

# Privacy Policy pursuant to Article 13 and 14 GDPR

This is the privacy and cookie policy for the use of the digital services and online purchases of Wiener Linien. They include the online ticket shop of Wiener Linien (“browser version” – accessible at [shop.wienerlinien.at](http://shop.wienerlinien.at)) and the mobile application for Android and iOS WienMobil.

Definitions:

Personal data (hereinafter also referred to as data) is information about a person whose identity is determined or at least determinable. This includes, for example, your name, your contact details, your e-mail address, but also your IP address.

Processing or data processing means any operation or set of operations which is performed upon data, whether or not by automatic means, such as collection, recording, organisation, filing, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller is the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data.

Processor is a natural or legal person, public authority, agency or other body that processes personal data on behalf of the controller, e.g. external IT service providers.

## 1. Data processed during use

1.1. By using the digital services, you acknowledge the data processing procedures for the use of the digital services and for the online purchase of your ticket. The operator reserves the right to change the privacy policy if required by law. The privacy policy that apply are always those that can be accessed at the time of using the digital services.

1.2. If you create a new account (please note that regardless of whether you create an account in the WienMobil service or using the online ticket shop, you can use this account for both services), personal data, such as your name, your e-mail address, your date of birth, address as well as your phone number (optional) will be stored. In addition, the time of registration will be stored.

If you do not wish to create an account, you can only use the browser version of the online ticket shop. In this case, only your personal data (customer and order data) will be stored in connection with your purchase.

1.3. When using the WienMobil app, in the event of your explicit consent, which you give to our IT service provider (Upstream - next level mobility GmbH) when opening the app for the first time, your position data, allocation to age categories (classification in 10-year steps) and your device meta data (device designation, operating system, operating system version, app version) may be processed; you may revoke your consent at any time in the manner described in section 3.6.

1.4. If you use the feedback function in WienMobil, your requests and any photographs that you might sent as well as your device metadata (device name, operating system, version of the operating system, app version) will be processed.

## **2. Data processed during purchase**

- 2.1. With every purchase of a product of Wiener Linien, regardless of whether you have created an account or not, the data provided by you (first and last name, academic title, date of birth, e-mail address, residential address or invoice address, phone number, if applicable) will be stored. In addition, the mode of payment selected by you will be stored. If you fail to enter data in the fields marked as mandatory, we will be unable to conclude a contract with you. The time of a purchase will also be stored.

Please note that no credit card data, such as credit card numbers, will be stored in systems of Wiener Linien. You also have the option to store your credit card data; if you use this function, only a reference number will be stored based on which the used payment provider can verify the payment data for the next purchase. It is possible to delete the stored payment method when making a purchase in the digital sales channel.

- 2.2. When using the “Annual ticket service” in the online ticket shop, a photograph and bank account details (if you choose the option annual/monthly debit order) are additionally required for the annual ticket. All your data will also be stored in the application for annual ticket management.
- 2.3. When purchasing tickets for students (semester ticket), your student registration number as well as the name of the university where you are enrolled will be stored. All your data will also be stored in the application for semester ticket management.
- 2.4. If the invoice recipient is different from the purchaser, the name and address of the invoice recipient will be stored.
- 2.5. To be able to maintain the connection to your device, your IP address and your device metadata (device name, operating system, operating system version, browser type, app version) will be stored.

## **3. Purposes of processing**

- 3.1. The data disclosed by you during registration will only be processed for maintaining the accounts.
- 3.2. Should you purchase a product of Wiener Linien via the digital services, the data required for the purchasing process and disclosed by you (purchase data) will be used and stored directly in the Wiener Linien online ticket shop or, if you purchase an annual ticket or semester ticket, will be stored in the application for annual ticket and semester ticket management and only to the extent necessary for contract fulfilment, specifically for processing the purchase, the contract administration, for complying with the legal requirements for records retention as well as, in the case of an annual ticket order, for printing the card.
- 3.3. Individual purchase transactions are evaluated for problem analysis and correction on the basis of our legitimate interest in technical and support purposes.
- 3.4. In order to protect against fraudulent services, information about cancelled purchase transactions carried out via an account and the account itself is collected. This is done on the basis of the payment conditions set out in the General Terms and Conditions and our legitimate interest in fraud protection.

