



## Privacy Notice

### Introduction

This Privacy Notice explains the practices of the North Eastern Locomotive Preservation Group (“**NELPG**”, “**we**”, “**our**” or “**the Company**”) concerning information collected from users who access our website at [www.nelpg.org.uk](http://www.nelpg.org.uk) (“**Site**”) or otherwise share personal information with us (collectively: “**Users**”). We may also collect information depending on a membership or volunteer status (collectively: “**Members**”).

### Grounds for data collection

Processing of your personal information (i.e., any information which may potentially allow your identification through reasonable means; hereinafter “**Personal Information**”) is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject.

When you use the Site, you consent to the collection, storage, use, disclosure, and other uses of your Personal Information as described in this Privacy Notice.

We prefer to collect the information we need directly from members to ensure you know what we have and that it is the most accurate and up-to-date information.

If you think that any information we hold about you is inaccurate please tell us as soon as possible how to correct it.

We encourage our Users and Members to carefully read the Privacy Notice and use it to make informed decisions.

### What information do we collect?

The information we collect may vary depending on your status as a user or member. We collect two types of data and information from Users.

The first type of information is unidentified and non-identifiable information about a User(s), which may be made available or gathered via your use of the Site (“**Non-personal Information**”). We are not aware of the identity of the User from which the Non-personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g., the type of browser and operating system your device uses, language preference, access time, etc.) in order to enhance the functionality of our Site. We may also collect information about your activity on the Site (e.g., pages viewed, online browsing, clicks, actions, etc.).

The second type of information **Personal Information** is individually identifiable information, namely information that identifies an individual or may, with reasonable effort, identify an individual. Such information includes:

As a site user:

- **Device Information:** We collect Personal Information from your device. Such information includes geolocation data, IP address, unique identifiers (e.g., MAC address and UUID) and other information which relates to your activity through the Site.

As a member:

- **Registration information:** When you register with our Site you will be asked to provide us with certain details such as: full name; email or physical address, and other information.
- **Membership information:** Your full name, date of birth, telephone number, home address and email address so we know who our members are and what level of affiliation they have in order to fulfil our legal requirements for membership records.
- These contact details will enable us to keep in contact you with news of our activities.
- If you volunteer with the restoration, maintenance and running of the locomotives we may also need other more personal information to enable us to hold 'In Case of Emergency' information about your emergency contacts, social circumstances, and the status of your health so that we can act accordingly should the need arise. We'll only collect this sort of information should the need arise.
- Similar contact details may be held for individuals of external organisations who we deal with.
- We only collect information about you that we need to make sure you get the best from us.

### **How do we receive information about you?**

We receive your Personal Information from various sources:

- When you voluntarily provide us with your personal details in order to register on our Site.
- When you use or access our Site in connection with your use of our services.
- When you become a new member.
- When we contact you through membership activities.
- When we contact your organisation or service.
- If you inform us of any material change in the information we hold.
- If you vote or use a proxy vote to give us your up-to-date details.
- From third-party providers, services, and public registers (for example, traffic analytics vendors).

If you think that any information we hold about you is inaccurate please tell us as soon as possible how to correct it.

### **What do we do with the information we collect about you?**

User information may be handled in various ways:

- Communicating with you – sending you notices regarding our services, providing you with technical information and responding to any customer service issue you may have.
- To communicate with you and to keep you informed about our latest updates and services.
- To serve you advertisements when you use our Site (see more under "Advertisements").
- To market our websites and products (see more under "Marketing").
- For statistical and analytical purposes, intended to improve the Site.

We use membership information in various ways:

- Manage your membership and obligations to the Company.
- Provide you with information about the activities we provide.

- Seeking your views on activities of the Company.
- Dealing with any problems, enquiries, or complaints you may have.
- Manage and run the activities of the Company.
- Manage our contacts with external organisations.
- Keeping our records up to date.
- Shared amongst the officers of the Company as required by them to perform their duties.
- Shared with external organisations where the Company has a duty to pass this information on to enable the running of our locomotives.
- Comply with any legal obligations the Company may have.

