

**Privacy Policy for Protection of Personally Identifiable Information  
Compass Card**

The Compass Card is a Smart Card used by transit passengers to obtain regional transportation services. When a transit passenger uses a Compass Card, certain forms of Personally Identifiable Information may be collected. This Privacy Policy describes what types of Personally Identifiable Information are collected and how San Diego Metropolitan Transit System (“MTS”) manages and stores Personally Identifiable Information to ensure your privacy.

**1. Personally Identifiable Information - What Types are Collected**

Personally Identifiable Information means any information that identifies or describes a person, including but not limited to, travel pattern data, address, telephone number, email address or credit card number.

For un-registered Compass Cards, the only Personally Identifiable Information collected is boarding information, which includes the bus route or trolley boarded, which trolley station or bus stop you boarded at and the time at which you boarded a bus or trolley.

For registered Compass Cards, MTS does request that certain Personally Identifiable Information be provided to set up your account. Collection of Personally Identifiable Information occurs when you provide your account information through either the Webtix Web site (<http://compass.511sd.com/>), the Compass Card Service Center or Compass Call Center.

The following is a description of what Personally Identifiable Information is collected:

<b><u>Personally Identifiable Information Collected</u></b>	<b><u>Type of Subscriber Personally Identifiable Information Collected From</u></b>
First and Last Name	<i>All</i> Subscribers of Registered Compass Cards
Mailing Address	<i>All</i> Subscribers of Registered Compass Cards <i>except for</i> <u>Employer Passes</u>
Email Address	<i>All</i> Subscribers of Registered Compass Cards <i>except for</i> <u>Employer Passes</u>
All Boarding Transactions: which bus route or trolley boarded, the trolley station or bus stop you boarded at, and the time at which you boarded	<i>All</i> Subscribers of Registered and Un-Registered Compass Cards
Login Name and Password	<i>Only</i> Subscribers of Registered Compass Cards that have <u>Automatic Billing</u>
Response to Security Question (i.e. who is your childhood friend?)	<i>Only</i> Subscribers of Registered Compass Cards that have <u>Automatic Billing</u>
Credit or Debit Card Number, Type and Expiration Date	<i>Only</i> Subscribers of Registered Compass Cards that have <u>Automatic Billing</u>
Billing Address if different than Mailing Address	<i>Only</i> Subscribers of Registered Compass Cards that have <u>Automatic Billing</u>
Date of Birth	<i>Only some</i> Subscribers of Registered Compass Cards that have <u>Senior, Disabled or Medicare Discount</u>
School Attending	<i>Only some</i> Subscribers of Registered Compass Cards that have <u>Youth Discount</u>
Workplace	<i>Only</i> Subscribers of Registered Compass Cards for <u>Employer Passes</u>

## 2. Use of Information

MTS uses Personally Identifiable Information to more efficiently administer your registered Compass Card account functions, such as providing automatic billing. MTS also collects Aggregated Travel Information through your use of the Compass Card. Aggregated Travel Information includes sale transactions, boarding information and information on the type of subscriber, such as a rider using a senior, disabled or Medicare discount pass. MTS uses this information in a format that does not identify any individual Compass Card subscriber. Personally Identifiable Information such as your name, address and billing information is removed before it is used for Aggregated Travel Information. MTS does share Aggregated Travel Information with San Diego Association of Governments (“SANDAG”) and North County Transit District (“NCTD”) for data analysis purposes.

MTS will not use your Personally Identifiable Information collected from registered Compass Cards to send you emails or mail marketing advertisements for any other MTS service or product. However, MTS reserves the right to continue to email or mail important notices concerning use of your registered Compass Card and this Privacy Policy.

## 3. Third Party Access to Personally Identifiable Information

MTS only provides access of Personally Identifiable Information to the below described parties and entities:

- i. MTS Internal Departments: Access to Personally Identifiable Information is limited only to certain approved personnel and only for certain approved purposes necessary to administer your account. MTS controls access by providing only certain employees with the necessary log in credentials. The Compass Card Customer Service Center, the Compass Card Call Center, operations staff and MTS management have access to your Personally Identifiable Information as required to perform account functions and to investigate customer complaints. In addition, MTS Code Compliance Security Officers also has access but it is restricted to only a subscriber’s name, date of birth, recent sale transactions and recent boarding information to investigate transit fare violations.
- ii. EdenRed: EdenRed is a third party firm that assists some San Diego businesses with obtaining Compass Cards for its employees. EdenRed collects and provides certain Personally Identifiable Information to MTS regarding the employees who are provided Compass Cards through their program. This includes only a person’s name and email if provided. To learn more about how EdenRed protects Personally Identifiable Information, visit EdenRed’s Web site at [www.edenredusa.com](http://www.edenredusa.com).
- iii. Law Enforcement Purposes: Per state law, MTS must make Personally Identifiable Information available to a law enforcement agency pursuant to a search warrant or to a Peace Officer without a search warrant if there is good cause to believe the delay of obtaining a search warrant would cause an adverse result in an investigation.

