

# Cymdeithas Rheilffordd Eryri

## Privacy Statement

### Introduction

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and how to contact us. We always seek to comply with the General Data Protection Regulation (GDPR).

### Who we are

Cymdeithas Rheilffordd Eryri (CRhE), also known as Welsh Highland Railway Society (WHRS), collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the GDPR which applies across the European Union (including in the UK) and we are responsible as 'controller' of that personal information for the purposes of the GDPR. The GDPR will be supplemented in due course by additional UK specific data protection legislation.

### What personal information do we collect?

We collect personal information about you when you:

- Become a member of CRhE, or apply to be one
- Receive information on the Society's activities
- Visit our website, join a mailing or marketing list, contact us on social media or by email, complete a survey or enter a competition organised by us
- Purchase products or services from any of our sites
- Donate to the Society
- Contract directly with us
- Contract with us as a third party
- Through the use of certain data capturing devices (for example studying which pages of our website you read the most through the use of cookies).

### Regarding Family Membership

We collect the names and address of additional adult family members to enable them to receive the benefits of and information about membership.

We collect the names, addresses and dates of birth of children under 18 years to ensure they receive the benefits of membership and pay the appropriate fees.

We do not send marketing materials to children.

### Donations and Legacies

We will process the personal details of donors for sufficient administration periods and to meet any legal requirements.

We will process the personal details of individuals making the will and any party associated with administering the will for sufficient administration periods and to meet any legal requirements.

We will obtain specific consent from family members or associates where they wish to be updated on the use of the legacy.

## How we use your personal information

We process your information in the following ways:

- For performance of our contract with you
- To process your membership application
- To provide you with information on the Society's activities
- To administer members' and supporters' payments and donations and to provide them with information about the progress and funding of Society projects
- To comply with our statutory and regulatory obligations
- To administer competitions
- To maintain our relationship with you supplying magazines, information, and details of Society activities
- To supply marketing material and undertake market research.

## How do we collect information?

You may give us the information orally, by web form, email, telephone or by letter.

## How long do we keep your personal data?

All personal data is kept no longer than is necessary and the length of time will vary depending on the activity by which your personal data is obtained:

- In the case of a volunteer your personal data is held by the Festiniog Railway Company not by CRhE.
- In the case of a contract concluded with CRhE we keep your personal data for a period of seven years from the date when the contract is completed.
- In the case of donors and other supporters, we assume that you will continue to be interested in hearing about the railways indefinitely so we will keep your contact details until you tell us to stop contacting you (which you can do at any time). If we have your bank details, we keep these for seven years after you cease to subscribe.

## What is the lawful basis for you processing my information?

We must have a lawful basis for processing your information; this will vary on the circumstances of how and why we have your information, but typical examples include:

- Data for the management of your membership is collected on the lawful basis of contract for the length of your membership and on the basis of legitimate interest for a period of seven years after you cease to be a member
- The activities are within our legitimate interests as a supporting Society of the Welsh Highland Railway seeking to engage with and provide services to prospective and current officials and members of the Society, volunteers and third parties or to archive important historical information
- The activities are within the legitimate interests of the Society in raising funds for the railways and in providing information to and maintaining contact with members and supporters

- We are carrying out necessary steps in relation to a contract to which you are a party or prior to you entering a contract
- To protect your vital interests e.g. if you were unfortunate enough to fall ill or suffer injury at a Society event

We do not process any special categories of information i.e. information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, processing of genetic or biometric data for the purpose of uniquely identifying individuals, health data, or data concerning your sex life or sexual orientation or information revealing criminal convictions or offences.

## Disclosure of your information

Some of the information you provide to us may be transferred to, stored and processed by third party organisations who process data on our behalf. These third parties may be based (or store or process information) in the United Kingdom, or elsewhere including outside of the European Economic Area (EEA). These third parties may include third party IT platforms (including cloud-based platforms), suppliers of administrative and support services and suppliers of other specialist products. We do not sell your personal data to third parties.

If you donate or subscribe to the Society, your personal information may be provided to your bank (if you pay by standing order); to HMRC (if your donation is gift aided) and to the parties involved in providing any benefits you become entitled to in connection with your donation

We may share your details with companies owned by Ffestiniog & Welsh Highland Railways Trust (Charity No. 239904) which includes Ffestiniog Railway Company (Co. No. ZC000203), and with Ffestiniog Railway Society (Charity No. 1064178).

If as a donor you notify the Society of a change of contact details, we may pass this on to either or both organisations where appropriate.

We may be obliged to disclose data by order of a court, by statute or by order of the Office of Rail and Road Regulation, or we may be permitted to disclose it under applicable data protection laws in other circumstances.

## How do we protect your information?

All our computers are protected by firewalls and reputable anti-virus software to which all patches and updates are applied as soon as possible. External servers are similarly protected and provided by organisations we trust. Our computers and programmes are protected by passwords. Information in hard form is kept in locked drawers or filing cabinets.

Where we transfer information to third parties to enable them to process it on our behalf, we ensure that the providers meet or exceed the relevant legal or regulatory requirements for transferring data to them and keeping it secure.

We may transfer your personal information to countries which are located outside the European Economic Area (EEA) or UK as follows:

- When using outsourced IT or other administrative support services

- When you are located outside of the EEA.

Such countries do not always have the same data protection laws as the United Kingdom and EEA but will ensure that where information is transferred to a country or international organisation outside of the UK/EEA, we will comply with the relevant legal rules governing such transfers that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information.

## Do we use cookies?

Cookies are small routines which enable the location and type of your computer or device, and browsing behaviour, to be identified. Cookies are managed under a dedicated policy on our website and users are given a choice to Accept or Decline when browsing the website.

## What are your rights concerning our use of your personal information?

Under GDPR your rights include:

- Right of access. You may request to see what data we hold about you
- Right to rectification and data quality. You may require us to correct data which are inaccurate or incomplete
- As a member your information is held on the legal basis of contract; and after the end of your membership on the basis of legitimate interest your data cannot be deleted
- Right to restrict processing. In this case we can retain the data but not use it
- Right of data portability - this does not apply as we do not process data by automatic means
- You can ask us to stop sending you direct marketing communications (e.g. brochures or email newsletters). Note that an 'unsubscribe' request will stop future mailings.

If you wish to exercise any of these rights, please email or write to us, and we will respond appropriately as quickly as possible. Furthermore, if you would like to discuss this policy, ask how we use your personal information, provide feedback or make a complaint please email or write to us.

## Contact information

Cymdeithas Rheilffordd Eryri  
Station View  
Dinas  
Caernarfon  
LL54 5UB

eMail: [crhe\\_enquiries@crhe.uk](mailto:crhe_enquiries@crhe.uk)

The Society is registered as a company (number 03157171) and as a charity (number 1094938) in England and Wales.

You can also contact the Information Commissioner's Office via <https://ico.org.uk> for information, advice or to make a complaint.

## Changes to this privacy notice

This privacy notice was last updated in November 2024.

We may change this privacy notice from time to time as our business and internal practices and/or applicable laws change. We will not make any use of your personal information that is inconsistent with the original purposes(s) for which it was collected or obtained (if we intend to do so ,we will notify you in advance wherever possible via our website and/or otherwise contacting you by post or email) or otherwise than is permitted by applicable law.