- 3.5. Data that you provide when contacting us will only be used to respond to your inquiry or for improvement purposes.
- 3.6. In the event of your explicit consent, Wiener Linien will use the data provided by you during, but also after, the existence of contractual relationships in order to contact you about offers and innovations by post, e-mail, telephone/SMS, social media channels or apps (marketing purposes). You can withdraw or deactivate your consent to the processing of your personal data for marketing purposes at any time in your profile (“Personal data”).
- 3.7. Provided that you give your explicit consent, your personal data, specifically name, address, contact data, contract, invoicing, usage and consumption data, commercial indicators, customer contact behaviour and response behaviour for the purpose of ensuring data quality, consistency and up-to-dateness, as well as for the purpose of new product development, the categorisation of customers in groups and subsequent marketing in respect of the delivery of products and services in the energy, telecommunication, building management, IT, funeral and mobility areas during and after the termination of this contract exclusively within the Wiener Stadtwerke group will be submitted to the following companies for above mentioned purposes: WIENER STADTWERKE GmbH, WIEN ENERGIE GmbH, WIEN ENERGIE Vertrieb GmbH & Co KG, Wiener Netze GmbH, WIENER LINIEN GmbH & Co KG, WIPARK GmbH, Aktiengesellschaft der Wiener Lokalbahnen, Wiener Lokalbahnen Verkehrsdienste GmbH, Upstream - next level mobility GmbH, FACILITYCOMFORT Energie- und Gebäudemanagement GmbH, BESTATTUNG WIEN GmbH, Friedhöfe Wien GmbH, WienIT EDV Dienstleistungsgesellschaft mbH.

Marketing includes, among others, direct marketing via electronic means or other media, such as mail items, e-mails, SMS/MMS or phone calls. You can withdraw or deactivate your consent to the processing of your personal data for marketing purposes at any time in your profile (“Personal data”).

- 3.8. Provided that you give your explicit consent to the processing of the anonymised data listed under Section 1.3., Upstream – next level mobility GmbH, 1030 Vienna, Thomas-Klestil-Platz 13, may use this data for analyses and statistical evaluations on traffic flow level for storage and commercial use and exploitation as well as for improving the service of the WienMobil app, and may transmit it to Wiener Linien GmbH & Co. KG.

You can withdraw your consent to this processing at any time in WienMobil under “Settings/General/Share usage data”.

#### **4. Data transmissions**

- 4.1. If payments are made by debit order, your payment relevant data for the purpose of payment will be transmitted to our bank.
- 4.2. Due to the new Payment Service Directive, all your personal data will be forwarded to our external financial service providers in encrypted format if payments are made by credit card or via PayPal.
- 4.3. In the case of semester tickets, your student registration number, your date of birth, your postal code (if your main residence is in Vienna) and your name will be sent to Bundesrechenzentrum GmbH, A-1030 Wien, Hintere Zollamtsstraße 4, or the associated tertiary education institutions to verify entitlement.

- 4.4. If you are in arrears with the payment of tickets (e.g. annual tickets), the data provided by you will be forwarded to a debt collection agency or a legal representative for further legal action.
- 4.5. In addition, your data (name and address) will be forwarded to the shipping company contracted by us for delivering the items as well as to our tax consultant/auditor (purchase data) for complying with our fiscal obligations.
- 4.6. The data related to your annual season ticket (name, date of birth, address) will be forwarded to Verkehrsverbund Ost-Region (VOR) Gesellschaft m.b.H. for the purpose of contract execution.

## **5. Legal bases**

- 5.1. The data will be processed based on the legal provisions pursuant to Article 6(1)(a) GDPR (Consent), Article 6(1)(b) GDPR (necessary for contract execution) and/or Article 6 (1)(f) GDPR (legitimate interests).

## **6. Deletion/ Storage period**

- 6.1. In principle, your personal data will be stored for as long as it is necessary in relation to the purpose it was collected for. Additionally, your personal data will be stored for as long as legal obligations require the processing or the retention is necessary for the establishment, exercise or defence of legal claims.
- 6.2. Your account will be stored until you object. You can request the deletion of your account at any time by sending an e-mail to [ticketshop@wienerlinien.at](mailto:ticketshop@wienerlinien.at) or by letter to Wiener Linien GmbH & Co KG, Department for Sales & Consulting, 1030 Vienna, Erdbergstraße 202.
- 6.3. Due to retention requirements for tax relevant records, your purchase or order data in connection with services provided by Wiener Linien will be deleted after 7 years. This period starts upon expiry of the calendar year in that the purchase was made. This also applies if you create or abort an order. The photograph provided by you for the issuing of the annual ticket will be deleted 3 months from effectiveness of the contract termination.
- 6.4. Data that you provide when contacting us will be deleted after 7 years at the latest. This period begins with the end of the calendar year in which the request was made.
- 6.5. Your browser type will be deleted upon completion of your order process. Your IP address will be deleted after 12 months.
- 6.6. Purchase transactions for error analysis and correction will be deleted after six months at the latest.

