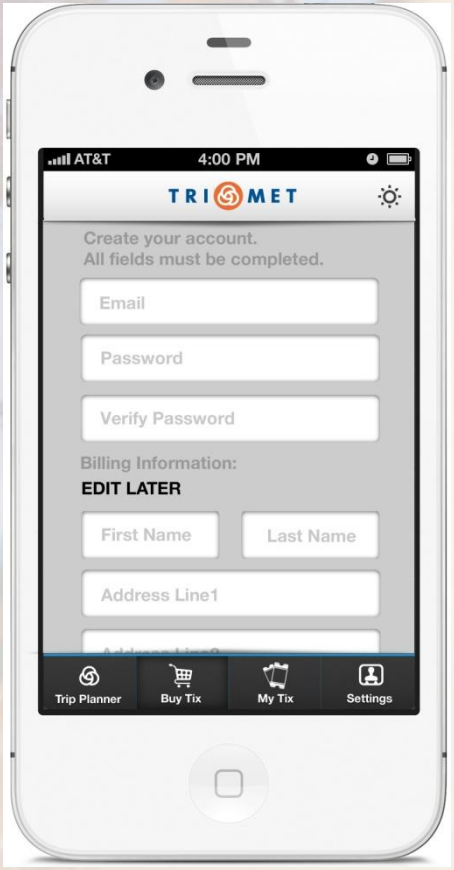
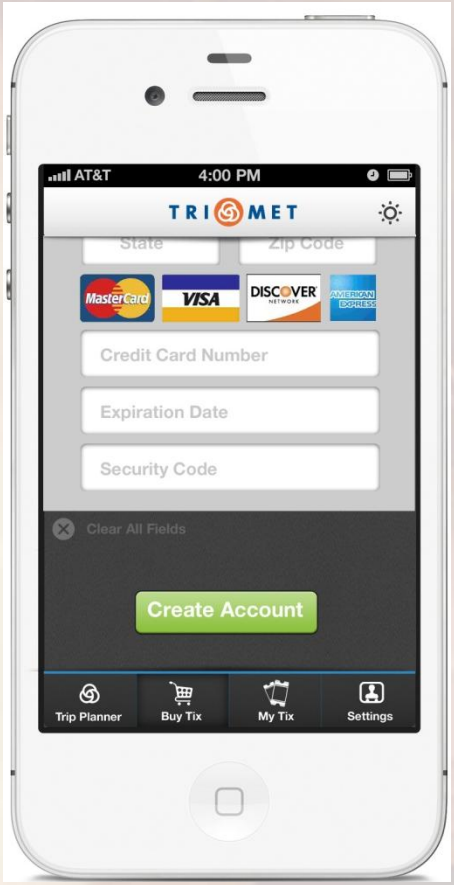
# Mobile Ticketing: Issues That Should Be On Your Radar Screen

Liz Goebel
Senior Deputy General Counsel
TriMet

# Register


AT&T
4:00 PM
TRIMET
Create your account.
All fields must be completed.
Email
Password
Verify Password
Billing Information:
EDIT LATER
First Name
Last Name
Address Line1
Trip Planner
Buy Tix
My Tix
Settings


