

Yorkshire Wolds Railway

Data Protection Policy & Procedures (Privacy notice) under GDPR 2018.

Introduction

Malton Dodger Ltd t/a “Yorkshire Wolds Railway” (YWR) retains & uses certain data for several purposes including memberships, volunteers’ health & safety and supplier information etc.

Under the General Data Protection Regulations 2018 (GDPR) individuals have increased rights regarding their personal data and users have to ensure that it can justify the keeping of such data & to be accountable for it. GDPR only applies to individuals’ data.

Policy

YWR is a Data Controller and Data Processor of that data. Data is collected & used only when necessary to support an individual’s connection with the YWR.

There are three processing activities involving such data;

1. Membership
2. Volunteers
3. 3rd parties (people with no ongoing relationship with YWR such as visitors and service providers)

In each case, the YWR determines that the reason for using such data is allowed by GDPR and also ensures that its use of the data is within the regulations insofar as accountability and security is concerned.

The YWR is a member of the Heritage Railway Association (HRA) and this policy should be read in conjunction with their information paper IP43 – January 2018. The data processing in each of the above activities has been audited in line with the HRA’s “Suggested data processing audit”.

Procedures

1. Membership

The YWR gives ongoing information about the company’s activities to its members by way of its Newsletter, email, website (and discussion forum) and occasionally telephone. In order to do this members’ personal data is held on an electronic database maintained by the membership secretary who is both a YWR director & member.

Data collected is primarily from the membership form and comprises:

Name	Relevant interests & skills
Address	Gift aid certification
Telephone number	
Email address	

When a person becomes a member this data is collected and included on the electronic database. They consent to their data being used for the above purposes by indicating on the form.

The legal justification for holding this data is that it relates to a contract which the individual has entered into. This enables the YWR to post a member's newsletter, send group or individual emails (for general notices or specific activities relevant to the member), set up an internet forum user account or telephone the member. No approaches are made to a member other than for relevant purposes.

When a person ceases to be a member, their data is retained for a year after which it is destroyed.

2. Volunteers

The YWR has many volunteers working on the railway and associated sites together with other locations. The company has a legal obligation to manage the health & safety of its volunteers and it is therefore justified to keep volunteers' relevant personal data.

Additionally, many volunteers have particular interests & skills. Using such personal data enables the YWR to match volunteers to relevant tasks, thus progressing the railway project effectively but also enabling skills to be shared and training to be identified & implemented.

When a person ceases to be a member, their data is retained for a year after which it is destroyed.

3. 3rd parties

The YWR interacts with many 3rd party individuals. These include some of our suppliers, certain officials, the visiting public and competition entrants

The majority of suppliers and officials act within their business capacity or as a representative of (for example) a local authority and it is not anticipated that any holding of the individual's personal data will arise in these circumstances.

No personal data is requested from the visiting public, however there are some situations where such data becomes held by the YWR, such as the site 'Visitor Book' & also survey respondents. In neither case are individuals asked for specific personal data.

Competition entrants, including grand draw entrants give the YWR personal data to enable the YWR to carry out its contract. Such data is only used with the specific written permission of the entrants, eg: for statistical information, or where an individual's work is used in an anthology; otherwise it is subsequently destroyed.

Such data is kept in paper format (draw ticket stubs) or electronically.

Rights of Individuals

Under GDPR individuals have enhanced rights over their personal data:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making & profiling

The YWR advises individuals of this Privacy Policy via its website together with providing written details to new members & on request. Additionally, existing members have been informed en masse with their May 2018 newsletter.

Security

Only the current directors & authorised managers have access to individuals' personal data. They are trained in data protection using these notes.

All data held on paper is retained securely with a director or on site, with access only gained by the above. Electronically held data is retained on password protected computers by authorised personnel or on cloud software with like access.

Other websites

We are not responsible for controlling personal data on websites visited from links provided by our website. Please review those organisations' privacy policies.

Photographs

Photographs can be taken on the YWR's premises & at events on and off site, which may be used for promotional purposes including on our website, social media, in members' newsletters and the local & national press.

Consent to use an image will be treated as given by default unless you make other wishes clear at the time. If you would like an image of yourself removed from our archives, please get in touch.

Approved by the board of directors: 5 July 2018. Reviewed 6 December 2018.