

Smartbike Scandinavia Privacy Notice

Who does this Notice apply to?

Clear Channel Sverige and Clear Channel Norway (“**we,**” “**us,**” or “**our**”) take your privacy very seriously and will collect and process your Personal Data in a secure manner. In order to protect your privacy, we act in accordance with EU Data Protection Law, namely the General Data Protection Regulation 2016. Before you agree with this Clear Channel Smartbike Scandinavia Privacy Notice, we recommend you read it carefully. (This Notice applies in addition to the Clear Channel Sverige and Clear Channel Norway websites).

This Clear Channel Smartbike Scandinavia Privacy Notice (“Notice”) applies to you, as a Smart Bike or Bike Scheme User (“User”); it explains to you as the Data Subject what Personal Data we process and how, when and why it is processed. It also explains your rights in relation to the processing of your Personal Data and how you may exercise those rights.

Why is this Notice important?

Clear Channel Sverige and Clear Channel Norway, are the joint Data Controllers and the registered offices are:

Clear Channel Sverige

AB Box 827, 101 36

Stockholm

Org.nr: 556426-2680

Clear Channel Norway AS

Postboks 467 Sentrum, 0105

Oslo

Org.nr. 976 227 891

We have an obligation to explain to you how we process your Personal Data as a Clear Channel Smartbike Scandinavia User.

We operates a Smart Bike service in the cities of Stockholm called Citybikes and Malmö called Malmö By Bike and Drammen called Drammen Bysykler (**“Service”**), in joint partnership/ in conjunction with Malmö kommun and Drammen kommune which enables users to hire a bike through registration on www.malmobybike.se and www.drammenbysykler.no, bike station (Malmö), Pressbyrån (Stockholm), Tourist Information Center (Drammen) (**“the Platforms”**), in accordance with the terms of use

Malmö: <https://www.malmobybike.se/en/info/terms-and-conditions>,

Drammen: <https://www.drammenbysykler.no/en/info/terms-and-conditions>.

In order to make this service possible we need to collect and process your Personal Data.

“Personal Data” means personal information that identifies you as an individual or relates to an identifiable individual as defined under applicable European legislation (and in particular, the European General Data Protection Regulation 2016).

What does this Notice do?

This Notice informs you of our practices from 25 May 2018 with respect to the collection, use and disclosure of Personal Data which you provide to us via our Platforms.

What Personal Data we collect, how and why?

We may use the Clear Channel Smartbike Scandinavia Platforms to collect the following Personal Data and at the specified times and for these reasons:

Personal data	Malmö By Bike	Drammen Bysykler
first and second name when you first register with us to identify you	X	X
Gender when you first register with us for statistical purposes	X	X
Social security number (personnummer) when you first register with us to identify you		
Date of birth when you first register with us for statistical purposes	X	X
Email address when you first register with us, to identify you, verify your order, keep you updated of and provide important communication on the progress of your order and send you information you might be interested in	X	X
Billing and postal address when you first register with us, to identify you, process your order	X	X
Contact number when you first register with us and at any other point of the transaction, to identify you, update you and communicate with you	X	X
Time stamps from calls and bike stations (including date and time) when you contact our customer care team or collect and return a bike, to monitor duration of use, track the security of our bikes and to prevent unauthorised use	X	X

Secure login details if you register to access secure or otherwise restricted parts of our Platforms e.g. to access your customer account, marketing preferences control panel	X	X
Pin code to be able to use service instead of Bike card	X	
Medical information for insurance claims, to help you administer a claim	X	X

- And as provided for in
 - Clear Channel Sverige Privacy Notice <https://clearchannel.se/cookieprivacypolicy/>
 - Clear Channel Norway Privacy Notice <https://clearchannel.no/cookieprivacypolicy/>

In some circumstances, we may request additional Personal Data to help us to provide you with the most appropriate response. If you do not provide the Personal Data where requested, your access to the Service, or our ability to assist you, may be restricted.

Sensitive Personal Data

We will not ask for your Sensitive Personal Data except as part of an insurance claim or in the event we have to report a matter to the legal authorities.

“Sensitive Personal Data” means Personal Data which may relate to: race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life or criminal record. Where you do provide Sensitive Personal Data, we will ask you for explicit consent to Clear Channel to use that information solely in connection with the purpose for which it has been provided.

Why we collect this personal data and on what legal basis?

