

# **GDPR & Data Privacy Policy**

(Version 0.1 - Draft - Last updated 27 Feb 2023)

# 1. Purpose of GDPR Privacy Policy

Maintaining your privacy is really important to us. You entrust us with your information, and we take that responsibility seriously.

Shildon Railway Institute ("we", "us", "our") take security and privacy seriously. This Privacy Policy explains how we collect, store and use personal data when you join Shildon Railway Institute as a member, purchase tickets or products from us online or otherwise provide your personal data to us. Please read this Privacy Policy carefully to understand how we will treat your personal data.

Shildon Railway Institute which is a Community Benefit Society regulated by the Financial Conduct Authority and is based at 78 Redworth Road, Shildon, Co Durham, DL4 2JJ, and for the purposes of this policy fulfils the role of the Data Controller.

This policy explains clearly how we collect, process and store data. We do not knowingly collect or solicit any personal data from anyone under the age of sixteen, the minimum age for membership of Shildon Railway Institute, or knowingly allow such persons to register for membership. In the event that we learn that we have collected personal data from a child under age sixteen, we will delete that information as quickly as possible.

Queries about this policy can be directed to the serving Secretary of the Management Committee of Shildon Railway Institute at the address above, or at the following email address.

enquries@shildonrailway.institute

#### 2. Data Processors

Our data processing partners are as follows:

For data pertaining to membership of Shildon Railway Institute, and to our staff, we do not use any external data processing partner. Data is captured and stored on the premises by our staff.

For data pertaining to booking enquiries raised through our website <a href="www.shildonrailway.institute">www.shildonrailway.institute</a> our processing partner is <a href="one.com">one.com</a> whose UK office is 33 Cavendish Square, London, W1G 0PW. The processing involves capture of data from customers wishing to book any of our bookable spaces or services, and transporting that information by email to our Stewardess, Secretary and Webmaster.

For data pertaining to customers buying tickets to our events we occasionally use the data processor Eventbrite UK Limited, 10-11 Charterhouse Square, London, EC1M 6EE. The processing involves capture of information from persons wanting to purchase a ticket online for an event where we have made tickets available online and making that information available to our Management Committee.

For data pertaining to online purchases of goods offered by Shildon Railway Institute we use the data processor Freewebstore Ltd, Slater Terrace, Sandygate, Burnley, Lancashire, BB11 1BU. This processing involves the capture of data relating to customer orders for good purchased and the transport of that information to our Webmaster so that orders can be fulfilled.

For marketing emails to our members and subscribed interested parties we use a mailing service named MailChimp which is operated by the data processor Intuit Inc. trading as The Rocket Science Group, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, Georgia 30308, United States. The processing involves maintaining a secure list of email addresses to which our marketing messages are to be distributed. MailChimp managed subscription to and unsubscribing from this list.

We do not share any personal customer, member or staff data with any external third party.

## 3. How We Collect Data

- **3.1 Membership Data** We collect and maintain personal data relating to members of Shildon Railway Institute. This is collected through completion of a physical membership form on our premises. Data collected includes: Forename, Surname, Address, Email Address, Telephone Contact Number, Number of Shares Held, Permission to Send Updates on Institute Events and Services
- **3.2 Event Ticket Data** We collect and maintain personal data relating to orders placed online for tickets for events run by Shildon Railway Institute. This is collected through completion of an online form on our processing partner (Eventbrite's) sales platform. Data collected includes: Forename, Surname, Address, Email Address, Telephone Contact Number, Event, Number of Tickets. Though tickets are purchased, the payment is handled by the processing partner as sales agents on behalf of Shildon Railway Institute, and we do not receive any data relating to method of payment.
- **3.3 Online Product Order Data** We collect and maintain personal data relating to orders placed online for tickets for events run by Shildon Railway Institute. This is collected through completion of an online form on our processing partner (Freewebstore's) sales platform. Data collected includes: Forename, Surname, Address, Email Address, Telephone Contact Number, Product Name, Product Quantity. Though products are purchased, the payment is handled by the processing partner as sales agents on behalf of Shildon Railway Institute, and we do not receive any data relating to method of payment.
- **3.4 Room and Hall Booking Query Data** We have a booking query form on our website that enables interested parties to query the availability of a certain bookable space in a certain date, and captures

details relating to the purpose of the booking. We capture Customer Name, which Room, whether bar services are required, and how many guests are intended to attend.

Though Shildon Railway Institute maintains social media pages on Facebook, Instagram and Twitter, this organisation neither capture personal data from, nor share personal data, through these social media channels.

#### 4. How We Use Data

#### **4.1 Membership Data** - we use Membership Data to understand:

- · How many members we have,
- · Who our members are.
- · How long our members have held their membership,
- Which members hold a share.
- Whether members are current or not

We will use membership data for the following purposes:

- To enable us to communicate with members under the terms of our rules as a Community Benefit Society - for example to issue reminders for renewal of subscriptions or to notify of member meetings.
- To understand who has eligibility to vote in decision making pertaining to Shildon Railway Institute.
- Where permission has been given by an individual, to send marketing messages to members by email (e.g. news of upcoming events)
- To enable return of share payments to members should their membership cease

We are required to maintain a register of members in order to comply with our obligations as a registered Community Benefit Society

#### **4.2 Event Ticket Data** - we use event ticket data to understand:

- Who has bought tickets to events we are running where such tickets have been offered for sale online.
- Which event each ticket has been sold for.
- Who to trigger a refund to if the event has been cancelled (refunds are then processed by the ticketing platform as sales agent)

#### **4.3 Product Purchase Data** - we use product purchase data to understand:

- Who has bought Shildon Railway Institute products (e.g. CDs, Physical tickets, T-shirts, Badges)
  offered for sale online.
- · Which product has been bought.
- Where products are to be sent
- Who to trigger a refund to if the product cannot be fulfilled (refunds are then processed by the ticketing platform as sales agent)

## 4.4 Room and Hall Booking data - We use room booking data to understand:

- When is interested in booking our rooms or facilities.
- To be able to contact a person about their booking query.
- Which rooms have been booked by whom, when for and what their basic requirements are for that booking.

