

# **RIBBLE STEAM RAILWAY LIMITED**

**Company No. 01112880**

**Registered Charity No. 1163073**

## **General Data Processing Regulation (GDPR)**

### **Privacy Policy**

**Author:**

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**Date: 19<sup>th</sup> May 2018**

**Michael Bailey**  
Ribble Steam Railway

**Approved: Board of Trustees 14<sup>th</sup> May 2018**

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## **Introduction**

This privacy policy has been prepared in light of the implementation of the General Data Processing Regulation which is effective from 25th May 2018. It supersedes any previous privacy policies and notices published by Ribble Steam Rly Ltd. This policy sets out how the Company protects and handles the personal information of its members, supporters and visitors to its website.

The body of this policy below is published on the Company's website; [www.ribbonsteam.org.uk](http://www.ribbonsteam.org.uk) .

## **RIBBLE STEAM RAILWAY LIMITED PRIVACY POLICY**

### **Scope of Use**

Ribble Steam Railway Ltd is committed to protecting and respecting your privacy.

This Policy explains when and why the Company collects personal information about its members, supporters and also visitors to its website, how it is used, the conditions under which it may be disclosed to others and how it is kept secure.

The Company may change this Policy from time to time so please check this page occasionally to ensure that you are happy with any changes. Changes will also be notified to members through 'The Ribble Pilot' journal.

Any questions regarding this Policy and privacy practices should be forwarded to the RSR Data Protection Officer by email to; [enquiries@ribbonsteam.co.uk](mailto:enquiries@ribbonsteam.co.uk) or by writing to Ribble Steam Railway, Chain Caul Road, Preston, PR2 2PD.

### **Ribble Steam Railway Ltd**

Ribble Steam Railway Ltd is a heritage railway preservation organisation which works to conserve and protect historic railway locomotives, rolling stock and other exhibits, for the benefit of the public. It is based at the Ribble Steam Railway at Preston in Lancashire where accommodation, which is shared with the Furness Railway Trust, is used to house, restore and maintain the Railway's locomotives and other vehicles.

Ribble Steam Railway Limited is a company limited by guarantee number 01112880 and a registered charity (No. 507266). The registered Company address is: 3 Lincoln Drive, Liverpool, L10 3LJ.

### **How does the Company collect information from you?**

The Company holds the personal information that you provide as a member and also

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for non-members if you contact the Company, for example, about sales or to make a donation. When you visit the Company's website, some information is also recorded.

### **What type of information is collected from you?**

When you become a member of the Company, the personal information that is collected can include your name, address, email address and telephone contact number(s). If you are not a member of the Company and you make a donation or purchase an item from the shop by post, your payment and delivery address is retained following the completion of the transaction in line with normal accounting practices and will not be used for any other purpose.

### **How is your information used?**

The Company may use your information to:

- administer your membership including the Gift Aid of monies paid by you if you elect to do this;
- process a donation that you have made;
- process shop orders that you have submitted;
- carry out obligations arising from any contracts entered into by you and the Company;
- deal with entries into a competition;
- seek your views or comments on the Company's projects and activities;
- notify you of changes to the Company's activities;
- send you communications which you have requested and that may be of interest to you. These may include the Company journal 'The Ribble Pilot' and information about appeals, other fundraising activities or to process a grant or job application.

### **Other Information held on volunteers & paid staff**

The Company will through its management of the Safety Management System retains records of competencies in roles both train crew and other activities. In addition where a role requires a medical questionnaire to be completed and/or a medical examination to take place to ensure a person is medically fit for that role those records will be retained throughout the period of the person participating in that role.

The Company reviews its retention periods for personal information periodically. The Company is legally required to hold some types of information to fulfil its statutory obligations (for example the collection of Gift Aid). It will retain your personal information on its systems for six years to allow these obligations to be met after which time the personal information will be erased and any paper records containing personal information for the same period will also be destroyed.

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## **Who has access to your information?**

The Company will not sell or rent your information to third parties.

The Company will not share your information with third parties for marketing purposes.

Please be reassured that the Company will not release your information to third parties beyond the Company for them to use for their own direct marketing purposes, unless you have requested the Company to do so, or if it is required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Ribble Steam Railway Limited does not currently use any form of online donation.

The Trust may transfer your personal information to a third party if it is under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply its terms of use or to protect the rights, property or safety of its members and supporters. However, steps will be taken with the aim of ensuring that your privacy rights continue to be protected.

## **Your choices**

When you apply for membership of the Company, you have a choice about what information you wish to receive from the Company. If you do not want to receive communications about the Company's work on its projects and activities, then you can select your choices by ticking the relevant boxes situated on the membership form from which your information is collected. However this will mean that the Trust will be unable to provide you with the information given to members to keep you up to date with progress on its projects and activities.

You have the right to restrict or object to the Company using your personal information.

You have the right to ask the Company to delete your personal information. This will mean, however, that it will be unable to administer your membership or to keep you informed about its projects and activities.

You have the right to ask for a copy of the information that Ribble Steam Rly Ltd holds about you or to ask the Company where possible to share a digital copy of your information directly with you or another organisation. When you contact the Company to ask about your information you may be asked to identify yourself - this is to help the Company to protect your information. You will not be charged when

you contact the Trust to ask about your information. To do this, please contact the RSR Data Protection Officer by email at: [enquiries@ribblesteam.co.uk](mailto:enquiries@ribblesteam.co.uk) or by post to Ribble Steam Rly, Chain Caul Road, Preston, PR2 2PD.

