DELAWARE COUNTY TRANSIT BOARD

POLICY

Policy Name	Resolution Number	Origin Date	Revision
Privacy And Information Management	26-06-07	June 17, 2026	

NOTE: The Delaware County Transit Board ("DCTB ") is the governing body of Delaware County 's Public Transit System established by the Delaware County Commissioners under the authority of Ohio Revised Code sections 306.01 and 306.02. Delaware County Transit ("DCT") is the common name given to the public transit system. This policy is established and set forth under the authority of the DCTB. DCT and DCTB may be used interchangeably in this policy or used separately to distinguish responsibilities.

PURPOSE

The purpose of this policy is to establish guidelines for the collection, use, protection, retention, and disclosure of personal information obtained by Delaware County Transit (DCT) through its transportation services, employment practices, communications systems, telephone interactions, and website operations. DCT is committed to safeguarding personal information, maintaining public trust, protecting confidentiality where required by law, and ensuring compliance with applicable federal, state, and local laws and regulations.

SCOPE

This policy applies to all Delaware County Transit Board (DCTB) employees, authorized representatives, riders, applicants, website visitors, and third-party service providers who may have access to DCT information or systems. It governs all methods used to collect, store, access, transmit, maintain, and dispose of personal information in connection with DCT operations.

DISTRIBUTION

This policy shall be distributed to all DCT management, administrative, operational, and support personnel and shall be made available to the public through appropriate channels.

POLICY STATEMENT

A. Website Visitors

When you visit the Site, certain information is collected automatically through our hosting provider's standard server logs, including your IP address, browser type and version, operating system, referring website, the pages you visit, and the date and time of your visit. This information is used for website administration, security monitoring, performance, and troubleshooting. In addition:

- Google Analytics 4. We use Google Analytics 4 to understand, in aggregate, how visitors use the Site — such as which pages are visited and from what general geographic region. Google Analytics 4 does not log or store individual IP addresses. Google's privacy policy is available at https://policies.google.com/privacy.
- Security monitoring. The Site's security tools log IP addresses and request data in order to detect and block malicious activity such as automated attacks and spam.

- Google reCAPTCHA. Forms on the Site are protected by Google reCAPTCHA, which collects hardware and software information from your device to distinguish human visitors from bots. Use of reCAPTCHA is subject to the Google Privacy Policy (https://policies.google.com/privacy) and Terms of Service (https://policies.google.com/terms).
- Embedded videos. Some pages include embedded YouTube videos. Embedded content behaves as if you had visited the third party's own website and may set cookies and collect data in accordance with Google's privacy policy.

B. Civil Rights and Disability-Related Information

Information submitted through the Title VI Complaint, ADA Complaint, and Request for Reasonable Modification forms is collected solely to receive, evaluate, and resolve complaints and requests as required under federal law, including Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act, and applicable Federal Transit Administration requirements. This information is not used for any other purpose. It is shared only with personnel and entities involved in processing the complaint or request, or as otherwise required by law, and is retained in accordance with applicable federal recordkeeping requirements.

C. Rider Information and Transportation Services

Delaware County Transit collects personal information from riders and prospective riders as necessary to provide safe, efficient, and accessible transportation services. Information collected may include names, addresses, telephone numbers, email addresses, emergency contact information, mobility or accessibility needs, trip details, eligibility documentation, and service usage information. This information is used to schedule and coordinate transportation services, determine eligibility for specialized programs, provide service updates and notifications, address customer concerns, maintain service records, improve operational efficiency, and comply with applicable federal and state regulations.

Rider information is accessible only to authorized personnel and approved service providers who require access to perform their duties. DCT makes reasonable efforts to protect rider information from unauthorized access, disclosure, alteration, or destruction.

D. Employee Information

Delaware County Transit collects and maintains employee information necessary for employment administration, payroll processing, benefits administration, scheduling, workforce management, training, certification tracking, safety compliance, and operational management. Employee information may include personal identification information, contact information, tax and payroll records, benefits enrollment information, emergency contact information, training records, certifications, licensing documentation, performance records, and other employment-related information.