In addition to the above reasons, we collect this information in order to make all functionalities of the service available to you, namely: to verify and process your order; for invoicing; to keep you posted on the progress of your order; answer your question when you contact us; to assist in retrieving a lost or stolen bike and administer support in an accident or incident. We do this because you have registered to use the service and the legal basis upon which we rely to process this data is to fulfil the obligations of a legal contract, unless stated otherwise.

We may also rely on our legitimate business interests and that of that of the cities of Stockholm, Malmö and Drammen in connection with our agreement with them and use some of the information to personalise our Platforms for you and improve your user experience; adapt and enhance our Platforms; provide customer services, process and administer subject access requests to data and resolve complaints (this may include verifying your personal details or having them verified by a third party if this is necessary in order to deliver personal services); manage bicycle furniture; to provide information about you to our support department and bike recovery team; prevent fraud; communicate with you about delivery times, services and other updates and for statistical purposes where data will be anonymised. We may also process Personal Data from third party applications which are required to make the Service work.

Where we are required to do so by law, in our legitimate interests or where we need to protect your interests or someone else’s interests; we may share your details with local enforcement agencies, including the police.

Direct Marketing and Promotions

To make your experience of using our service useful, we may rely on our legitimate business interest and use your email address to inform you about the development of Platforms, special offers and promotions. We may share your contact details with our partners of the smart bike/ bike scheme upon explicit consent. If you no longer wish to receive this information, you can unsubscribe using the information provided below under **“Opt-Out of Marketing and Promotions”**.

Your Rights

Under the European General Data Protection Regulation 2016, you are entitled to be given a description of all Personal Data we hold about you, and applicable rights may include for example the right to request we amend or delete your Personal Data; the right to withdraw consent; the right to know the purposes for which your Personal Data is being processed and the recipients to whom your Personal Data may be disclosed (subject to legal and regulatory requirements).

If you do not agree to your Personal Data being used in accordance with this Notice please do not submit your Personal Data to us through the Platform or by any other means.

Right to Rectification of Personal Data

We assume responsibility for keeping an accurate record of Personal Data once you have submitted the information, but not for confirming the on-going accuracy of your Personal Data if you do not update us.

If you advise us that your Personal Data is no longer accurate, we will amend or update it (where practical and lawful to do so). You can tell us about any inaccurate data by contacting our customer support team

- Malmö: info@malmobybike.se
- Drammen: info@drammenbysykler.no

Right to Copies of Personal Data and Right to Transfer

Where permitted by law, you may have the right to contact us to request a copy of Personal Data that we hold about you. Before responding to your request we may ask you to (i) verify your identity and (ii) provide further details so we can better respond to your request. You may also request from us to transfer your data to another entity. If you wish to exercise this right, please contact the customer support team

- Malmö: info@malmobybike.se
- Drammen: info@drammenbysykler.no

Right to Erasure or Restriction of Personal Data

You can ask us to delete or restrict your Personal Data in some circumstances such as where we no longer need it or you withdraw your consent (if consent is applicable). If we've shared it with others, where possible, we'll let them know about the erasure.

Right to Withdraw Consent

If, at any time, you have consented to us processing your Personal Data in the circumstances or purposes described above, and you no longer wish to have your Personal Data processed in this way, you may unsubscribe by contacting our dedicated customer support team

- Malmö: info@malmobybike.se
- Drammen: info@drammenbysykler.no

Rights in relation to Automated Decision-making and Profiling

You have the right not to be subject to a decision when it's based on automatic processing or profiling. We only carry out this type of decision-making where the decision is necessary for the entry into or performance of a contract; or authorised by Union or Member state law applicable to us; or based on your explicit consent. We will always tell you if we do any such activity using your Personal Data.

Opt-Out of Marketing and Promotions

You have the right to opt out of receiving direct Marketing and Promotions communications by:

- clicking on the relevant 'unsubscribe' link in the email;
- contacting us at
 - Malmö: info@malmobybike.se
 - Drammen: info@drammenbysykler.no
- letting us know at the time that you provide your Personal Data.

If you withdraw your consent, if you provided it, to receive any further Marketing and Promotions communications from us, we will not contact you further for the purpose of direct marketing. This will not prevent you from using any of our Platforms.

If you have any queries or complaints about how we have handled your Personal Data, please contact our Privacy Office at mydata@clearchannelint.com.