### **How you can access and update your information**

The accuracy of your information is important to the Company; if you change your address, or if any of the other information that is held by the Company is inaccurate or out of date, please email the following address : [enquiries@ribblesteam.co.uk](mailto:enquiries@ribblesteam.co.uk) or write to Ribble Steam Railway, Chain Caul Road, Preston, PR 2PD

Security precautions are in place to protect the loss, misuse or alteration of your information

When you give the Company personal information, steps are taken to ensure that it is treated securely. The Company does not use or hold any sensitive information, such as credit or debit card details.

Non-sensitive details (e.g. your email address etc.) may transmitted over the Internet, and this can never be guaranteed to be 100% secure. As a result, whilst the Company strives to protect your personal information, it cannot guarantee the security of any information you transmit, and you do so at your own risk. Once your information has been received, the Company will use its best efforts to ensure its security in its records.

### **Profiling**

The Company does not profile its members and supporters.

### **Website Usage Recording and the Use of 'cookies'**

The Company website makes use of the devices known as “cookies” to assist in ensuring it works efficiently. The operation of these devices is in accordance with the requirements of the statutory provisions of the relevant Regulations.

Your usage of the Company’s website is captured by the logging of your IP address and session details, the number of pages you view and the type of browser you use. This is automatically logged by the Trust's server sponsor for system administration and to help improve the Company’s website usability; it is stored and used for aggregated and statistical reporting.

### **Links to other websites**

The Company's website may contain links to other websites run by other organisations. This privacy policy applies only to the Company's website, so you are encouraged to read the privacy statements on the other websites that you visit. The Company cannot be responsible for the privacy policies and practices of other sites even if you access them using links from the Company's website. In addition, if you follow or use a link to the Trust's website from a third party site, the Company cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommends that you check the policy of that third party site.

### **Young People aged 16 or Under**

The Company is concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide the Company with personal information, for example when applying for junior membership of the Company. Parents/guardians of children are asked to review and co-sign the membership application giving consent to the Trust to hold the young person's personal data.

### **Transferring your information outside of Europe**

As part of the operation of the website, information which you may provide to the Company may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of the servers hosting the Trust's data are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you are agreeing to this transfer, storing or processing. If the Company transfers your information outside of the EU in this way, it will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use the Company website or contact it by email while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

### **Review of this Policy**

The Company keeps this Policy under regular review and may change it from time to time as it thinks necessary or as may be required by law. Any changes will be immediately posted on the website and you will be deemed to have accepted the

terms of the Privacy Policy on your first use of the Trust's website following the alterations.

This Policy was initially issued on 19<sup>th</sup> May 2018.



# GDPR – Existing Held Data

## Introduction

This document lays out the information covered by GDPR which is already held by RSR, who has access to this information, and the current method of storage.

## Held Data

Data	Persons with Access	Storage Location
Membership Records	<ul style="list-style-type: none"><li>• Membership Secretary</li><li>• FOH Manager</li><li>• FOH Assistant</li><li>• IT Manager</li><li>• Company Secretary</li></ul>	Digital records held on secure file server (Located in locked server room)  Paper records currently held at membership secretary's house
Operational Competency Records & Medical Questionnaires & Certificates	<ul style="list-style-type: none"><li>• Operations Director</li><li>• Heads of relevant department</li></ul>	All operational competency and medical records are held in locked cabinets, located within a locked room

Volunteer Records	<ul style="list-style-type: none"> <li>• FOH Manager</li> <li>• FOH Assistant</li> <li>• Head of relevant department</li> </ul>	Filing cabinet within a locked office.
Volunteer & Staff Contact Information	<ul style="list-style-type: none"> <li>• Organisation Wide (Where digitally held)</li> <li>• FOH Manager</li> <li>• FOH Assistant</li> <li>• Head of relevant department</li> </ul>	<p>Digital records kept on Heritage Operations Processing System accessible only to authorised persons with a login.</p> <p>Paper records are kept in a filing cabinet within a locked office.</p>
Volunteer Roster Information	<ul style="list-style-type: none"> <li>• Organisation Wide</li> </ul>	Digital records kept on Heritage Operations Processing System

		accessible only to authorised persons with a login.
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<p>Staff Roster Information</p>	<ul style="list-style-type: none"> <li>• Head of relevant department</li> <li>• Staff within the department</li> </ul>	<p>Digital records kept on Google Mail for Business accessible only to authorised persons with a login.</p> <p>Paper records kept within a locked building.</p>
<p>Customer Information</p>	<ul style="list-style-type: none"> <li>• FOH Manager</li> <li>• FOH Assistant</li> <li>• Heads of relevant department</li> </ul>	<p>Digital records are held on servers operated by Wilson Digital Media.</p> <p>Email addresses and other</p>

		contact information is held digitally on Mailchimp for use as external marketing tool.
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## Transferred Data

Data	Organisation Transferred To	Reason for Transfer
Membership Records allowing routing of postal mail to members	LAT Creative	LAT Creative are our external printing company, this information is sent to them to allow them to package and distribute printed material to our members.

