

# Keolis Amey Docklands 2025 Limited

## Website Privacy Notice

Last Updated: 15 December 2025

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### 1. Introduction

Keolis Amey Docklands 2025 Limited (“KAD”, “we”, “our”) is committed to protecting the privacy and security of the personal data we collect about users of our services (“you/your”).

The purpose of this privacy notice is to explain what personal data we collect about you when you interact with us, whether as a passenger on the network, when visiting our facilities, or when interacting with any of our staff members, such as our Passenger Service Agents. When we do this, we are the controller. We run a franchise for the operation and maintenance of the Docklands Light Railway (“DLR”). As such, the personal data we handle will often be seen by Transport for London (“TfL”) and/or Docklands Light Railway Ltd, who are an independent controller of your personal data.

We act as a processor in relation to personal data collected for payments, journey details and Oyster card refunds. In these instances, the TfL and/or Docklands Light Railway Ltd are the controller for your data. Please read their privacy notices to understand how your data is processed.

We are a limited company registered in England and Wales under registration number 15618008 and we have our registered office 41 Lothbury, London, EC2R 7HF.

We are registered with the UK supervisory authority, the Information Commissioner’s Office (“ICO”) in relation to our processing of Personal Data under registration number ZB836631.

Please read this privacy notice carefully, as it provides important information about how we handle your personal information and your rights. If you have any questions about any aspect of this privacy

notice you can contact us using the information provided below, or by emailing us at [dataprotection@keolisameydlr.co.uk](mailto:dataprotection@keolisameydlr.co.uk).

## **2. What is personal data?**

'Personal data' is any information from which you can be identified, either directly or indirectly. For example, your name or an online identifier.

'Special category personal data' is more sensitive personal data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone's sex life or sexual orientation.

## **3. Personal data we collect about you, our purposes and lawful bases**

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data Use and Access Act 2025. We are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to goods and services we use to operate and maintain the DLR. The personal data we collect differs depending upon your interaction with us, please see the table below to learn more about the personal data we collect, the purposes for doing so and the lawful bases we do this under.

Generally, we process your personal data to comply with applicable law, regulations, guidelines, contractual clauses and instructions (including but not limited to instructions issued by TfL and the British Transport Police, Fire Authorities etc) for the purposes of the safe management and operation of the DLR.

Where personal data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

Please view our separate notices for more information on the following:

- Job vacancies – for more information on how we process your personal data as part of an application please see our job applicant privacy notice.
- We use cookies to monitor the use of our website, for more information on the cookies we use please see our cookies notice.

Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis
Passengers on the DLR	<p>CCTV recordings monitoring the trains and platforms of the DLR.</p> <p>CCTV recordings includes both fixed security surveillance cameras and body worn cameras.</p> <p>Body worn cameras, once activated, will capture both video and audio.</p>	For crime prevention and public safety.	<p>It is in our legitimate interests to operate CCTV surveillance and keep a record of incidents to ensure:</p> <ul style="list-style-type: none"> <li>- the safety of our staff and other passengers,</li> <li>- that we fully comply with health and safety regulations, and</li> <li>- that we can assist with the investigation of crime.</li> </ul> <p>Where special category data is processed, we will rely upon our legal obligation under the Health &amp; Safety at Work Act 1974 and the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.</p> <p>In certain situations, we may also process your personal data under the lawful basis of protecting your vital interests.</p>
	Penalty fare data (name, contact details, postcode, journey details)	To process penalty fare data	We process this data under the lawful basis of performance of a contract, specifically the TfL's conditions of carriage and the contract between us and DLRL.
Participants in an initiative (Access DLR)	Name, email address, telephone number, photos, disability information and any other information you voluntarily provide to KAD when making the booking	For you to be able to use the Access DLR travel assistance	Explicit consent