Third Party websites

Where links from our Platforms are provided to non-Clear Channel websites, we are not responsible for those websites and nor do we imply endorsement of the linked websites. These third-party websites will be governed by different terms of use (including privacy notices) and you are solely responsible for viewing and using each such website in accordance with the applicable terms of use. We are not responsible for how your Personal Information is handled by such third-party websites. These websites are not covered by this Notice unless otherwise specified in this Notice.

Security of Personal Data

Your Personal Data (and commercial information) will be kept as confidential and as secure as possible. We employ appropriate technical and organisational measures consistent with our legal obligations and standard industry practice. Further, as required by the European General Data Protection Regulation 2016 we follow strict security procedures in the storage and disclosure of Personal Data which you have given to us, to prevent unauthorised access as far as reasonably possible.

We use industry standard practices to safeguard the confidentiality of your Personal Data, including “firewalls” and Secure Socket Layers. We treat your Personal Data as an asset that must be protected against loss, alteration, destruction and unauthorised access and which our employees and representatives must keep confidential, and we use many different security techniques to protect your Personal Data from unauthorised access by users’ inside and outside of Clear Channel. We also use internal protections to limit access to users’ Personal Data to only those employees or representatives who need the Personal Data to perform a specific function. It is impossible to guarantee security, but we commit to taking appropriate action in the event of a breach.

We will inform you, as long as it is reasonable to do so, if your Personal Data has been breached.

Transfer of Personal Data

Third Parties

Other than to third party Data Processors governed by a data processing agreement which replicates the terms of this Notice, and as provided for in this Notice, where it is necessary to involve a third party service provider for the performance of our contractual obligations or by operation of law, we will not transfer identifiable, non-aggregated Personal Data to third parties.

We may receive and send information about you, including your Personal Data, if you use any of our Platforms to our partners or sub-contractors (Data Processors) in technical, payment, identity verification and delivery services, analytics providers or credit reference agencies;

We only share your Personal Data with third parties in the following cases:

- Where it is necessary to involve a third party service provider, for the performance of our contract with you in order to provide the Service (e.g. a payment processor when we charge you fees in relation to the Service);
- On the grounds of our legitimate business interests, namely:
 - As part of the booking process, we may use multiple IT applications to provide the Service to you.
 - With a service provider engaged in maintenance of our platforms;
 - We may use analytics and search engine providers to assist us in the improvement and optimisation of our Platforms.
- We may also disclose your information if required to do so by law or in a good faith belief that such access, preservation or disclosure is reasonably necessary to (i) respond to claims asserted against us (ii) to comply with legal proceedings, (iii) to enforce any agreement with our users such as our Terms and Conditions and our Privacy Notice, (iv) in the event of an emergency involving the danger of public health, death or physical injury to a person (v) in the framework of investigation or (vi)

to protect the rights, property or personal safety of [insert Clear Channel business name] employees and representatives.

If you require further information on our Third Party processors you can contact us at mydata@clearchannelint.com

Data Controller Intragroup Transfer

Clear Channel Sverige and Clear Channel Norway sits amongst a group of businesses which are governed by a lead entity, Clear Channel International Limited, registered address, 33 Golden Square, London W1F 9JT. The parent company of Clear Channel International is Clear Channel Outdoor Holdings, a US publically listed company. From time to time, it may be necessary to transfer Personal Data collected by Clear Channel Sverige and Clear Channel Norway to the lead entity and its US parent company together with their data processors, in our legitimate interests.

Transfers outside the European Union

Non-European countries may have data protection laws that are less protective than the legislation where you live. Where this is the case (such as the United States), our transfers of data will be regulated by standard contractual clauses relating to the transfer of Personal Data outside of the European Union (or outside of jurisdictions deemed “adequate” for data privacy by the European Union). We will not transfer your data outside of the European Union for any other reason than described in this Notice, unless we are required to do so by operation of law.

Sale or Merger

If Clear Channel Sverige or Clear Channel Norway or its assets are sold to or merge with another entity you should expect that some or all of the Personal Data collected by us may be transferred to the buyer/surviving company. If so, we will seek to obligate the acquiring company to use any Personal Data transferred in a manner consistent with applicable legislation and this Notice, but cannot guarantee that it will be able to impose that requirement or that the acquiring company will comply.

Retention of Personal Data

If you have provided us with Personal Data, your Personal Data will be retained for the duration of your subscription with our service, the length of time required by applicable legislation, or otherwise a reasonable period of time (and we or our third party data processors will amend or delete your Personal Data when no longer required).

Cookies

What Cookies we use, why we use them, and how they impact you?