We will not share your information with any other external organisation or person unless:

- You have specifically instructed us to do so.
- The requirements of statutory bodies such as Police, Fire, or Local Authorities require us to do so.

Whenever information is shared, we will do everything we can to make sure it is protected from misuse or loss.

We may also disclose information if we have good reason to believe that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies (including our Agreement), including investigations of potential violations thereof; (iii) investigate, detect, prevent or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our users, yourself or any third party; or (vi) to collaborate with law enforcement agencies and/or in case we find it necessary to enforce intellectual property or other legal rights.

## **Your Rights**

You may request to:

- Receive confirmation as to whether personal information concerning you is being processed and access your stored personal information, together with supplementary information.
- Receive a copy of personal information you directly volunteer to us in a structured, commonly used, and machine-readable format.
- Request rectification of your personal information that is in our control.
- Request the erasure of your personal information.
- Object to the processing of personal information by us.
- Request to restrict processing of your personal information by us.
- Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute and may be subject to our own legitimate interests and regulatory requirements.

If you want to see the information that we have about you, you can make a data subject access request by contacting us at the address shown at the end of this notice.

We may reply to you where we need further information to help respond effectively to your request.

To make sure that we only give your information out to you and not someone else, you will need to provide us with some form of identification. We will respond to your request within 28 calendar days.

If you wish us to stop contacting you by any particular means you will have the opportunity to do so every time we contact you.

## **Retention**

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes and enforce our policies. Retention periods will be determined considering the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable opportunity. Under applicable regulations, we will keep records containing client personal data, account opening documents, communications, and anything else as required by applicable laws and regulations.

We may rectify, replenish, or remove incomplete or inaccurate information, at any time and our discretion.

## **Cookies**

We and our trusted partners use cookies and other technologies in our related services, including when you visit our Site or access our services.

A “cookie” is a small piece of information that a website assigns to your device while you are viewing a website. Cookies are very helpful and can be used for different purposes. These purposes include allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences, and making the interaction between you and our Services quicker and easier. Cookies are also used to help ensure that the advertisements you see are relevant to you and your interests and to compile statistical data on your use of our Services.

The Site uses the following types of cookies:

- a. 'session cookies'** which are stored only temporarily during a browsing session to allow normal use of the system and are deleted from your device when the browser is closed.
- b. 'persistent cookies'** which are read only by the Site, saved on your computer for a fixed period and are not deleted when the browser is closed. Such cookies are used where we need to know who you are for repeat visits, for example, to allow us to store your preferences for the next sign-in.
- c. 'third-party cookies'** which are set by other online services that run content on the page you are viewing, for example by third-party analytics companies who monitor and analyse our web access.

Cookies do not contain any information that personally identifies you, but Personal Information that we store about you may be linked, by us, to the information stored in and obtained from cookies. You may remove the cookies by following the instructions of your device preferences; however, if you choose to disable cookies, some features of our Site may not operate properly and your online experience may be limited.

We also use a tool called “Google Analytics” to collect information about your use of the Site. Google Analytics collects information such as how often users access the Site, which pages they visit, when they

do so, etc. We use the information we obtain from Google Analytics only to improve our Site and services. Google Analytics collects the IP address assigned to you on the date you visit sites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics [Terms of Use](#) and the [Google Privacy Policy](#) .

### **Third-party collection of information**

Our notice only addresses the use and disclosure of information we collect from you. To the extent you disclose your information to other parties or sites throughout the internet, different rules may apply to their use or disclosure of the information you disclose to them. Accordingly, we encourage you to read the terms and conditions and privacy notice of each third party that you choose to disclose information to.

This Privacy Notice does not apply to the practices of companies that we do not own or control, nor to individuals whom we do not employ or manage, including any of the third parties to whom we may disclose information to as set out in this Privacy Notice.