Visitors to our facilities (depots)	Name, contact details, reason for visit.  Vehicle registration details to facilitate access.	To ensure safety  Where you require loading/unloading access we require your vehicle registration to facilitate this.	Where we process your vehicle registration to collect or drop-off deliveries, we process this for the performance of a contract.
Suppliers  <i>And other parties we contract the services of</i>	In order to contract with you we may process the following categories of personal data: Name (of yourself, company etc.) phone number, email address, bank details, ID or other documents required to contract with you.	We process this information in order to enter into a contract with you.	This information is processed under the lawful basis of performance of a contract.
Website visitor & general interactions with us	General enquiries - name email phone and other details contained within your enquiry.  Domain name and IP address, operating system, browser, version and the name of the website that you visited prior to our website (for	We process your data to respond to your queries.  We collect information on our website for the purposes of monitoring and improvement.	It is in our legitimate interests to respond to your enquiry.  We have a legitimate interest to improve the functionality, security and performance of our website. Collecting this information will allow us to provide you with a more customised user experience.

	example if you came to us through a search engine).		
Newsletter subscribers	Your name, email address and postcode.	To keep you informed of our events, community activities and offers.	Consent
	Name, relevant event attended, email address, phone number	To keep you informed of our events, community activities and offers.	(Third party) consent
Charitable giving, sponsorship events	Business information, contact details, photo permission form if relevant	To promote KAD	Legitimate interests to promote KAD and to the community Consent

## **4. How we collect your personal data**

We collect most of this personal data directly from you—in person, by telephone, text, or email and/or via our website. However, we may also collect information from TfL, DLR and our suppliers in relation to the services we provide to you.

Sometimes we also collect information about you through third parties, for example, when you attend one of our sponsorship or charity events.

## **5. Sharing your personal data**

We may also disclose your personal data to third parties. These include:

- TfL, DLRL
- The suppliers that we work with, including Access DLR

We may also share your data with the other KAD group companies.

It is important for us that you understand who your information may be shared with and the seriousness with which we take the confidentiality of your personal data. If you have questions about who we share your personal data with, we will be happy to tell you more. Other than as set out above, and save insofar as is necessary in order for us to carry out our obligations arising from any contracts entered into between you and us, we will not share your data with third parties unless we have procured your consent to do so.

## **6. International Transfers**

When we collect your personal data, it may be processed outside the UK. This is because the organisations we use to provide our services to you are located in other countries.

We have taken appropriate steps to ensure that where personal data processed outside the UK, it has an essentially equivalent level of protection as it has within the UK. We do this by ensuring that:

- Your personal data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation); or
- We enter into either International Data Transfer Agreements (IDTAs) or Standard Contractual Clauses (SCCs) (with the UK Addendum) with the receiving organisations and ensure that supplementary measures are also applied, where necessary.

## 7. How long we keep your personal data

We will retain your personal data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your personal data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning.

## 8. Your rights

You have certain rights in relation to the processing of your personal data, including to:

- **Request access** to your personal data (commonly known as a “Data Subject Access Request”). This enables you to receive a copy of the personal data we hold about you, please see below for more information regarding subject access requests.
- **Request rectification** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. If you object to us using your personal data for marketing purposes we will stop sending you marketing material.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party (data portability).
- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.

Right to withdraw consent

In the circumstances where you may have provided your consent to the processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we are permitted by law to do so.

#### How to exercise your rights

You will not usually need to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. If you wish to exercise your rights, please contact us at [dataprotection@keolisameydlr.co.uk](mailto:dataprotection@keolisameydlr.co.uk).

#### Subject access requests (“DSARs”)

Please note that our handling of DSARs is in conjunction with TfL, this means that DSARs are typically directed to TfL via their [Access your data](#) page.

## **9. How to complain**

You have the right to lodge a complaint with the supervisory authority, if you believe we are infringing the UK data protection laws or you are concerned about the way in which we are handling your personal data. The supervisory authority in the UK is the Information Commissioner’s Office who can be contacted online at:

- [Contact us | ICO](#)
- Or by telephone on 0303 123 1113

## **10. How to contact us**

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, then please address your correspondence to:

Alternatively, you can email us at [dataprotection@keolisameydlr.co.uk](mailto:dataprotection@keolisameydlr.co.uk)