## **7. Cookies**

- 7.1. The website of our ticket shop ([shop.wienerlinien.at](http://shop.wienerlinien.at)) uses cookies to store certain information. Cookies are text files transmitted by a website on your hard drive or your mobile device. Cookies identify the device of a user, but do not identify the user personally.

We use cookies in order to structure our offer in a more user-friendly manner. They enable us to recognise your browser the next time you visit our website.

If you do not agree to this, you can adjust your browser settings so that you will be informed on the placing of cookies and can accept these only in individual cases.

For using the services with a browser, functional cookies have been activated as they are required and necessary for the basic functions of the website. Areas such as login, shopping cart, display and administration of your products and the cashier only work with these cookies. These also include functional flash cookies for diverse confirmation and error messages. All these cookies contribute to a convenient, secure and compliant use of the website.

If these cookies are disabled, the functionality of our website might be restricted.

Our website uses functions of the web analysis service etracker GmbH, D-20459 Hamburg, Erste Brunnenstraße 1. This service uses cookies to enable the analysis of your use of the website.

You can change your browser settings to not store any cookies.

Cookie overview:

<b>Name</b>	<b>Type</b>	<b>Purpose/content</b>	<b>Validity</b>
Shop	Function	consists of a randomly generated string of numbers and letters; it is used as the session data cookie for the shop. It serves to permit the user to resume the same session with each step even when they are redirected to an external page (Payment). However, the actual session data is not stored on the cookie itself but on the server.	Session
_et_coid	eTracker	consists of a randomly generated string of numbers and letters; it serves for anonymous identification of a user and its user behaviour for statistic reporting purposes	2 years
et_id	eTracker	consists of a randomly generated string of numbers and letters; it serves for anonymous identification of a user and its user behaviour for statistic reporting purposes	2 years

## **8. Functions of WienMobil app**

8.1. The WienMobil app is available via the known app platforms. The installation and full use require a valid account with the corresponding app platform as well as an adequate client device. We do not have any influence on the way in that personal data is used in connection with the respective app platform software. The operator of the app platform is exclusively responsible for this. For information on data privacy of these stores or any area directly connected with these, please consult their privacy policy:

- Apple app store: [Apple Privacy Policy](#)
- Google Play Store: [Google Privacy Policy](#)

## 8.2. Google Firebase

We use Google Firebase in the WienMobil app. Google Firebase is part of the Google Cloud platform and offers diverse services for app developers in respect to the development, quality control and the improvement of apps.

Using the service provided by Google Firebase we process your data with the aim to continuously analyse the usage of the WienMobil app in order to improve the service stability and usability of the app for our users. For this service Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland is our processor.

Firebase is used to collect information on the usage of our application. This information is transmitted to Google and stored in a computer centre within the European Union. However, we cannot exclude that the usage data is transmitted to Google LLC in the USA or is transmitted by Google subprocessors in third countries (pursuant to Article 45 or Article 46(2) GDPR). Wiener Linien is not able to draw conclusions about a specific user. Accordingly, no personalisation or linking with your user data takes place.

For more information on the protection of your data in Firebase and the agreements concluded with Google regarding the processing of data visit: [Privacy and Security in Firebase](#).

In the following, we would like to inform you about the Firebase functions that we use in the WienMobil app.

### 8.2.1. Firebase Cloud Messaging

We use Firebase Cloud Messaging to be able to send you push notifications with information on current interruptions. Push notifications are messages that are displayed on your device without opening the app.

During the installation of the app, a pseudonymised reference ID (Firebase installation ID) is assigned to your mobile device, which serves as the target for the Push notifications. When you uninstall the app, this ID will still be used for a certain period after which it will be deleted permanently. Should you reinstall the app, a new ID will be assigned to your mobile device.

You can (de)activate this function yourself in the setting of your mobile device at any time. If you deactivate the function, you will not receive any notifications on interruptions.

The lawfulness of processing is the legitimate interest pursuant to Article 6(1)(f) GDPR. The legitimate interest pursued is being able to send you information on interruptions.

For more information on Firebase Cloud Messaging, specifically the processing period, please refer to the Privacy Statement of Google Firebase: [Data Processing and Security Terms](#).

### 8.2.2. Firebase Remote Configuration

Firebase Remote Configuration is used for configuring and sending important, up-to-date notifications, e.g. to be able to show you information on error messages or maintenance in the app. The notifications are only displayed when you have opened the app.

