to document this information in connection with any claim you may make against us up to the limitation period of 3 years, cf. § 3 of the Danish Limitation Act.</p>
<p>Recordings of phone conversations in the Rejsekort Customer Centre</p>	<p>30 days from the time of recording.</p>	<p>Your consent, cf. GDPR Art. 6, para. 1 lit. a</p>

These deletion deadlines may, after a specific assessment, be deviated from so that the personal data is deleted at an earlier or later date if there are specific, objective reasons for this. This may be the case, for example, if you request deletion without ever having used the app to buy a ticket/ticket dokument. In such a case, deletion of your data may take place earlier than the time specified in the form. If, on the other hand, a case is pending before the courts, the specified retention periods may be extended after a specific assessment.

#### Transfer of data to 3rd countries

We only store data on servers located within the EU. However, we have suppliers based outside the EU, in Switzerland and the United States, respectively. The supplier in the US is affiliated with the EU-U.S. Data Privacy Framework, and is thus subject to the EU Commission's adequacy decision from July 2023. Switzerland is also on the EU Commission's list of secure third countries.

## **6. Legal basis for processing operations**

We process your personal data based on the following legal grounds:

- When necessary to fulfil an agreement with you (Article 6(1)(b) of the General Data Protection Regulation). This basis applies to the ongoing customer relationship when you are registered as a customer in the app.
- When necessary for us to comply with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation). This basis applies because we are required to store information about, among other things, financial transactions pursuant to section 12 of the Danish Bookkeeping Act.
- When you have given consent to the processing (Article 6(1)(a) of the General Data Protection Regulation). This basis applies to telephone recordings made in connection with customer enquiries to the Rejsekort Customer Centre.
- When necessary for us to pursue a legitimate interest (Article 6(1)(f) of the General Data Protection Regulation). This basis applies to our processing of data for the following purposes:
  - Identifying and preventing misuse, cf. section 3. The legitimate interest behind the processing is the identification, prevention, and management of misuse in the app. We assess that this purpose is legitimate and that the processing is proportionate to achieving it.
  - Processing location data collected by the app that is not related to your journey by public transport. This includes location data collected if you fail to check out after completing your journey. This processing ensures that the Rejsekort Customer Centre can correct data, analyse whether route calculation is functioning correctly, and prevent and manage fraud. We assess that these purposes are legitimate and that the processing is proportionate to achieving them.
  - Disclosure of information, cf. section 4.1. The legitimate interest behind the disclosure is to support the lawful and legitimate purposes pursued by the recipients of the data.

## **7. Your rights**

Under the General Data Protection Regulation (GDPR), you have a number of rights regarding our processing of your personal data. If you wish to exercise any of these rights, please contact us. See our contact information under section 1 above.

### **Your rights include:**

#### **Right of access**

You have the right to access the personal data we process about you.

#### **Right to rectification**

You have the right to have inaccurate information about yourself corrected. You also have the right to supplement your data with additional information if it would make your personal data more complete and/or up to date. You can edit your profile information directly in the app.

#### **Right to erasure**

In certain cases, you have the right to have your data deleted before our standard general deletion timeframe.

**Right to restriction of processing**

In some cases, you have the right to have the processing of your personal data restricted. If this right is exercised, we may only process the data – aside from storage – with your consent, or for the establishment, exercise or defence of legal claims, or for the protection of another person or important public interests.

**Right to object**

In certain cases, you have the right to object to our otherwise lawful processing of your personal data. This only applies when the processing is based on Article 6(1)(f) of the GDPR (legitimate interest). As described in this Privacy Policy, this concerns data processed to identify and prevent misuse. If you object, we may no longer process the data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or if the processing is necessary for the establishment, exercise or defence of legal claims. You also have the right to object to the processing of your data for direct marketing purposes.

**Right to withdraw consent**

If you have given consent, you have the right to withdraw it at any time. You can do so by contacting the Rejsekort Customer Centre using the contact information provided in section 1 above. If you withdraw your consent, it does not affect the lawfulness of any processing carried out before the withdrawal.

If you withdraw your consent, we will generally limit any future processing of your personal data by deleting or anonymising the data that was processed based on that consent. As stated above in section 2.1, this applies to recordings of telephone conversations made when contacting the Rejsekort Customer Centre by phone.

**Right to data portability**

In some cases, you have the right to receive your personal data in a structured, commonly used, and machine-readable format and to have this data transferred to another data controller without hindrance.

**Right to lodge a complaint with the Danish Data Protection Agency**

You may file a complaint about our processing of your personal data with the Danish Data Protection Agency.

The Danish Data Protection Agency can be contacted at:

Datatilsynet

Carl Jacobsens Vej 35

2500 Valby

Phone: +45 33 19 32 00

Email: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)

[www.datatilsynet.dk](http://www.datatilsynet.dk)

Mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)

[www.datatilsynet.dk](http://www.datatilsynet.dk)

**8. Changes to this privacy policy**

We regularly review this privacy policy to keep it updated and in line with the way The Rejsekort-app works as well as applicable principles and legislation. The privacy policy is subject to change without notice.

You can always see at the top of this Privacy Policy when the policy was last updated or changed.

Significant changes to the Privacy Policy will be published on our website [www.rejsekort.dk](http://www.rejsekort.dk) together with an updated version of the Privacy Policy.