A cookie is a small text file, typically of letters and numbers (with an ID tag), which may be placed on your computer or mobile when you access our Platforms. Cookies generally allow a website or a Smart Application to recognise your device and browsing activity if you return to it, or if you visit another website which recognises the same cookies.

Different cookies perform different functions. Some help you navigate through pages, “storing preferences” information and generally making the website easier to use. Others identify products, goods or services you may be interested in and are used to provide you with tailored advertising

When you visit our Platforms we use the following cookies:

Persistent cookies allow our website to recognise you when you return to our site another time.

This provides us with useful analytics that help us optimise our website and your visits.

Session cookies exist just for the life of your current visit whilst you have your browser open. They are not stored on your hard disk and are erased when you exit your web browser.

You can configure your browser settings so that you do not receive any cookies the next time you use our service. To find out more about these functions, you can consult your browser instructions or the help function of your browser.

Cookie Name	Purpose	Expiry	Malmö by Bike	Drammen Bysyklar
{variable} i.e SSESS1f7c 45 59d63e1bf1 f 629f0d12af b 05fa	This cookie detects the user's session when the url is loaded. This cookie is set only for authenticated web users. This cookie is used by Drupal core	23 days	X	X
has_js	This variable is used to detect if the user can use js. It is used by Drupal core and it applies to every user.	User session	X	X
malmobybike_cookie_bar	This cookie remembers the user has accepted the cookie policy. If it is accepted then the cookie bar for cookie acceptance is not loaded anymore. In the other case, the cookie bar will be shown next time the user visits the site after 1h	user session/8 years when user accepts	X	X
	Registers whether or not the user has activated JavaScript in their browser.	User session	X	X

Social buttons

On some of our Platforms you will see ‘social buttons’. These allow you to share or bookmark pages on our site.

Social media sites such as Google, Facebook, and LinkedIn may collect information about your internet activity. They may record if you visit our Platforms and the specific pages you are on if you are logged into their services, even if you don’t click on the button.

You should check the privacy and cookies policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.

Further information

1. [Facebook cookies](#)
2. [Google cookies](#)
3. [LinkedIn cookies](#)

Manually managing cookies

There are a number of ways you can manually manage cookies on your computer/device. Read more on the [About Cookies website](#).

If you access the Internet from more than one computer/device, it is important to ensure each browser is configured to suit your cookie preferences.

Do Not Track

If you wish to block all cookies all the time you can set your browser to do this. It is important to note that blocking cookies may result in some parts of our site not working properly. This may affect your browsing experience.

How does Clear Channel ask for Cookies consent?

Clear Channel comply with applicable legislation on cookies. A popup box will appear when you first access our Platform. This asks you whether you consent to cookies. If you do not consent to cookies, they will be disabled on your behalf. You are also free to disable cookies at any time through your browser’s settings (for more information on how to do this please see “how to delete cookies” tab at www.allaboutcookies.org/cookies

If you prefer, you can Opt Out of our cookie processes here

- Malmö By Bike <https://www.malmobybike.se/sv/cookies-policy>
- Drammen Bysykler <https://www.drammenbysykler.no/nb/cookies-policy>

If you choose to disable cookies, please be aware that some parts of our Platforms may not work properly and it is likely that your Platform usage won’t be counted and measured as described above, so we won’t be able to take your actions into account when analysing data or when seeking to improve our service based on that analysis.

Contact us

Should you wish to make any comments, complaints, enquiries or if you have any questions

relating to this Notice, your rights, the Platform, our Marketing and Promotion materials or Services we provide, you may contact the Clear Channel Chief Data Privacy Officer by emailing or writing to the Privacy Office:

The Chief Data Privacy
Officer Privacy Office
Clear Channel
International 33 Golden
Square
London,
UK W1F
9JT
Email: mydata@clearchannelint.com

You may also contact the local Data Protection Authority The Swedish Data Protection Authority or The Norwegian Data Protection Authority. Clear Channel Sverige and Clear Channel Norway governing Data Protection Authority is the [UK Information Commissioner's Office](#) you may contact them [here](#).

Changes to this Notice

This Notice is subject to periodic review to ensure it is in line with applicable legislation.

We retain all applicable ownership rights to information we collect. We reserve the right to change, modify, add or remove provisions of this Notice. Any changes to this Notice will be posted here, and we encourage you to check back from time to time.

Applicable Law

This Notice is governed and construed in accordance with English law.