

## 1. Website privacy policy

- This privacy policy outlines how we use, store and share the personal information we collect about you in connection with our website [www.railholdings.scot](http://www.railholdings.scot) and when you contact us.
- It is important that you read this privacy policy together with any other privacy notice we may provide you on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your information. This privacy policy supplements the other notices and is not intended to override them.

## 2. About us and how to contact us

- We are Scottish Rail Holdings (SRH), an organisation controlled by Scottish Ministers. If you have any questions, comments or requests regarding your personal information you can contact us at:
- **Scottish Rail Holdings Ltd**  
Buchanan House  
58 Port Dundas Road  
Glasgow  
G4 0HF
- If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO).

## 3. The personal information we hold about you

- We use cookies to collect information about your use of our website.
- We use cookies to improve your experience of browsing our website and to assist us in improving our services.

## 4. Legal basis

- We only collect this information where you have provided us your consent to do so. Please see our Website Terms and [Conditions](#) for further information in relation to our use of cookies.
- We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
- If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

- Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. How long we hold your personal information

- SRH participates in the Scottish Government's records management process which sets out how long we keep information. The current Scottish Government policy and procedures in relation to records management are set out in the [Scottish Government's Record Management Plan](#).

## 6. Sharing your personal information

- We share your personal information with the third parties described below. We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.
- Google: Our reCaptcha webform protection is provided by Google, who collect information from the user's browser to help determine whether they are a legitimate user
- Squarespace: this website is provided by Squarespace, who use cookies and other technologies to collect anonymised information on how the website is being used

## 7. Where we store your personal information

- Your personal information may be stored inside the UK, the European Economic Area (EEA) or outside the EEA.
- We transfer personal information outside the UK or the EEA where our service providers or contractors host, process, or store information outside the UK or the EEA. Where we do this, we ensure a similar degree of protection is afforded to your personal by ensuring at least one of the following safeguards is implemented:
- The country to which the personal information will be transferred has been deemed to provide an adequate level of protection for personal information by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers or contractors, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to non-EU countries](#).
- Where we use providers based in the US, we may transfer information to them if they are part of the Privacy Shield which requires them to provide similar protection to personal

information shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

- Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of the EEA.

## **8. Protecting your personal information**

- We securely retain personal information on our internal records management system which has effective security procedures in place to prevent unauthorised access to personal data.
- Personal information that we hold in hard copy is stored in our secure entry buildings and we comply with Scottish Government security policies and procedures.
- We have contracts in place with third parties who process personal data on our behalf which requires them to protect your personal information and comply with all relevant data protection legislation.

## **9. Your rights**

- You have certain rights under data protection legislation which can be exercised by writing to Scottish Rail Holdings, Buchanan House, 58 Port Dundas Road, Glasgow G4 0HF, by namely:
- the right to access the personal information held about you by making a subject access request;
- the right to have your personal information rectified if it is inaccurate or incomplete;
- the right to request to have your personal information deleted in certain specific circumstances;
- the right to request the restriction of the processing of your personal information in certain specific circumstances;
- the right to ask us not to process your personal information for marketing purposes or for purposes based on our legitimate interests (where applicable);
- the right to ask us not to undertake automated decision making or profiling;
- the right to request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
- where you have provided consent, to request to withdraw such consent at any time; and
- the right to lodge a complaint with the UK Information Commissioner's Office.

- There are some exceptions to the above rights that are permitted under the data protection legislation. Please note that if you choose to exercise your rights to have personal information restricted or deleted, then we may not be able to provide you with our services.

**10. No fee usually required**

- You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**11. What we may need from you**

- We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**12. Time limit to respond**

- We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or if you have made a number of requests. In this case, we will notify you and keep you updated.