

19 April 2023

File Ref: OIAPR-1274023063-1041

[REDACTED]

Tēnā koe [REDACTED]

Request for information 2023-061

I refer to your request for information dated 21 March 2023, which was received by Greater Wellington Regional Council (Greater Wellington) on 21 March 2023. You have requested the following:

“Please tell me what happens to the individual data collected by snapper card use and checking by the conductor on the Wairarapa train line.”

Greater Wellington emailed to request further clarity on your request on 31 March 2023. Your follow up email on 3 April 2023 provided further detail on the request:

“I would like to know what personal information (name, credit card, address etc) is collected or recorded in the way of association of my snapper details with each trip.

Or put another way what data does snapper collect and hold on me associated with my travel using snapper?

So for instance can you or snapper collate data for me or about me in terms if trips I make, frequency, dates, location etc?

Does snapper collect and hold data about my trips and travel using snapper in an identifiable way?

So if I ask under the OIA and Privacy Act what data snapper or Metlink or any other organisation with access to snapper holds on my trips using snapper? Would there be any?

And yes I mean what data is collected (both personal and non identifying) is collected and held by the conductors device and by snapper when the card is scanned.”

Greater Wellington's response follows:

The data collected from Snapper ticketing includes details of the Snapper card transaction for each tag on and tag off of a trip made by the card holder. This information is held by Snapper and may include the Snapper card number, the tag on and tag off stops or stations, number of zones travelled through where applicable, the date and time of tag on and tag off, the bus or train service and vehicle information, the train line or bus route, direction of the trip, the operator of the train or bus service, the fare or ticket type used to pay for the trip, the fare amount paid including any concession or default fare where applicable, number of passengers for group travel, and some other technical (non-personal) information.

Some information may not be identifiable from the data if the transaction has a missing tag off, specifically on rail where the tag off information is required to identify the rail line or direction of the service.

The information held by Snapper may include some further personal details of the registered card holders who have a personal account with Snapper. Any personal information held by Snapper is subject to Snapper's privacy policy and privacy statement at the following links: <https://www.snapper.co.nz/privacy-policy/> and <https://services.snapper.co.nz/privacy-statement>.

Metlink receives the transaction-level Snapper information as raw data and holds it in processed formats in its secure data repositories. Specified authorised officers within Greater Wellington Regional Council do have access to the card numbers and card transaction details under strict confidentiality and probity requirements. Under the Greater Wellington Regional Council's current service agreement with Snapper, the information that Greater Wellington Regional Council receives from Snapper transactions does not include the personal information supplied by card holder in relation to registered card such as the card holders name, address or credit card or payment information.

The data is used at an aggregate level (e.g. sum of trips made by passenger type, time of day, date, by station or stops, routes or services etc.) and for financial reconciliation of fare revenue with Snapper. The data is necessary for various planning, decision making, service and network design and day to day operations and performance monitoring purposes. Any Personal Information held by Metlink or its contractors is protected under standard privacy and security protocols and subject to the Metlink privacy policy at the following link:

<https://www.metlink.org.nz/about/legal/privacy-statement/>.

By using Metlink services and the payment media offered by Metlink or its ticketing suppliers (currently Snapper), passengers agree to, and are bound by, the conditions set out in the Metlink Conditions of Carriage (<https://www.metlink.org.nz/about/legal/conditions-of-carriage/>) and privacy policy.

Metlink does not release to any third party any Personal Information collected from Snapper ticketing or any data that could be used to identify the person holding the Snapper card or their travel pattern. Any aggregate data or information released to a third party by Metlink or Greater Wellington Regional Council is in accordance with the provisions set under the Privacy Act 2020 and Local Government Official Information and Meetings Act 1987.

If you have any concerns with the decision(s) referred to in this letter, you have the right to request an investigation and review by the Ombudsman under section 27(3) of the Local Government Official Information and Meetings Act 1987.

Please note that it is our policy to proactively release our responses to official information requests where possible. Our response to your request will be published shortly on Greater Wellington's website with your personal information removed.

Nāku iti noa, nā



Tim Shackleton

Kaiwhakahaere Matua Waka-ā-atea | Acting General Manager Metlink