

NARROW GAUGE RAILWAY SOCIETY

PRIVACY POLICY



The Narrow Gauge Railway Society treats the privacy of its Members, Website Users and Journal Subscribers very seriously and takes appropriate security measures to safeguard their privacy. This Policy explains how the Society protects and manages any personal data provided to us and what we hold about them, including how we collect, process, protect and share that data.

The NGRS considers that in paying your subscription you have entered a contract for the provision of the Society's services, therefore there is no requirement to indicate an unequivocal consent to keep your data. Other services you may receive from the Society are considered to be covered by the legitimate interest provisions. Life members and others who receive free access to the Society's services are considered to have consented to enter the same relationship as paying members.

Personal data means any Information that may be used to identify an individual, including, but not limited to, a first and last name, a home or other physical address and an email address, telephone number or other contact information, whether at work or at home.

Any Data Protection queries should be addressed to the Company Secretary, who may be contacted via the Society's Registered Office (246 Hillbury Road, Warlingham, Surrey CR6 9TP) or by email <secretary@ngrs.org>.

How we obtain your personal data information provided by you

You provide us with personal data with your application when you join the Society or subsequently. You may have provided the information by post, email, on the society's website or over the telephone.

This information includes name, address, email address, telephone number, etc. We use this information in order to manage and administer your membership of and subscription to the Society and to communicate relevant material by post or email. The material includes the Society's magazines, subscription reminders, notification of meetings (including local area group meetings), Library open days, visit details, events, sales invoices, sales receipts, and other publications.

We may also retain information contained in any correspondence you may have with us by post or by email.

Young Persons

There are currently no full members under the age of 16 years; should any such young person wish to become a Full Member they will be required to obtain their parent or guardians consent. In the case of Associate Members, we retain no data other than that provided by the relevant associated Full Member who will have consented to their membership.

information we get from other sources

We only obtain information from third parties if this is permitted by law. We may also use legal public sources to obtain information about you, for example, your telephone number where the need arises to contact you quickly.

This information (including your name, address, email address, etc.), as relevant to us, will only be obtained from reputable third-party companies that operate in accordance with the General Data Protection Regulation (GDPR). You will already have submitted your personal data to these companies and agreed for it to be in the public domain.

How we use your personal data

We use your personal data to manage and administer your membership of or subscription to the Society. We also act as controller in regard to the processing of your Direct Debit instructions and other means of electronic payment, if applicable. We will take reasonable security measures to protect your personal data, including any financial details, in a manner which is consistent with the Society's duty of care and the requirements of the GDPR concerning data protection. We will also take reasonable security measures to protect your personal data in storage.

We may subcontract certain services associated with the administration of your membership, e.g. mail fulfilment and collection of Direct Debits, these services are carried out by organisations subject to the General Data Protection Regulation.

Do we use your personal data for marketing purposes?

Any contact information that you choose to give us may be used to advertise publications, events, visits, meetings and Library open days whether in the Society's magazines, fliers etc. either accompanying Subscription mailings or by, letters or email or text message. We will advertise only the Society's own material, events, visits, clothing and promotional items or items which we sponsor or consider are of particular relevance to the aims of the Society.

Information about cookies

A cookie is a small text file stored on your browser on your computer, for example Firefox. Currently the Society does not make use of cookies, please refer to www.ngrs.org for further information.

Sharing information

The Society's officers will keep information about you confidential. We will only disclose your information to other third parties with your express consent, except for the following categories of third parties:

- regulatory authorities and any legal or crime prevention agencies in order to comply with legal and regulatory issues and disclosures;
- any independent scrutineers of elections, mailing, fulfillment or printing agents, contractors and advisors that provide a service to us or act as our agents and those individuals and organisations that host our visits on the understanding that they keep the information confidential;

Transfer of your personal data outside the European Economic Area (EEA)

We do not transfer your personal data outside the EEA.

How long do we keep this information about you?

