

# **Rail Innovation Group - Data Protection Policy**

# Updated 10th February 2025

The Rail Innovation Group ("RIG", "we", "us" or "our") is the data controller and is committed to protecting your personal data.

## Age verification:

Our services are not directed to children under the age of 13. By using our services and/or submitting your personal information you declare yourself to be an adult according to applicable legislation. Minors may use our websites and services only with the assistance of a parent or guardian.

# Legal bases for processing your personal data

We will not collect or process your personal data if we do not have a proper 'legal / basis or bases' (lawful justification) for that processing purpose. We typically rely on the following legal bases, as specified for the purposes of processing below:

- "*Performance of a contract*' (UK GDPR Article 6(1)(b))- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request.
- 'Legitimate interests' (UK GDPR Article 6(1)(f))- our processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms; and, we always seek to maintain a balance between our legitimate interests and your privacy.
- *'Legal obligation'* (UK GDPR Article 6(1)(c))- our processing is necessary to comply with our legal or regulatory obligations; or
- *'Consent'* (Article 6(1)(a))- we have obtained your prior permission / consent.

## What information do we collect about you and how do we use it?

When you make an enquiry; or request information; or are requesting our services or a media interview; or you contact us for another reason for which you require a response; or are responding to a contact or communication from us, we collect and process information necessary for responding to you, assisting you and working with you; such as, but not limited to, your first name and surname; company or organisation name; job title; email address, telephone number and the enquiry. This is permissible under the 'performance of a contract' and 'legitimate interests' legal bases.

Our newsletter and direct emails are the primary channel for communicating membership benefits, making subscription mandatory for all members. To administer your subscription, we collect and process necessary information, such as, your names and email address. Our lawful bases for this processing are 'performance of a contract' and 'legitimate interests'. When you choose to opt-into our newsletter mailing list, for the receipt of news and event information fom us, we collect and process the names and email address you provide, and you receive our emails. Our lawful basis for this processing of your data for this purpose is 'consent'. You can use the link we provide in each communication or contact us as described below to opt-out of our marketing mailing list at any time and we will remove you as soon as we can, and within the one month mandated by the UK GDPR (Article 12(3)).

When you register to attend one of our events, we collect and process the names and email addresses you provide to administer the event, provide pre-event information, and, where necessary, we will provide your first name and surname to venue hosts to facilitate building security. We will also add your name and email to our newsletter which includes details of similar upcoming events. Our lawful basis for this processing of your data for this purpose is 'performance of a contract' and 'legitimate interests'. You can use the link we provide in each communication or contact us as described below to opt-out of our marketing mailing list at any time and we will remove you as soon as we can, and within the one month mandated by the UK GDPR (Article 12(3)).

When you join as a member, we will collect your name and email address so that we may invoice you for membership. Our lawful basis for this processing of your data for this purpose is 'performance of a contract'.

## How to access your personal data:

If you would like to know what personal information we hold about you, why we are holding it, who it could be disclosed to or would like a copy of the data, please contact us using the contact details as shown below. Please mark as 'Subject Access Request'. We will respond to your request without delay and within the one month mandated by the UK GDPR (Article 12(3)).

## How do we protect your information?

When you submit our Contact Us form, our Membership Request form, or email us we use secure server software (SSL) which encrypts all information you input before it is sent to us. Furthermore, all of the personal data we collect is stored securely using suitable physical, electronic and managerial procedures, security measures and appropriate safeguards to prevent its unauthorised access, use or disclosure. We keep and use your personal information only for as long as is necessary for the stated purposes and we delete it when those purposes no longer apply.

## What about "cookies"?

"Cookies" are small text files containing a random and unique identifier that are stored by your browser on your computer's hard drive. We use essential cookies on this website collecting your IP address for this purpose. These essential cookies enable core functionality such as page navigation and site performance, security, verification of identity and network management and they cannot be disabled. Our lawful bases for this processing of your data are 'contract fulfilment' and 'legitimate interests'.

We would like to use the following cookies, but only if you give us your permission to do so by consenting. They are all disabled as the default. To consent click 'Accept '. Otherwise you can reject them by keeping them disabled (click 'Reject').

- *Marketing Cookies* These cookies are used to track advertising effectiveness to provide a more relevant service and deliver better ads to suit your interests.
- *Functional Cookies* These cookies collect data to remember choices users make to improve and give a more personalised experience.

• *Analytics Cookies* - These cookies help us to understand how visitors interact with our website, discover errors and provide a better overall analytics.

# Automated decision-making and profiling:

We do not use your data for automated decision-making, profiling or other purposes.

### Disclosures of your personal data:

We do not share or disclose your personal data with any third-parties other than those appointed as 'data processors' to assist us with providing our service (for instance, event management platforms, CRM service providers (including Mailchimp and Eventbrite) and payment transactions providers). All our data processors and their servers are located in the UK or in third countries deemed 'adequate' by the UK, based on the EU GDPR framework, or where a valid international data transfer mechanism is in place.

#### International data transfers:

Your personal data is processed at our operating premises in the UK and in any other places where our data processors are located. This may involve international data transfers depending on your location. The legal basis of data transfers to a country outside the UK is standard contractual clauses and the appropriate security measures are taken by us and the data processors to safeguard your data.

#### Changes to the use of your personal data:

We only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please contact us for an explanation of how the processing for the new purpose is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### Changes to our privacy notice:

We keep our privacy notice under regular review to ensure that it meets legal requirements and industry standards. We may update it occasionally, with changes posted on this website. The revised notice will be effective from the publication date.

#### Your duty to inform us of changes:

It is important that the personal data we hold about you is accurate and current. Please contact us to keep us informed if your personal data changes during your relationship with us.

#### **Third-party links**:

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

#### Your rights:

You may exercise certain rights regarding your data that we process. You have the right to do the following:

- Withdraw your consent at any time where you have previously given your consent to the processing of your personal data.
- Object to processing of your data if the processing is carried out on a legal basis other than consent and / or the performance of a contract with you (i.e. a sale).
- Access your data you can learn if your data is being processed by us, obtain disclosure regarding certain aspects of the processing and obtain a copy of the data undergoing processing.
- Verify and seek rectification you can ask that inaccurate data to be updated or corrected.
- Restrict the processing of your data under certain circumstances, you can restrict the processing of your data. In this case, we will not process your data for any purpose other than storing it.
- Have your personal data deleted or otherwise removed under certain circumstances, you can request the erasure of your data by us.
- Receive your data and have it transferred to another controller in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that we have processed your data by automated means and that the processing is based on your consent, on a contract which you are part of or on pre-contractual obligations (i.e. a sale).
- Lodge a complaint you can bring a claim before your data protection authority, the UK's Information Commissioner's Office.

#### How to exercise these rights:

To exercise these rights or for any questions, please contact us as shown below. We aim to respond to all legitimate requests promptly, and certainly within the one month **mandated by the** UK GDPR (Article 12(3)). We may need to request specific information from you to help us confirm your identity as a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

#### Contact us:

For any questions or concerns about our data privacy practices or this notice, or to exercise your data privacy rights, please email <u>info@railinnovationgroup.com</u>