### **How do we safeguard your information?**

We take great care in implementing and maintaining the security of the Site and your information.

When we use information about you, we make all reasonable efforts to do so fairly and lawfully.

While we are sure that our members, volunteers, and contacts know we use their information, we will provide notice of this whenever we can.

We never use information about you unless it is lawful for us to do so and we have a clearly defined need or purpose.

When we collect information about you, we make sure that we minimise what we collect. We try to collect enough accurate and up-to-date information, so we can provide you with the information we both require from time to time. We try not to keep your information for longer than we need it and we make sure that the records we have about you are managed properly and deleted promptly and securely when we no longer need them.

We make every effort to keep your information safe, which we detail below.

We take appropriate care to secure the information we hold about you. We have robust technical security such as passwords and information encryption. We have policies and procedures to make sure your information is only available to our officers who need to see it to fulfil their duties, and we train them appropriately.

We establish robust procedures and contracts to extend these protections to any other person or organisation we may need to give your information to.

In everything we do with your information, we try to be fair, lawful, and open, and we take seriously our obligations towards your privacy and the protection of the information we may hold about you.

Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorised access or abuse our Site, and we make no warranty, express, implied, or otherwise, that we will prevent such access.

## **Transfer of data outside the EEA**

Please note that some data recipients may be located outside the EEA. In such cases, we will transfer your data only to such countries as approved by the European Commission as providing an adequate level of data protection or enter into legal agreements ensuring an adequate level of data protection.

## **Advertisements**

We may use a third-party advertising technology to serve advertisements when you access the Site. This technology uses your information with regard to your use of the Services to serve advertisements to you (e.g., by placing third-party cookies on your web browser).

You may opt out of many third-party ad networks, including those operated by members of the Network Advertising Initiative (“NAI”) and the Digital Advertising Alliance (“DAA”). For more information about this practice by NAI and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third-party ad networks operated by NAI and DAA members, please visit their respective websites: <http://optout.networkadvertising.org/#/> and <http://optout.aboutads.info/#/>

## **Marketing**

We may use your Personal Information such as your name, email address, telephone number, etc., ourselves or by using our third-party subcontractors, to provide you with promotional materials concerning our services which we believe may interest you.

To respect your right to privacy, within such marketing materials, we provide you with the means to opt out of receiving further marketing offers from us. If you unsubscribe, we will remove your email address or telephone number from our marketing distribution lists.

Please note that even if you have unsubscribed from receiving marketing emails from us, we may send you other types of important email communications without offering you the opportunity to opt out of receiving them. These may include customer service announcements or administrative notices.

## **Corporate Transaction**

We may share information in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation, or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Notice.

## **Minors**

We understand the importance of protecting children’s privacy, especially in an online environment. The Site is not designed for or directed at children. Under no circumstances shall we allow the use of our services by minors without prior consent or authorisation by a parent or legal guardian. We do not knowingly collect Personal Information from minors. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at the address as shown at the end of this document.

## **Updates or amendments to this Privacy Notice**

We reserve the right to periodically amend or revise the Privacy Notice; material changes will be effective immediately upon the display of the revised Privacy Notice. The last revision will be reflected in the “Last modified” section. Your continued use of the Platform, following the notification of such amendments on our website, constitutes your acknowledgement and consent of such amendments to the Privacy Notice and your agreement to be bound by the terms of such amendments.

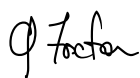
### **Changes to this Privacy Notice**

From time to time, we may amend this privacy notice to reflect changes in the law, notifications by the ICO or our experience in maintaining our obligations towards this notice. Any amendments will be posted on our website. We therefore suggest you check our online privacy statement from time to time to make sure you are aware of the latest version.

### **How to contact us**

If you have any general questions about the Site or the information we collect about you and how we use it, you can contact us at: NELPG, 67 The Mount, YORK, YO24 1AX.

C J Foxton



**Director/Trustee  
NELPG**

