

PRIVACY POLICY AND INFORMATION NOTICE ON PROCESSING OF PERSONAL DATA

Last updated 23 February 2018

West Coast Railways, together with our holding company and affiliates, respect the privacy of every individual who visits/uses any of our websites.

This Privacy Policy applies to information that (i) you provide to us when you stay or travel with us (or make enquiries to stay or travel with us); and (ii) we collect from you when you visit our website. The following sections of this Privacy Policy describe the types of information we collect, how and for what purposes we use that information, with whom we share it, and the choices and rights available to you regarding our use of your information. We also describe the measures we take to protect the security of the information we hold and how to contact us about our privacy practices, and to exercise your rights.

1. Information we collect
2. Use of information
3. Sharing information
4. Your rights
5. Data transfers
6. How we protect your information
7. How long we keep information for
8. Links to other websites
9. Cookies
10. Updates to our Privacy Policy
11. How to contact us

1. Information we collect or information you provide on a voluntary basis.

We will collect, store and process information about you if you voluntarily provide us with such information in connection with the following:

- filling in a form on any of our websites;
- filling in a physical registration card;
- contacting us by telephone or face to face (e.g., in the context of making a reservation);
- sending us a letter, e-mail or social media message;
- subscribing to receive a service from us (e.g., a newsletter, blog or by following us on social media);
- requesting promotional information from us (e.g., information about any of our goods or services including West Coast Railways Gift Vouchers.);
- participating in a survey, competition or prize draw; or
- contributing content to us (e.g., for display on a West Coast Railways blog).

The types of information we may obtain include:

- your name, gender, home and work contact details, business title, e-mail address, telephone number, date and place of birth, nationality;
- details of food allergies/dietary requirements and special requests made (for example, relating to a disability) you provide to us;
- passport and visa information, payment information, travel history and details of joint travellers;
- dates of your stay or travel with us and associated charges;
- purchase or delivery of products or services;
- reviews and opinions about our brands, products and services;
- information we receive about you from any third parties through whom you have booked your arrangements.

We do not collect “sensitive information” (e.g., information on racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership) unless it is volunteered by you.

We may use medical or other sensitive data provided by you to better serve and meet your needs (but under no circumstances will we process any sensitive data for marketing and/or profiling purposes). Such sensitive information is not shared with any person or body not associated with West Coast Railways. The material or information provided will only be used by West Coast Railways or our third party service providers (acting as data processors) for the purpose of providing the services you request. By making such special requests or notifying us of such preferences, you agree to us sharing your information in this way.

Personal information we collect automatically

When you visit the West Coast Railways website, we may also collect certain information through the use of “cookies” and other automated means. Cookies are small pieces of information that are stored by your browser on your computer's hard drive. Such information may comprise the following information:

- Date and time;
- Originating IP address;
- Domain name;
- Type of browser and operating system used (if provided by the browser);
- URL of the referring page (if provided by the browser);
- Object requested;
- Completion status of the request;
- Geographic location; or
- Language preferences.

2. Use of information

Typically, we will use and process your information to:

- help us create content that is relevant to our visitors;
- make improvements to our websites and social media pages and ensure that content on these is presented in the most effective manner for you;
- provide you with information, products or services that you request from us or which we feel may interest you;
- assess and help us understand general trends and patterns relating to our business;
- provide for the safety and security of our guests and visitors;
- manage general record keeping;
- enable us to compile anonymous, aggregated statistics that allow us to understand how users use our websites and to help us improve the structure of our websites;
- enable you to make reservations, buy West Coast Railways gift vouchers and payments;
- meet any legal and/or regulatory requirements;
- provide the products or services you request from us; and
- improve our products and services and to ensure our products and services are of interest to you.

The processing of your personal information for:

- marketing and profiling purposes is managed solely by West Coast Railways. Your decision to provide your information for such purposes is optional and will have no consequence on your ability to stay with us or benefit from the requested services;
- all purposes concerning your booking, your stay and to provide you with the services you have requested, is managed by West Coast Railways. Your decision to provide information to us is voluntary. However, if you do not provide such information you may no longer be able to benefit from our services.