Employee information is maintained in secure systems and is accessible only to authorized personnel with a legitimate business need. DCT uses employee information solely for

employment-related purposes, compliance with legal and regulatory requirements, and the efficient administration of agency operations.

E. Telephone Communications and Internal Operations

DCT may collect information through telephone communications and internal operational processes in addition to information collected through its website and electronic systems. Information provided during calls may be collected to schedule transportation services, respond to inquiries, provide customer support, ensure passenger safety, and support agency operations.

To ensure quality service, enhance employee training, document interactions, investigate incidents, and support compliance requirements, telephone calls may be monitored or recorded in accordance with applicable laws. DCT may also maintain internal records such as dispatch logs, call records, trip manifests, service notes, incident reports, maintenance records, employee training records, and compliance documentation. These records are maintained in accordance with applicable records retention schedules and legal requirements.

F. SMS/Text Messaging Communications (A2P Compliance)

DCT uses SMS/text messaging to provide operational and service-related communications to employees and, where applicable, riders. These messages may include service alerts, severe weather notifications, scheduling updates, dispatch communications, and internal employee notifications. DCT does not send marketing or promotional text messages.

By providing your mobile phone number and affirmatively opting in, you consent to receive SMS messages from DCT. The following terms apply:

- Message frequency varies based on operational needs.
- Message and data rates may apply.
- You may opt out of SMS communications at any time by replying STOP to any message. After sending STOP, you will receive one final message confirming your opt-out.
- For assistance, reply HELP to any message or contact DCT directly.
- Consent to receive SMS messages is not a condition of receiving services or employment.
- Message delivery may be delayed or prevented by factors beyond our control; carriers are not liable for delayed or undelivered messages.

No mobile information will be shared with or sold to third parties or affiliates for marketing or promotional purposes. Phone numbers and SMS-related data are used solely for official DCT communications and are shared only with authorized service providers operating on DCT's behalf, as necessary to deliver messages, under confidentiality and data protection requirements.

G. Information Sharing and Disclosure

DCT may share personal information with authorized employees, contracted service providers, government agencies, regulatory authorities, law enforcement agencies, and other entities when necessary to provide services, conduct official business, comply with legal obligations, protect public safety, or fulfill contractual requirements. DCT does not sell personal information for commercial purposes.

As a public agency, DCT is subject to Ohio Public Records Law and other applicable laws governing public access to government records. Information maintained by DCT may be disclosed when required by law, court order, subpoena, public records request, or other authorized legal process. Information exempt from disclosure by law will be protected accordingly.

H. Cookies

The Site uses cookies — small files placed on your device — that are necessary for the Site to function, along with cookies associated with the analytics, security, and embedded content described above. You can set your browser to refuse all cookies or to indicate when a cookie is being sent; some features of the Site may not function properly without them.

I. Information Security

DCT employs administrative, technical, and physical safeguards designed to protect personal information from unauthorized access, use, disclosure, modification, or destruction. These safeguards may include access controls, password protection, encryption technologies, secure data transmission methods, system monitoring, employee training, and vendor security requirements. Access to sensitive information is restricted to authorized personnel who require access to perform their official duties. However, no method of transmission over the Internet or method of electronic storage is completely secure, and we cannot guarantee absolute security.

J. External Links

The DCT website may contain links to external websites operated by third parties. These links are provided solely for the convenience of users and do not constitute endorsement by DCT. Once a user leaves the DCT website, this policy no longer applies, and the user becomes subject to the privacy practices and policies of the external website.

K. Disclaimer and Information Accuracy

Delaware County Transit strives to ensure that information provided through its website, publications, communications, and services is accurate and current. However, DCT does not guarantee that all information is free from errors, omissions, interruptions, or technical inaccuracies. DCT reserves the right to update, modify, or remove information at any time without notice and shall not be liable for damages resulting from reliance upon information provided through its systems, except as otherwise required by law.