

## **TCAT's Privacy Policy for Electronic Fare Media Program**

### **What is Personally Identifiable Information?**

TCAT will only ask you for personally identifiable information that is needed to provide you with the product or service that you have asked for--in this case, your decision to participate in our Electronic Fare Media Program. Personally identifiable information may include your name, address, telephone number, email address, date of birth, or other information that could reasonably be used to identify you.

### **Why Does TCAT Ask for Personally Identifiable Information?**

We will ask you for personally identifiable information in order to link your specific bus pass card to your account. This means that, if you lose your bus pass, we can deactivate your old card and issue you a new card. If you want to recharge your bus pass to save the new card fee, but you don't remember your bus pass number, we can use your previously provided personally identifiable information to look you up in our system.

### **What Are Aggregate Ridership Statistics, and Why Does TCAT Use Them?**

Another type of information that TCAT collects is aggregate ridership statistics. For example, we calculate the total number of passengers riding each route to plan our bus routes. We calculate the average number of passengers boarding at each bus stop to improve our passenger amenities at stops. We calculate the average number of riders per bus trip to decide how many buses to put on a route. Except as described below, TCAT will not track individual riding habits or histories--only the overall patterns of our thousands of daily riders.

### **Will TCAT Disclose or Track My Personal Information or Riding Habits or History?**

If you choose to purchase a bus pass and join our Electronic Fare Media Program, TCAT will not sell, trade or rent your personal information to others. In addition, TCAT will NOT link personally identifiable information with personal riding statistics or disclose your personal information to others, except in very limited circumstances:

- 1) When requested by the owner of the card;
- 2) For technical troubleshooting purposes (to identify and troubleshoot erroneous transactions in response to a card owner complaint);
- 3) In connection with an investigation of possible fraudulent activity involving the card;
- 4) In connection with contemplated or ongoing legal or administrative proceedings, a subpoena, court or administrative order, or matters involving threat of imminent harm to you or others or property damage.

In the fourth case above, we also commit to:

- 1) Seek to limit the scope of the disclosure to that which is reasonably required to fulfill the purpose of the disclosure;
- 2) Seek to restrict such disclosures only to appropriate authorities;

3) Undertake reasonable efforts to notify you as far in advance as reasonably possible of such a disclosure (or a request for disclosure), unless: instructed otherwise by a court or other authority with appropriate jurisdiction, or the disclosure is in connection with a criminal investigation or proceeding.

TCAT may also release information to your employer if your participation in the Electronic Fare Media Program is coordinated, sponsored, or funded by your employer and disclosure is needed to comply with the employer's request for information.

### **What Happens To My Online Credit Card Information?**

If you choose to pay for your bus pass by using a credit card online, you will do so through a website hosted by a third party. Use of the information you provide will be governed by the privacy policy of the operator of the third party site.

### **Can I Update or Remove My Information?**

You may choose to correct, update, or delete the information you have submitted to us by updating your user account online or by calling us at 277-RIDE. However, please understand that deleted information may continue to exist in backup files or media.

### **Is My Personal Information Secure?**

TCAT uses industry standard security measures to protect the loss, misuse and alteration of the information under our control. We protect personal information using Secured Socket Layer (SSL) connections. Although we make good faith efforts to store information collected by TCAT in a secure operating environment, we cannot guarantee complete security.

### **How Can I Learn of Privacy Policy Changes?**

TCAT's Privacy Policy may change from time to time. If TCAT makes any substantive changes, TCAT will post notice of changes on this page. Our use of information gathered while this current policy is in place will always be consistent with this current policy, even if we change the policy later.

### **What If I'm Not Comfortable With TCAT's Privacy Policy?**

Remember: it's your choice whether you join our Electronic Fare Media Program. We think that the convenience and benefits of this program are outstanding, but in the end, it's your choice. If you are uncomfortable with our privacy policy, you have two options.

First, you always have the option of paying cash for your bus fare. Paying cash fare for a bus fare means that absolutely no personally identifiable information will be collected or stored, although TCAT will still include your ride in aggregate statistical analysis.

Second, you may use an unregistered Electronic Fare Media. Any Electronic Fare Media issued by TCAT (i.e. TCards, key fobs, and sticker tags) may be used unregistered. Please note the serial number on your Electronic Fare Media; you will need to provide your serial number to recharge the Electronic Fare Media with additional passes. To protect against fraud, you may not be able to deactivate your lost or stolen unregistered Electronic Fare Medium.