

# SESTRAN REGIONAL BUS STRATEGY - SURVEY PRIVACY NOTICE

## Research Summary

The South East Scotland Regional Transport Partnership (SEStran) has commissioned SYSTRA Ltd (SYSTRA) and Stantec Ltd (Stantec) to conduct a survey of people living or travelling in the South East of Scotland. The survey aims to understand perceptions of the current bus network and explore potential improvements. Findings will help guide the development of the SEStran Regional Bus Strategy.

## About this notice

- SYSTRA and Stantec have been commissioned by SEStran to conduct an online survey with those living and/or travelling in the South East of Scotland area.
- SYSTRA and Stantec are committed to making sure that we tell you about the ways in which we use your information, and that we have the right controls in place to make sure it is used responsibly and kept safe from inappropriate access, theft, or misuse.
- This notice explains what data we collect, how we use it, and your rights under the UK General Data Protection Regulation ("GDPR").

## Your Data

- Personal data is information relating to a living individual who can be identified by it, either alone or combined with other information.
- The processing of personal data, including special category data, is governed by the UK General Data Protection Regulation ("GDPR"), and associated legislation including but not limited to the Data Protection Act 2018.
- This survey does not collect personally identifiable data (such as names or contact details). Some special category data (such as ethnicity, gender identity, health or disability status) is collected on a voluntary basis.

## Who are we?

- SEStran is the *Data Controller* for the survey data. As the commissioners of this research, SEStran have defined the purposes, scope and intended use of the data collection.
  - SEStran will only receive anonymised data on this research, they will not receive any personally identifiable information.
- SYSTRA is the *Data Processor*, meaning they are responsible for collecting, storing, and processing survey data on SEStran's behalf.
  - SYSTRA will ensure that survey responses are anonymised before undertaking analysis.
  - SYSTRA is Cyber Essentials Plus accredited (certificate number: dab9e159-8a80-4f99-909d-25cbb12e8db7) and a Market Research Society (MRS) Company partner.
- Stantec are also a *Data Sub-Processor*, as they are undertaking specific survey data collection, storage, and processing tasks on behalf of SYSTRA.
  - Stantec are certified to ISO 27001:2022 and UK Cyber Essentials Plus accredited.
  - Stantec's role on this project is to aid in the analysis of survey responses from participants.
- In certain circumstances, if a respondent cannot take the online survey, SEStran, SYSTRA, or Stantec may collect data by phone. All responses are anonymised before analysis, and any original paper records will be securely destroyed after being digitised and stored in electronic form on a secure UK or EU based server.

## How are we collecting information?

- The online survey is administered by SYSTRA over a four-week period. This survey will take an average of 15-30 minutes to complete.
- A phone survey is available by request if you cannot access the survey online. In this event, SYSTRA, Stantec or SEStran will collect the data with consent of the respondent and your responses will be anonymised by the collector before analysis.
- Your participation is voluntary, and you can withdraw at any time before submitting your completed survey. After submission, your data is anonymised and cannot be withdrawn.

## What information is being collected?

- The survey collects some demographic and special category (sensitive) data. All such questions are voluntary. This may include:
  - Age
  - Employment status
  - Local Authority area of residence
  - Gender identity (including non-binary/self-description)
  - Trans status or history
  - Ethnicity
  - Disability or health condition (and how it affects daily life)
  - Religion or belief
  - Sexual orientation
- Most questions are about your travel experiences and views on improving transport in South East Scotland.
- You may skip any question related to demographic and special category (sensitive) data, or answer 'prefer not to say'.
- This survey does not request any personally identifiable information such as your name or contact details. We ask that you **do not** include names or any information that could identify yourself or another individual in any free-text or open-ended responses. If such information is inadvertently provided, it will be identified and removed from the dataset prior to analysis and reporting, wherever possible, in line with the anonymisation process outlined in this notice and GDPR.