During the installation of the app, a pseudonymised reference ID (Firebase installation ID) is assigned to your mobile device. Remote Configuration uses the Firebase installation IDs to select configuration values and sent notifications to the respective client devices. When you uninstall the app, this ID will still be used for a certain period after which it will be deleted permanently. Should you reinstall the app, a new ID will be assigned to your mobile device.

The lawfulness of processing is the legitimate interest pursuant to Article 6(1)(f) GDPR. The legitimate interest pursued is being able to display important information for you in the app.

For more information on Firebase Remote Configuration, specifically the processing period, please refer to the Privacy Statement of Google Firebase: [Data Processing and Security Term](#).

#### 8.2.3. Firebase Crashlytics

We use Firebase Crashlytics to control and promptly remedy any errors that might occur in our app.

Should the app crash, certain information on the crash such as time of the crash, device type, operating system and other technical data (including installation UUID and crash traces) of your mobile device will be sent to Crashlytics. These crash reports do not include the IP address or personally identifiable information.

The lawfulness of processing is the legitimate interest pursuant to Article 6(1)(f) GDPR. The legitimate interest pursued is being able to continuously improve the app to offer you an error-free and functional application.

For more information on Firebase Crashlytics, specifically the processing period, please refer to the Privacy Statement of Google Firebase: [Data Processing and Security Term](#).

#### 8.2.4. Firebase Performance Monitoring

We use Firebase Performance Monitoring to obtain information on the performance of our app. This enables us to determine whether issues occur with specific user segments, and to respond to these if necessary.

Certain information about your device, information on the app, network information and other technical data (including Firebase installation ID) will be sent from your mobile device to the performance monitoring. In addition, Google uses your IP address to allocate performance incidents to the countries where they originate. Google provides us only with anonymised information that cannot be used to identify a person.

The lawfulness of processing is the legitimate interest pursuant to Article 6(1)(f) GDPR. The legitimate interest pursued is being able to continuously improve the app to offer you an error-free and functional application.

For more information on Firebase performance monitoring, specifically the processing period, please refer to the Privacy Statement of Google Firebase: [Data Processing and Security Term](#).

#### 8.2.5. Dynamic Firebase links

The links permit the linking in a specific area within the app or respectively permit the use of an external link to access the desired app area directly and transmit information to the app in the process.

Here, only device specifications and IP addresses of IOS end devices are processed for a short period of time and solely to provide of the service.

The lawfulness of processing is the legitimate interest pursuant to Article 6(1)(f) GDPR. The legitimate interest pursued is being able to continuously improve the app to offer you an error-free and functional application.

For more information on Dynamic Firebase links, specifically the processing period, please refer to the Privacy Statement of Google Firebase: [Data Processing and Security Terms](#).

#### 8.2.6. Google Analytics for Firebase

Provided that you give your consent, Wiener Linien uses the Google Analytics service for Firebase to process anonymised usage data. This data will not be linked with your account data, accordingly, we are unable to use it to identify a specific person.

The following usage data will be processed for improving and continuously optimising the WienMobil app and will be stored for a period of 14 months:

- Data on the frequency of use provide us with information on the general acceptance of the app and whether developments will result in more frequent or longer use.
- Information on session/visiting periods help us to detect shortcomings in the usability and optimise contents.
- Used buttons and viewed contents permit us to improve frequently used features and to optimise the accessibility.
- Screen flows or the sequences of the use of individual screens help us to better understand cases of use and objectives of our users and to accelerate frequently used sequences in the app.
- For some evaluations, we make use of demographic characteristics provided by Google to gain a better understanding of our target group.

The lawfulness of processing is your consent pursuant to Article 6(1)(a) GDPR.

You can withdraw your consent to this processing at any time in the WienMobil app under "Settings/General/Share usage data".

Your decision not to give your consent has no direct effect on the function of the app. However, the lack of statistical data makes the further development of the WienMobil app more difficult for us.

For more information on Google Analytics for Firebase, specifically the processing period, please refer to the Privacy Statement of Google Firebase: [Data Processing and Security Terms](#).

### 8.3. Google Maps

We use the service of Google Maps to process your personal data for the purpose of displaying interactive maps in our app. Google and we are joint controllers. You can view the agreement concluded with Google [here](#). The use of Google Maps allows us to display the route selected by you, our stations as well as the locations of the offered mobility services in the map.

When using Google Maps, your user data (e.g. location and movement data), your IP address and the (start) address entered by you are transmitted to Google. The collected data is used exclusively for creating the map.

