

1. Website privacy notice

This privacy notice outlines how Scottish Rail Holdings Limited (referred to as “SRH”, “we”, “us” or “our” in this privacy notice) collects, uses, stores and shares the personal information we collect about you in connection with your use of our website www.railholdings.scot, or when you contact us either via our website, email, telephone, post, social media or otherwise. This website is not intended for children and we do not knowingly collect personal information relating to children.

It is important that you read this privacy notice 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 notice supplements the other notices and is not intended to override them.

2. About us and how to contact us

We are Scottish Rail Holdings, an organisation controlled by Scottish Ministers. SRH is a “controller”. This means that we are responsible for deciding how we hold and use personal data about you. If you have any questions, comments or requests, including any requests to exercise your legal rights, regarding your personal information you can contact us at:

Scottish Rail Holdings Limited
3rd Floor, St. Vincent Plaza, 319 St Vincent St, Glasgow G2 5LD

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. Our DPO is Thorntons Law LLP, with the point of contact being Loretta Maxfield, Partner. Loretta can be contacted on dpo@railholdings.scot.

3. The types of personal data we hold about you

Personal data means any information about an individual from which that person can be identified either directly or indirectly. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** includes first name, last name, username or similar identifier, marital status, title,
- **Contact Data:** includes email address, social media handle and telephone numbers.

4. How we collect your personal data

We use different methods to collect personal data from and about you including through:

- Your interactions with us. You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email, social media or otherwise. This includes personal data you provide when you give us feedback or contact us.
- We do not use cookies or similar technology.

5. Purposes for which we will use your personal data and lawful basis

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so.

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 where this is required or permitted by law.

Purpose/Use	Type of data	Legal basis
To manage your enquiry or request and contact you in relation to this	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to manage, categorise and deal with enquiries and requests made through our website by post, email, social media, phone or otherwise and to manage our relationship with you) (b) Necessary to comply with a legal obligation (namely, our obligations under the Freedom of Information (Scotland) Act 2002 where a Freedom of Information request is made via our website)

6. How long we hold your personal information

We will only retain your personal information as long as is necessary to fulfil the purpose for which it was collected. We carry out manual reviews of the data we hold and will delete personal data when it fulfils the purpose for which it was collected.

7. Sharing your personal information

We may share your personal information where necessary 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.

WordPress – This website is provided by WordPress. When you provide personal data via the “Contact Us” page of our website – this is stored on the websites content management system.

8. Where we store your personal information

We do not anticipate transferring your personal data outside the UK.

If we need to transfer your personal data outside the UK for any reason (e.g. where a service provider or contractor hosts, processes, or stores information outside the UK) we will ensure that your data is afforded a similar degree of protection as it has within the UK:

- by ensuring the country to which the personal data is transferred has been deemed by the UK as providing an adequate level of protection for personal data; or
- by implementing contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement.

If you would like further information about how we safeguard your personal data, please contact us at – dpo@railholdings.scot

9. 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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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 put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. Your rights

You have certain rights under data protection legislation which can be exercised by writing to Scottish Rail Holdings, dpo@railholdings.scot, 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, though we may need to verify the accuracy of the new data you provide to us;
- **the right to request to have your personal information deleted** in certain specific circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- **the right to request the restriction of the processing** of your personal information in certain specific circumstances. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **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; and

- **where you have provided consent, to request to withdraw such consent at any time.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

There are some exceptions to the above rights that are permitted under the data protection legislation. We will explain any exceptions to the above should you exercise your right and the exceptions apply. If you wish to exercise any of the rights set out above, please contact us using the contact details provided at paragraph 2 above.

11. 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.

12. 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.

13. 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.

14. Complaints

You have the right to make a complaint about how we handle your personal data. Please direct any complaints to dpo@railholdings.scot in the first instance. We will acknowledge your complaint within 30 days. If we are not able to resolve your complaint to your satisfaction, you can complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues - [Make a complaint | ICO](#)

15. Changes to this privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in November 2025.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

16. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.