

SCARBOROUGH NORTH BAY RAILWAY PRIVACY POLICY

Purpose of policy:

We are committed to protecting your personal information and being transparent about what information we hold about you.

The purpose of this policy is to give you a clear explanation about how we collect and use the information collected from you directly and from third parties.

We use your information in accordance with all applicable laws concerning the protection of personal information.

This policy explains:

- What information we may collect about you
- How we may use that information
- Our use of cookies to improve your use of our website
- Information about how we keep your personal information secure
- How long we retain it for
- Your rights to be able to access it

If you have any queries about this policy, please contact the Data Protection Officer at Scarborough North Bay Railway or email us at info@snbr.org.uk.

Who we are:

We are Scarborough North Bay Railway, which includes the following companies – North Bay Railway Company Ltd, Northstead Manor Ltd, Northstead Manor Gardens Leisure Ltd and Boatman's Tavern Ltd. We Our address is Scarborough North Bay Railway, Station Building, Burniston Road, Scarborough YO12 6PF.

Information collection:

We collect various types of information and in a number of ways:

1. **Information you give us.** For example, when you register on our website, buy tickets, Season Passes or attend our events. We will store personal information you give us such as your name, email address and postal address. We will also store a record of your purchases.
2. **Information from third parties.** We occasionally receive information about you from third parties. For example, we may use third party companies to sell discounted tickets or for you to book tickets for our events.
3. **Sensitive personal data.** Data Protection law recognises that certain categories of personal information are more sensitive such as health information, race, religious beliefs and political opinions. We do not usually collect this type of information about our patrons unless there is a clear reason for doing so.
4. **Any other sensitive personal data** will only be collected anonymously for statistical reporting only.

Legal Basis;

There are three occasions when we may process your data:

1. **Contract purposes.** When you make a purchase from us, you are entering into a contract with us. In order to perform this contract, we need to process and store your data. For the cancellation of an event, booking, or in the case of problems with your payment.
2. **Legitimate business interests.** In certain situations, we collect and process your personal data for purposes that are in our legitimate organisational interests. However, we only do this if there is no overriding prejudice to you by using your personal information in this way.
3. **Marketing communications.** We aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. To do this we use data that we have stored about you, such as what events you have booked for in the past, as well as any preferences you may have told us about.

We use our legitimate organisational interest as the legal basis for communications by post and email. In the case of postal mailings, you may object to receiving these at any time using the contact details at the end of this policy. In the case of email, we will give you an opportunity to opt out of receiving them during your first purchase with us. If you do not opt out, we will provide you with an option to unsubscribe in every email that we subsequently send you, or you can alternatively use the contact details at the end of this policy.

We may also contact you about our work by telephone, however we will always get explicit consent from you before doing this. Please bear in mind that this does not apply to telephone calls that we may need to make to you related to your purchases (as above).

Other processing activities:

In addition to marketing communications, we also process personal information in the following ways that are within our legitimate organisational interests.

1. We may analyse data we hold about you to ensure that the content and timing of communications that we send you are as relevant to you as possible.
2. We may analyse data we hold about you in order to identify and prevent fraud.

In all of the above cases we will always keep your rights and interests at the forefront to ensure they are not overridden by your own interests or fundamental rights and freedoms. You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy. Please bear in mind that if you object this may affect our ability to carry out the tasks above that are for your benefit.

Third parties:

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

1. To the subsidiaries described above when it is necessary for them to be able to provide you with products or services that you've requested.

2. To our own service providers who process data on our behalf and on our instructions (for example our ticketing system software provider). In these cases we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data.
3. To approved audience development organisations to analyse anonymous data to provide marketing insights to inform our business decisions. In these cases we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data.

CCTV:

Scarborough North Bay Railway operates a CCTV system for the purposes of public safety and crime prevention. For further information **contact the Administration Manager.**

Cookies:

Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to allow a website to function (for example to keep track of your basket) as well as to provide website operators with information on how the site is being used.

Your debit and credit card information:

If you use your credit or debit card to purchase from us, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS).

Maintaining your personal information:

We store your personal information indefinitely such that for any subsequent purchases you make we are able to link them back to a single unique record that we hold for you on our system.

If there are aspects of your record that are inaccurate or that you would like to be removed, you can use the contact details at the end of this policy.

Any objections you make to any processing of your data will be stored against your record on our system, so that we can comply with your requests.

Security of your personal information:

We will put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same.

Your rights to your personal information:

You have a right to request a copy of the personal information that we hold about you and to have any inaccuracies in this data corrected. Please use the contact details at the end of this policy if you would like to exercise this right.

Contact details and further information:

Please get in touch with us if you have any questions about any aspect of this privacy policy and in particular, if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

If you have any concerns regarding our handling of your data, or if you wish to find out any further information on the law regarding data protection you can contact the Information Commissioner's Office (ICO) on 0303 123 1113.

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