We may process your personal information by both automated and manual means. We may use your information in other ways for which we provide specific notice at the time of collection.

3. Sharing information

We do not sell, otherwise disclose, or share information we collect and hold about you, except as described in this Privacy Policy.

We may use this information to offer products and services to you consistent with the purposes identified in this Privacy Policy. We may also share information with service providers who perform functions and services on our behalf. Such third parties will be appointed as data processors and will be provided only with information necessary to perform the services on our behalf but are not authorised to use such information for any other purposes.

We may disclose information about you if we are required to do so by law or pursuant to legal process, or in response to a request from law enforcement authorities or other government officials.

We reserve the right to transfer information about you in the event that we sell or transfer all or a portion of our business or assets, in accordance with applicable law. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use information you have provided to us in a manner that is consistent with our Privacy Policy. Following such a sale or transfer, you may contact the entity to which we transferred your information with any inquiries concerning the processing of that information.

4. Your rights

You have certain rights to the information we process about you as expressly provided for by applicable law. You may request access to the information we hold about you, update, amend or correct the information, and in some circumstances you may object to our use of your information.

You also have the right to request that we cease sending marketing communications, whether by email or otherwise, to you. You can do this by (i) checking the applicable box(es) on any form used to collect information from individuals, or (ii) clicking the unsubscribe link displayed in any of the marketing e-mails you receive, or (iii) otherwise requesting that we do not process your information for marketing purposes, or (iv) via the West Coast Railways website.

Pursuant to California's "Shine the Light Act", California residents are permitted to request information about the manner in which we share certain categories of information with third parties for their marketing use

To exercise these rights or to make a complaint or submit an inquiry about our privacy practices, please contact us at privacy@westcoastrailways.net. You can also write to us at:

Central Marketing
West Coast Railways
Jesson Way
Carnforth
Lancashire
LA5 9UR

To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. Please note that if you opt out as described above, we will not be able to remove your information from the databases of third parties with whom we have already shared your information, with your consent. You should contact such third parties to opt out directly.

5. Data transfers

We will not transfer or store any information we collect about you in countries other than the country in which the information was originally collected.

6. How we protect your information

We maintain administrative, technical and physical safeguards designed to protect the information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. Services providers and contractors who might have access to your information in order to provide services on our behalf will be contractually obliged to keep such information in confidence, provide adequate data security measures, and may not use that data for any other purpose.

For your own protection, we encourage you not to include sensitive personal information, credit card or similar data in any e-mails you send us or our staff.

West Coast Railways do not store any credit card data or any other information regarding any payment method used to collect payments submitted to us for any booking or other purchases. This is the same whether you have made a booking or other purchase through our websites, by telephone or by post.

7. How long we keep information for

West Coast Railways only retains your information for as long as needed to fulfil the purposes for which it is collected, unless otherwise provided by law.

8. Links to other websites

Our websites may provide links to other websites for your convenience and information. These websites operate independently from us. Linked websites may have their own privacy policies, which we strongly suggest you review. To the extent that any linked websites you visit are not owned or controlled by us, we are not responsible for the websites' content, any use of the websites, or the privacy practices of the websites.

9. Cookies

A “cookie” is an element of data that a website can send to your browser which may then be stored on your system. We use cookies to gather information about the visitors to our websites (as they enable us to improve our websites and deliver a better and more personalised service). We do not associate the information in a website visitor’s cookie with any other information about that visitor.

The cookies we use on our websites, where you have accepted their use, are:

Cookie Name	Function
ARRPT	Ensures that the user stays on the same server throughout their visit, ensuring consistent functionality throughout a visit. This cookie is destroyed at the end of the user’s visit
JSESSIONID	Ensures that the user’s session is maintained and works in conjunction with ARRPT to ensure consistent functionality throughout a visit. This cookie is destroyed at the end of the user’s visit
sifrFetch	Allows use of flash to improve display of text (if the user’s browser supports it). This cookie is destroyed at the end of the user’s visit
user_countrycode lounge_user_countrycode user_lang_pref	These three cookies allow us to keep track of the users’ geographic location and language preferences in order to display them relevant targeted and localised content as applicable.
user_campaign user_creative user_placement internal_user_campaign internal_user_creative internal_user_placement	These cookies allow us to identify which of our marketing campaigns or internal promotions a user has been directed from/measure the effectiveness of campaigns/promotions.
user_id lounge_user_id	These cookies allow us to identify the user and customise their experience. They also allow us to pre-populate fields in tables with your data, assisting with form entry.