## 4. Personally Identifiable Information – Where it is Stored

Safeguarding and protection of Personally Identifiable Information is a high priority for MTS. Each physical Compass Card includes an embedded computer chip and a serial number. The embedded computer chip stores transit passes and cash value. The only Personally Identifiable Information stored on the actual Compass Card is recent transaction data, limited to the last 10 boarding transactions. If a Compass Card is stolen or misplaced, please notify Compass Card Customer Service immediately. Your Compass Card will be turned off promptly and replaced.

MTS maintains the collected Personally Identifiable Information on a database within our central computer servers. MTS also maintains group lists provided from Employer and School programs of its Compass Card participants, limited to the participant’s name and the associated Compass Card serial number. Access to the Compass Card database and

Compass Card group lists are restricted to authorized MTS personnel (see Section 3 (i) above). Access to the computer servers are restricted to only authorized technical personnel.

#### 5. **Storage Period**

State law requires that MTS only store Personally Identifiable Information from a registered Compass Card with credit card information to the extent it is necessary to perform account functions such as billing, account settlement or enforcement activities. All other stored Personally Identifiable Information that is not necessary to perform account functions, such as a credit card number that has expired, will be discarded within 4 years and 6 months from the date of expiration. In addition, any personal account information connected to an expired Compass Card will be discarded within 4 years and 6 months from the date the Compass Card has expired.

#### 6. **Cookies**

Cookies are small data elements that a Web site can use to facilitate the user's ongoing access, such as by remembering names and passwords until the session has ended. Cookies may be saved by your internet browser when you use the Webtix Web site. You may be able to set parameters on your computer that allow you to accept cookies or to have your browser notify you each time a cookie is offered. You may also set your internet browser to reject cookies. MTS does not collect or retain your Personally Identifiable Information through the use of cookies.

#### 7. **Security**

MTS uses secure sockets layers (SSL) encryption to protect the transmission of credit card information you submit online through the Webtix Web site. MTS also monitors network traffic to identify unauthorized attempts to upload, change or otherwise cause damage to the Webtix Web site.

Please do not send highly sensitive information, such as a credit card number, over email. MTS cannot guarantee that incoming email before received by MTS will not be intercepted. Instead, contact us by mail or telephone when submitting highly sensitive information.

Despite the protections established within this Privacy Policy, if any unauthorized access to or use of Personally Identifiable Information occurs, MTS will notify you of a breach in security of the system following discovery in one or more of the following ways: email, mail, posting of the breach on Webtix or by notifying the media.

#### 8. **Changes to a registered Compass Card Account**

You may review and request changes to your Personally Identifiable Information through either the Webtix Web site or calling the Compass Card Customer Service Center.

#### 9. **Children's Privacy Policy**

The Children's Online Privacy Protection Act ("COPPA") prohibits the online collection of Personally Identifiable Information from children under the age of 13. In accordance with COPPA, Youth Compass Cards are not available for purchase through the Webtix Web site.

If MTS has actual knowledge that we have collected Personally Identifiable Information online from children, MTS will make all reasonable efforts to obtain parental or legal guardian consent before any further use of the Personally Identifiable Information occurs. When MTS does not obtain parental or legal guardian consent to use Personally Identifiable Information for a child, MTS will no longer maintain the Personally Identifiable Information in any retrievable form.

**10. Effective Date**

The Effective Date of this Privacy Policy is December 5, 2014.

**11. Changes to Privacy Policy**

MTS will endeavor to make all appropriate revisions to this Privacy Policy as changes to MTS’s collection and management of Personally Identifiable Information occur. When material changes occur to the Privacy Policy, MTS will notify you in one or more of the following ways: updating the Privacy Policy posted on Webtix Web site; sending rider alerts on Twitter or Facebook; posting fliers on buses and trolleys; posting fliers on information boards at Trolley Stations; and/or posting fliers at the main lobby of MTS Offices.

**12. History of Changes to Privacy Policy**

<u>Date</u>	<u>Activity</u>
December 5, 2014	MTS establishes Privacy Policy for Compass Cards.
July 1, 2013	MTS assumes responsibility of the administration of the San Diego Regional Compass Card program from SANDAG. SANDAG’s Privacy Policy is in effect until MTS establishes its own Privacy Policy for Compass Cards.