AT&T
4:00 PM
TRIMET
State
Zip Code
MasterCard
VISA
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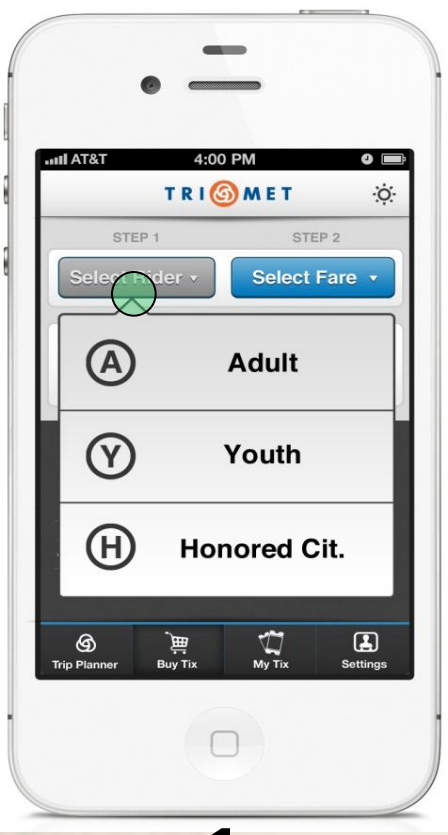
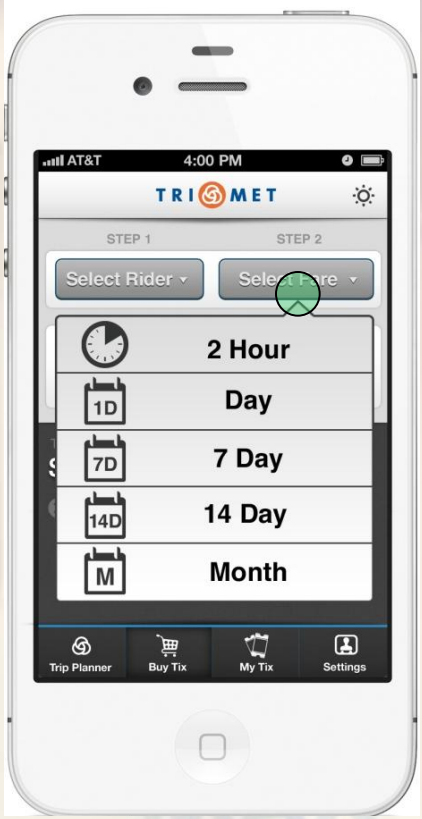
AMERICAN EXPRESS
Credit Card Number
Expiration Date
Security Code
Clear All Fields
Create Account
Trip Planner
Buy Tix
My Tix
Settings

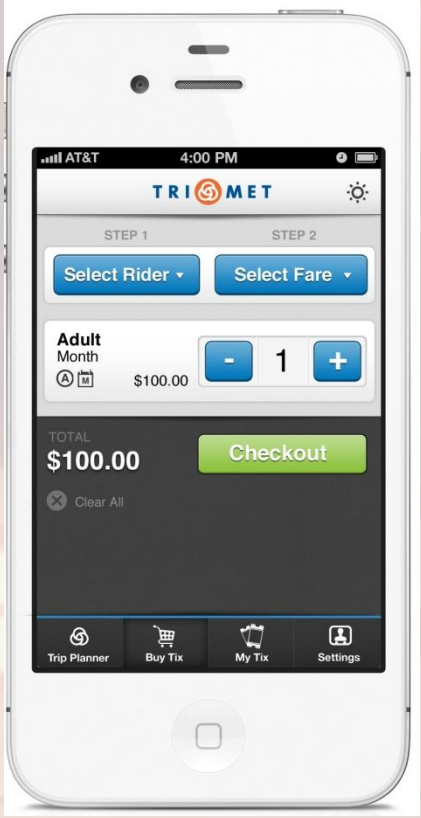
# Buy a ticket




**1**
**Select Rider**




**2**
**Select Fare**




**3**
**Checkout**

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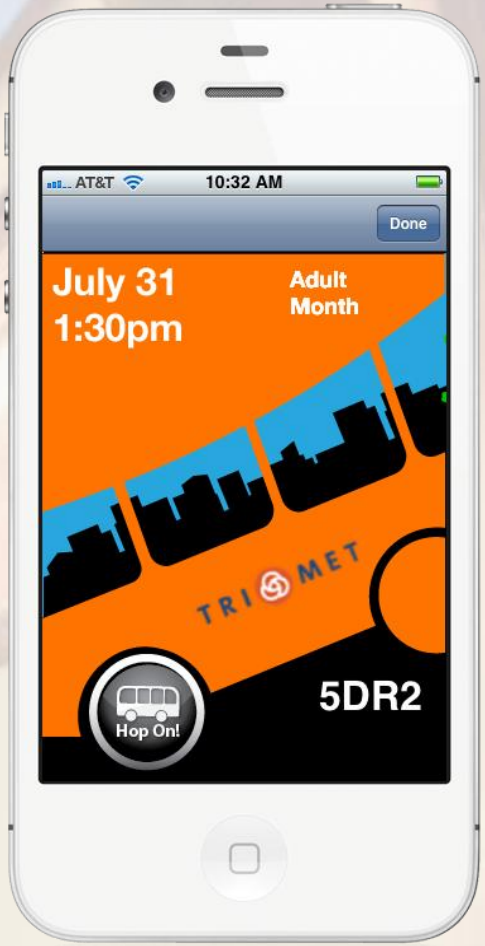
# Use a ticket



# User Data- Types

- Name
- Address
- Email Address
- Device Information (phone number, device type/model number)
- Fare product purchased (rider type and ticket type)
- GPS data – location of purchases, location of ticket launch (if device GPS is enabled)
- Bankcard Information

# User Data - Public Records

- Data a public record?
- State law definitions
- “ . . . information relating to conduct of public business . .. owned, used or retained by a public body . . . “
- Privacy concerns – Geo location data
- Exemptions?