In addition, the following are the third party cookies in use, where you have accepted their use (which are each subject to their own privacy and cookie policies):

Third Party Cookie	Function
DoubleClick Advertising	Allows us to monitor (using non-personally identifiable data) the number and type of relevant searches made for it on Google. Privacy policy available at www.google.com/intl/en/privacy/ads/

Facebook Custom Audience	Allows West Coast Railways to create an audience using data held by Facebook to deliver interest-based advertising https://www.facebook.com/policy.php
Facebook Like Button	Allows users to choose to show our websites on their Facebook site. Privacy policy available at https://www.facebook.com/policy.php
Google Adwords	Google Adwords collects anonymous information on users of the Site through to conversion to enable tracking of marketing. The technologies utilized allow Adwords to collect this information entirely anonymously. Privacy policy can be found here : http://www.google.com/intl/en/policies/privacy/ You can opt-out of Google's use of cookies by visiting the Ads Preferences Manager, or through the Network Advertising Initiative opt-out page.
Google Analytics	Monitors usage of site (using non-personally identifiable data). Privacy policy available at www.google.com/intl/en/analytics/privacyoverview.html You can opt-out of Google's use of cookies by visiting the Ads Preferences Manager, or through the Network Advertising Initiative opt-out page.
Google Dynamic Remarketing	West Coast Railways are using 'Remarketing' to advertise online. This means that third-party vendors, including Google, will show ads on sites across the Internet. Google will use cookies to serve ads based on past visits to this website. Privacy policy can be found here : http://www.google.com/intl/en/policies/privacy/ You can opt-out of Google's use of cookies by visiting the Ads Preferences Manager, or through the Network Advertising Initiative opt-out page.
Google +1 Button	Allows users to choose to show our websites on their Google + account. Privacy policy available at www.google.com/intl/en/+/policy/+1button.html
Twitter Advertising	Allows interest-based advertising. Privacy policy https://twitter.com/privacy

We do not control the use of such third party technology and we are not responsible for any actions or policies of such third parties. When you access our websites you will receive a clear notice advising you that the website you are visiting intends to use cookies and that:

- i. by continuing to use the website you consent to their use; or
- ii. you must click an "I accept" box in order for cookies to be placed.

Unless you have adjusted your browser setting so that it will refuse cookies from our websites, our system will issue cookies. Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. You can find out how to do this for your particular browser by clicking "help" on your browser's menu or by visiting www.allaboutcookies.org. Please note, however, that without cookies you may not be able to take full advantage of all our websites features.

10. Updates to our Privacy Policy

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our processing of your information and privacy practices and changes in the law. We will post a prominent notice on the West Coast Railways website to notify you of any significant changes to our Privacy Policy and indicate at the top of the Privacy Policy when it was most recently updated.

11. How to contact us

If you have any questions or comments about this Privacy Policy, the use of cookies, if you would like us to update information we have about you or your preferences, or to exercise your rights of access, rectification, blocking, or deletion, or to object to the processing of your information, please contact us by email at privacy@westcoastrailways.net. You can also write to us at:

Central Marketing
West Coast Railways
Westfield House
7 Westfield Road
Wakefield
West Yorkshire
WF1 3RB

West Coast Railways are the UK's largest charter train operator and operate the Jacobite Steam Train, The Scarborough Spa Express, The Dalesman Steam Trip, Spirit Of The Lakes Trips, Railtours throughout the UK and The Northern Belle train trips.

This privacy policy covers all of our websites, telephone booking systems, enquiry systems and our email systems covering the above trips.