We keep your personal information for an appropriate period in order to manage and administer your membership. This includes retention of financial information such as Direct Debit and electronic payments in order to satisfy legal or statutory requirements and the requirements of our Public Liability and other insurances.

Data subject rights

Subject access requests

The GDPR grants you (hereinafter referred to as the "data subject") the right to access particular personal data that we hold about you. This is referred to as a subject access request. We shall respond within a reasonable period from the time of receiving the request and all necessary information from you. Our formal response will include details of the personal data we hold about you, including the following:

Sources from which we acquired the information; the purposes for processing the information; persons or entities with whom we are sharing the information. The data subject may also review and edit the personal data we hold about them through the Membermojo application on our website (www.ngrs.org).

Right to rectification

You, the data subject, have the right to obtain from us, without undue delay, the rectification of inaccurate personal data we hold concerning you. Taking into account the purposes of the processing, you, the data subject, have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure

You, the data subject, have the right to obtain from us the erasure of personal data concerning you without undue delay.

Right to restriction of processing

Subject to exemptions, you, the data subject, have the right to obtain from us restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by you, the data subject, and is restricted until the accuracy of the data has been verified;
- the processing is unlawful and you, the data subject, oppose the erasure of the personal data and instead request the restriction in its use;
- we no longer need the personal data for the purposes of processing, but it is required by you, the data subject, for the establishment, exercise or defence of legal claims;

- you, the data subject, have objected to processing of your personal data pending the verification of whether there are legitimate grounds for us to override these objections.

Notification obligation regarding rectification or erasure of personal data or restriction of processing

We shall communicate any rectification or erasure of personal data or restriction of processing as described above to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort. We shall provide you, the data subject, with information about those recipients if you request it.

Right to data portability

You, the data subject, shall have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller, without hindrance from us.

Right to object

You, the data subject, shall have the right to object, on grounds relating to your particular situation, at any time, to the processing of personal data concerning you, including any personal profiling; unless this relates to processing that is necessary for the performance of a task carried out in the public interest or an exercise of official authority vested in us. We shall not process the personal data unless we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of you, the data subject, or for the establishment, exercise or defence of legal claims.

Right to not be subject to decisions based solely on automated processing

We do not carry out any automated processing which may lead to an automated decision based on your personal data.

Invoking your rights

If you would like to invoke any of the above data subject rights with us, please contact the Company Secretary.

Accuracy of information

In order to provide the service to our members, we need to keep accurate personal data about you. We take reasonable steps to ensure the accuracy of any personal data or sensitive information we obtain. We ensure that the source of any personal data or sensitive information is clear and we carefully consider any challenges to the accuracy of the information. We also consider when it is necessary to update the information, such as name or address changes and you must help us by informing us of these changes when they occur.

Important information

Questions and queries

If you have any questions or queries which are not answered by this Privacy Policy, or have any potential concerns about how we may use the personal data we hold, please contact the Company Secretary.

Policy changes

This Privacy Policy is regularly reviewed. This is to make sure that we continue to meet the appropriate standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend this Policy. We suggest that you review this Privacy Policy from time to time to ensure you are aware of any changes we may have made. However, we will not significantly change how we use information you have already given to us without your prior agreement. The latest version of this policy can be found at www.ngrs.org or obtained from the Company Secretary.

If you have a complaint

If you have a complaint regarding the use of your personal data or sensitive information then please contact the Company Secretary and we will do our best to help you.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioner's Office (ICO), you can contact them on 01625 545745 or 0303 123 1113. You also have the right to judicial remedy against a legally binding decision of the ICO where you consider that your rights under this regulation have been infringed as a result of the processing of your personal data. You have the right to appoint a third party to lodge the complaint on your behalf and exercise your right to seek compensation.

The Narrow Gauge Railway Society is a company limited by guarantee (9925208) (Registered Office: 246 Hillbury Road, Warlingham, Surrey CR6 9TP)