# Ga. Code Ann. § 50-18-72(a)(30)

"Records of the Metropolitan Atlanta Rapid Transit Authority or of any other transit system that is connected to that system's TransCard, SmartCard, or successor or similar system which would reveal the financial records or travel history of any individual who is a purchaser of a TransCard, SmartCard, or successor or similar fare medium. Such financial records shall include, but not be limited to, social security number, home address, home telephone number, e-mail address, credit or debit card information, and bank account information but shall not include the user's name . . ."

# Utah bill (S.B. 12) would exempt transit user data from disclosure subject to limited exemptions for private records

"(3)(a) . . . the following personal information received by the district from a customer through any debit, credit, or electronic fare payment process is a private record . ..

(i) travel data, including

(A) the identity of the purchasing individual or entity;

(B) travel dates, times, or frequency of use; and

(C) locations of use;

(ii)service type or vehicle identification used by the customer;

(iii) the unique transit pass identifier assigned to the customer; or

(iv) customer account information including the cardholder's name, the credit or debit card number, the card issuer identification or any other related information. . ."

# User Data - Retention

- How long retained?
- Privacy/safeguarding
- State laws

# User Data – Safeguarding

- Oregon Identity Theft Act
  - Public and private entities
  - PI -Consumer's first name or first initial and last name with:
    - Financial account number, credit or debit card number, combined with password or access code
    - Any above data elements when not combined with name when data is not rendered unusable by encryption, redaction and info sufficient to commit identity theft
  - Safeguarding – own, maintain or possess PI
    - Develop, implement and maintain reasonable safeguards to protect PI, including disposal
  - Demonstrating Compliance
    - Select vendors capable of maintaining appropriate safeguards and require by contract
  - Breach/notification –
    - Owns, maintains or possesses PI used in the person's business when breach of computerized data is discovered, unless law enforcement determines no harm
    - Applies to computerized info
    - Penalties –restitution; civil fines $1,000 -$500,000

# User Data – Safeguarding

## PCI DSS (Payment Card Industry Data Security Standards)

Set of requirements designed to ensure that all companies that process, store or transmit credit card information maintain a secure environment (firewalls, encryption of data across open transmission, restrictions on access to data, establishment of secure systems, and security systems testing, etc).

# Privacy Policy

- Children's Online Privacy Protection Act of 1998(COPPA) 15 USC 6501-6508; FTC "The Children's Online Privacy Rule, 16 CFR Part 312; amended:
  - Parental control over collected PI
    - First and last name; Home or physical address; email; phone number; SSN; other identifying information that can permit contact with child
  - Commercial websites directed to children under 13 that collect, use or disclose PI from children under 13
  - General audience websites or online services that have actual knowledge they are collecting, using or disclosing PI from children under 13
  - Clear and conspicuous privacy policy describing information practices for PI
  - Notice to parents and verifiable consent before collecting PI from children under 13
- FTC Rule Amendments (effective July 1, 2013) add geolocation information to PI, photos, videos and audio files with voice or image, persistent identifiers such as IP addresses and hardware IDs

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# Privacy Policy

## FTC Advisory Report (February 1, 2013) "*Mobile Privacy Disclosures, Building Trust Through Transparency*"

- Notify consumers of privacy practices
- Mobile App Developers
  - Privacy policy, easily accessible through app stores
  - Just in time disclosure, affirmative express consent before collecting and sharing sensitive information
  - Coordination with ad networks and other third parties that provide services for apps, to provide accurate disclosures to consumers
  - Participate in self-regulatory programs, trade associations and industry organizations, which can provide guidance on how to make uniform, short-form privacy disclosures

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# FTC Guidelines August 2012 "*Marketing Your Mobile App*"

- Basic privacy principles
- Clear and conspicuous privacy disclosure

# Intellectual Property

- Ownership/licensing rights
- Co-Branding: Use of trademarks and logos
- Source Code Escrow; release source code upon triggering events
- Disaster recovery

# Public Funds

- Third party collections
- Deposit requirements


Bell 3G
4:20 PM
TRIMET
Done
Expires
12:33P Mar 33 2013
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A
Adult 2-Hour
WW

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