#### 5. How We Disclose Data

Shildon Railway Institute does not share disclose any personal member or customer data held to any third party organisation.

## 6. How We Store Your Personal Data

- **6.1 Membership Data** is stored in a password protected digital database with secure cloud backup accessed via a password protected computer in a secure Management Committee office on the Shildon Railway Institute premises. The physical forms that members use to submit their application to become a member are destroyed as soon as their application has been processed by the member of the Management Committee responsible for maintaining membership. Digital records of members are kept for the duration of the data subject's membership plus a period of 25 calendar months from their most recent renewal (for subscribing members to allow for last renewals), for 100 days from date of resignation of a member (to allow for repayment of share), or 100 days from notification of the death of a non-subscribing lifetime member being received (for members that qualified for lifetime membership).
- **6.2 Online Event Ticket Data** is stored against an account held by Shildon Railway Institute in Eventbrite's own secure online password protected platform accessible by a designated member of Shildon Railway Institute's Management Committee. The data is never exported from that platform or printed, and is deleted according to the ticketing platform's own data retention policy after the event for which the ticket was bought. It is necessary to keep the information for a period after the event to enable resolution of complaints and refunds.
- **6.3 Online Product Purchase Data** is stored against an account held by Shildon Railway Institute in the Freewebstore's own secure online password protected platform accessible by a designated member

of Shildon Railway Institute's Management Committee. The data is never exported from that platform or printed, and is deleted 90 days after the product was bought. It is necessary to keep the purchase information for a period after the event to enable resolution of complaints and refunds.

- **6.4 Mailing List data** is stored against an account held by Shildon Railway Institute on MailChimp's own secure password protected platform, which can be managed by the member of the Shildon Railway Institute Management Committee responsible for maintaining the Register of Members. Data is never exported from that platform. It is deleted immediately upon a person clicking the 'Unsubscribe' link that is shown at the foot of each message sent or contacting us at <a href="mailto:enquiries@shildonrailway.institute">enquiries@shildonrailway.institute</a>
- **6.5 Room and Hall Booking Query Data** is stored in a password protected email account hosted by One.com. This data is retained for 90 days after the date of the resultant booking before being deleted. The 90 day period is used to ensure that an post-event/booking queries or disputes can be resolved before deletion.

# 7. Your rights as a Data Subject

- Access to your personal data: You can ask us to confirm if we are processing your personal
  data and you may request a copy of your personal data by contacting us at
  enquiries@shildonrailway.institute or writing to us at the address at the top of this policy.
- Right to change or withdraw your consent: Where you have given us consent to make use of
  your personal data for any of the purposes outlined in this policy, you may withdraw that consent
  at any time by at <a href="mailto:enquiries@shildonrailway.institute">enquiries@shildonrailway.institute</a> or writing to us at the address at the top of
  this policy. If you wish to change your contact preferences or no longer wish to be contacted for
  marketing purposes, use the Unsubscribe link in the email or contact us at
  <a href="mailto:enquiries@shildonrailway.institute">enquiries@shildonrailway.institute</a> or write to us at the address at the top of this policy.
- Right to Rectification: You may ask us to update out of date or inaccurate information we hold
  about you. Please contact us at <a href="mailto:enquiries@shildonrailway.institute">enquiries@shildonrailway.institute</a> or write to us at the address
  at the top of this policy.
- Right to Erasure: In certain circumstances you may ask us to erase your Personal Data. If you
  would like us to erase the personal data we hold about you, please contact us at
  enquiries@shildonrailway.institute or write to us at the address at the top of this policy. Please
  be aware that we are unable, for regulatory reasons, to have members that are not recorded on
  our Register of Membership so this will involve the termination of any membership you hold.
- Right to Data Portability: In certain circumstances you may ask us to provide you with the
  personal data that we hold about you in a structured, commonly used, machine readable form,
  or ask for us to send such personal data to another data controller.
- Right to Object: In certain circumstances you may object to our processing of your personal data. Please get in touch at <a href="mailto:enquiries@shildonrailway.institute">enquiries@shildonrailway.institute</a> or write to us at the address at the top of this policy.

- Right to Restrict Processing: You can ask us to restrict the processing of personal data we
  hold about you in certain circumstances. Please get in touch at
  enquiries@shildonrailway.institute or write to us at the address at the top of this policy.
- Getting in touch: To make enquiries and/or to exercise any of your rights in this privacy policy
  please contact us at <a href="mailto:enquiries@shildonrailway.institute">enquiries@shildonrailway.institute</a> or write to us at the address at the top of
  this policy.

# 8. How to Complain

Make a complaint: You may make a complaint about our data processing activities, please contact our Management Committee at <a href="mailto:enquiries@shildonrailway.institute">enquiries@shildonrailway.institute</a> or write to us at the address at the top of this policy.

# 9. Changes of Privacy Policy

We may modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically. When we change the policy in a material manner we will let you know via notices on our website and premises and will update the 'last updated' header on the republished policy as above.

#### 10. Contact

If you have any questions about this Privacy Policy you can contact us at <a href="mailto:enquiries@shildonrailway.institute">enquiries@shildonrailway.institute</a> or write to us at the address at the top of this policy.