

City of Winchester
Winchester Transit and WinReady On Demand Privacy Policy

Updated: 3/09/2024

Information Collection

The City of Winchester (City), through Winchester Transit, gathers various information about users of the WinReady On Demand program, including but not limited to through the mobile and online trip scheduling applications (applications). This information includes:

- (a) Personal information about you, provided through voluntary registration;
- (b) Personal information regarding your use of WinReady On Demand, including but not limited to times and locations of trips booked, taken, or cancelled, and saved locations;
- (c) Personal information, provided to us by you through any other method (including without limitation correspondence and discussions); and
- (d) Eligibility information for specialized transit services.

The personal information collected will be held by us or on our behalf or by such other agent as we may appoint from time to time. Via Transportation Inc., the City's third-party contractor, will have access to all personal information collected by WinReady On Demand for purposes related to management and administration of WinReady On Demand.

IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY, INCLUDING ANY AMENDMENTS, OR THE COLLECTION OF YOUR PERSONAL INFORMATION, THEN DO NOT INSTALL OR USE THE APPLICATION.

Location Information

WinReady On Demand will collect geo-location information, including your trips' origin and destination, and will access and use the precise geo-location of your devices running the applications. This location information is used to facilitate trip planning and trip updates. The applications will only access and use your device's location information if you give the application permission through your device settings or the application itself.

Payment Information (Effective July 1, 2024)

When you book a trip, WinReady On Demand will collect information about the method of payment you intend to use. The City's payment processing vendor (payment processor) collects payments through the application from credit cards and other contactless payment methods. The City does not collect your debit or credit card details; this information is managed by the City's payment processor and is subject to their own privacy policies and procedures, as well as any applicable privacy laws, independent of the City. The payment processor may impose an additional transaction fee based on your transaction associated with the City.

Purposes of Information Collected

The personal information you provide will be used for the following purposes:

- (a) To allow you to use WinReady On Demand;
- (b) To provide you with further information about WinReady On Demand or other services, rewards, and/or promotions offered by us or which we consider may be of interest to you;
- (c) To verify your identity and assist in technical, administrative and/or service inquiries (e.g. password reset, pre-paid payments);
- (d) To investigate any complaints relating to misuse of WinReady On Demand or misconduct in relation to WinReady On Demand and to take any action deemed necessary to protect your safety and the safety of others in relation to those complaints;
- (e) To assist in making accommodations for specialized transit services;
- (f) To analyze in aggregate form (identifiable characteristics removed so that you will remain anonymous) for the purposes of continuous service improvement; and
- (g) To disclosure as may be required under applicable law, including but not limited to the Freedom of Information Act (FOIA), as amended or replaced from time to time.

Disclosure of Information

You agree that we may disclose the following:

- (a) Your personal information to the police or other government authorities where we believe it is reasonably necessary to protect your safety or the safety of others with whom you have been travelling while using WinReady On Demand;
- (b) Your personal information to third parties when we believe, in good faith, that we are required to do so by law; and
- (c) Aggregate information and other information that does not personally identify you to such third parties as we may see fit.

Protection of Privacy Statement

With the exception of disclosures listed in the subsection (a)-(c) above, we will not sell, lease, share or disclose personal information to private business, organizations or individuals unless required or permitted to do so by applicable law.

Notice of Information Collection

Personal information is being collected for the purposes set out in this policy. Questions about this information collection should be forwarded to the Public Services Director, City of Winchester at 301 E. Cork Street, Winchester, VA 22601, or by calling 540-773-1340.

Consequences of Non-Provision of Information

Failure to provide necessary personal information requested at the time of registration for use of WinReady On Demand may result in certain services not being available to you.

Security

We are committed to your privacy and strive to protect the personal and confidential information of those who use WinReady On Demand. However, as no data transmission over the internet can be guaranteed to be completely secure, we cannot ensure or warrant the security of any information you transmit or receive your personal information through WinReady On Demand. These activities are conducted at your own risk, and it is your responsibility to ensure you safeguard your devices appropriately and do not share your login or password.

Retention of Your Information

If you want us to permanently delete your personal information, you must delete your account on the application. So long as your account remains active, we will preserve your personal information. We will retain any and all personal information that we are required to retain under any applicable laws. We may also retain any anonymized and de-identified information and continue to use this information in accordance with this Privacy Policy. WinReady On Demand is not responsible for any information backed-up or stored on your devices following the de-activation of your account.

Changes to this Privacy Policy

If we decide to make material changes to this Privacy Policy, we will notify you and other users by placing a notice on the City of Winchester website. You should periodically check the website for updates. By using WinReady On Demand after we have so posted notice of such modifications, alterations, or updates, you agree to be bound by such revised terms.