You can deactivate the location access by Google and GPS at any time in the location settings of your device. In that event, you will only have restricted use of the map function.

The lawfulness of processing the data is Article 6(1)(1)(b) and (f) GDPR in conjunction with Article 46(2) GDPR.

Google is the exclusive controller to the extent to that Google processes the data beyond this, in particular as part of Google's advertising network.

For more information please refer to Google's [Privacy Statement](#). You can also find additional information on your rights in this regard and the setting options to protect your privacy there. Please note that we do not have any knowledge of the contents of the transmitted or stored data or of its use by the service.

### 8.4. YouTube

Under the menu item "Service/tutorial videos (Youtube)", you can find a few videos with easy explanations on how to use our app. For this purpose, we use the YouTube service. Clicking on the menu item will establish a direct connection with the Youtube server. When you open the menu item, you consent to the transmission of data to Google.

Provided that you give your consent, we, with the YouTube service, Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, process connection data to be able to play our videos for you. Please note that Youtube may process your user data outside the European Union. This may result in increased risks for the user as e.g. subsequent access to the user data might be difficult. In addition, we do not have access to this user data. Access is exclusively reserved to YouTube.

Google is the exclusive controller to the extent to that Google processes the data beyond this, in particular as part of Google's advertising network.

The lawfulness of processing of the data is your consent pursuant to Article 6(1)(a) in conjunction with Article 49(1)(a) GDPR.

For more information please refer to Google's [Privacy Statement](#). You can also find additional information on your rights in this regard and the setting options to protect your privacy there. Please note that we as the provider of the site will not have any knowledge of the contents of the transmitted or stored data or its use by the service.

## **9. Data security**

Wiener Linien implements adequate technical and organisational measures to protect your personal data and to prevent unauthorised access to or disclosure of this data.

## **10. Other processors**

Wiener Linien uses the following categories of processors:

- Server hoster
- Technical service provider for the operation of the online ticket shop
- Technical service provider for the management of annual season and semester passes
- Technical service provider for the operation of WienMobil
- Payment provider/financial service provider
- Web analyst
- Shipping companies
- Analysis and optimisation tools

## **11. Your rights**

### 11.1. Right of access

You have the right to request access to the personal data stored on you.

### 11.2. Right to rectification

Should your data be incorrect or incomplete you have the to rectification or completion.

### 11.3. Right to object

If your personal data is processed based on legitimate interests, you have the right to object to such processing. Unless there are any legitimate reasons for the processing on our side, the processing of your data based on that lawfulness will be discontinued. The objection will not affect the lawfulness of the data processed before such objection.

### 11.4. Right to withdraw consent

If the data processing by Wiener Linien GmbH & Co KG is based on your consent, you may withdraw such consent at any time. The withdraw will not affect the lawfulness of data processed before such objection.

### 11.5. Right to erasure

Equally, you may demand the erasure of your data under certain circumstances, e.g. if the data is no longer required for the purpose for that it was collected and/or processed.

### 11.6. Other rights

You may demand to restrict the use of your data. This is e.g. possible in cases where you have revoked your consent to the use of the data and no decision was yet made on this revocation. As a consequence of such restriction, the data will only be stored, but will not be processed in any other way.

If the lawfulness of the processing of your personal data is based on your consent or a contract concluded with you, you additionally have the right to data portability.

#### 11.7. Exercise of your rights

To exercise your rights, please send an e-mail to [dataschutz@wienerlinien.at](mailto:dataschutz@wienerlinien.at) or a letter to Wiener Linien GmbH & Co KG, Department of Compliance & Checks, Erdbergstraße 202, 1030 Vienna.

Please note that your identity must unambiguously be determined for processing your request. In case of doubt, we will request you to sign your request and to attach or submit a copy of your identity document with photograph.

#### 11.8. Right of appeal to the data supervisory authority

In addition, you have the right to submit a complaint to the data supervisory authority; you may exercise this right in the event of any data privacy violations. You can find more information on the data supervisory authorities in the European Union [here](#).

## 12. Controller and Contact

12.1. Your customer, account and contract data can be viewed in the online ticket shop after registering.

12.2. For more information please contact:

Wiener Linien GmbH & Co KG  
z.H. Abteilung Vertrieb und Beratung  
Erdbergstraße 202  
1030 Vienna  
Tel.: +43 (0)1 7909 100  
Fax: +43 (0)1 7909 73009  
e-mail: [tarif@wienerlinien.at](mailto:tarif@wienerlinien.at)