## Why is this data being collected?

- SYSTRA, SEStran and Stantec will collect your demographic information to:
  - Ensure the survey sample is representative of the population (aged 16+).
  - Understand how responses vary between people with different characteristics.
  - Support impact assessments for the Regional Bus Strategy.
- This activity operates on the following lawful bases:
  - Article 6(1)(a) Consent: Your involvement in the research is entirely voluntary, and we require your consent to participate.
  - Article 6(1)(e) Public Task: results may inform public policy.
  - Article 9(2)(a) Explicit consent (for special category data): you are required to give explicit consent to participate and provide your data for the specified purposes of this research. Explicit consent is obtained at the start of the survey through a clear consent question.

## How will it be used?

- All data held as part of this project will be held in accordance with SEStran, SYSTRA and Stantec's Data Protection Policies, as listed at the end of this notice.
- All data held as part of this project is encrypted with a secure password and access restricted to only those working on the project.

- SEStran, SYSTRA and Stantec comply with their obligations under the GDPR by storing and destroying data securely; not collecting or retaining excessive amounts of data; protecting data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect data.
- The demographic data collected in the surveys will be used to ensure we are collecting a nationally representative sample for this research, and to understand how experiences of transport vary between users with different characteristics.
- The survey data will be collected, stored and processed by SYSTRA for the online survey, with Stantec as sub-processors.
- Surveys completed by phone may also be collected, stored and processed by SEStran and Stantec, with these responses shared with SYSTRA electronically and anonymised, with any original paper copies used in collection destroyed securely once they have been saved in an electronic form on a secure UK or EU based server.
- Anonymised, aggregated data is shared among SYSTRA, SEStran, and Stantec for analysis and reporting.
- There will be no way for SYSTRA, SEStran or Stantec to identify you personally from your survey responses.

### **Who will it be shared with?**

- Your responses to the online surveys will be shared by SYSTRA with SEStran and Stantec. The dataset which is shared by SYSTRA will be anonymised (the dataset received by SEStran and Stantec will not contain any personally identifiable information).
- If responses are collected by phone, these will be shared by SEStran or Stantec with SYSTRA. The dataset which is shared by SEStran or Stantec will be anonymised (the dataset received by SYSTRA will not contain any personally identifiable information).
- No personal identifiers will be used in any reporting.
- All data collection, processing and storage for this project will take place in the UK and EU.

### **How long do we keep your data?**

- The data collected in relation to this project will be deleted no later than 12 months after survey close (by 25<sup>th</sup> August 2026).

### **Your rights and your data**

You have the following rights with respect to your survey response:

- The right to withdraw your agreement to the processing. This applies up until the point of anonymisation upon survey submission.
- The right to lodge a complaint with the Information Commissioners Office.

Because your responses cannot be linked to you after submission (no personal identifiers are collected and results are fully anonymised), the following rights are not applicable after your survey responses have been anonymised upon submission:

- The right to object to the processing of your personal data.
- The right to request a copy of the data which SYSTRA, SEStran or Stantec holds about you.
- The right to request that SYSTRA, SEStran, or Stantec corrects any data if it is found to be inaccurate or out of date.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.

## Contact Details

If you have any questions about this research in general, please contact Rachael Murphy, Strategy Manager at SEStran, by emailing [rachael.murphy@sestran.gov.uk](mailto:rachael.murphy@sestran.gov.uk).

Should you wish to find out more about SYSTRA's data protection processes or contact their Data Protection Officer, please contact SYSTRA's UK Compliance Team at: [UK\\_compliance@systra.com](mailto:UK_compliance@systra.com)

If you have any concerns or questions about data protection or your rights you can also contact the Information Commissioners Office by phone on 0303 123 1113, online at <https://ico.org.uk/global/contact-us/contact-us-public/>, or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## Company Policies

SEStran's data protection policy can be viewed here: <https://sestran.gov.uk/publications/data-protection-policy/>

SYSTRA's data protection policy can be viewed here: [https://www.systra.com/uk/wp-content/uploads/sites/11/2023/06/systra\\_ltd\\_data\\_protection\\_policy\\_gdpr\\_2024.pdf](https://www.systra.com/uk/wp-content/uploads/sites/11/2023/06/systra_ltd_data_protection_policy_gdpr_2024.pdf)

Stantec's privacy policy can be viewed here: <https://www.stantec.com/content/dam/stantec/files/PDFAssets/Policies/privacy-policy-related-practices-procedures-2025.pdf>