

Northern Debt Recovery and Prosecutions Unit - Privacy Policy

Last updated: 03/06/2020

Northern Trains Ltd ("We") are committed to protecting and respecting your privacy.

This policy (together with our [Website Terms and Conditions](#) and [Conditions of Travel](#)) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.northernrailway.co.uk/paymynotice or providing your information in the circumstances described below, you are accepting and consenting to the practices described in this policy.

In accordance with the Data Protection Act 2018 (the "Act"), the data controller is Northern Trains Ltd, and the data processors are PCI Telecoms Ltd, Raspberry Software Solutions Ltd, Carlisle Security Services Ltd.

Individuals are advised that when using the "Website" those pages with a web address prefixed by www.northernrailway.co.uk these pages are managed by Northern as the data controller, (a company registered in England and Wales with registration number **03076444** and registered to Albany House, Floor 8, 94-98 Petty France, London, SW1H 9EA.

Individuals who pay notices from Northern are advised that when using the "Pay My Notice" transactional pages prefixed by <https://www.pcitelecom.uk/northernrailway/> - these pages are managed by PCI Telecoms Ltd as Northern's data processor and processor of payments (a company registered in England and Wales with a registration number of **10310998** and registered to 35 Croft Road, Thame, Oxfordshire, OX9 3JF).

Individuals who provide personal information to Northern during fare dispute or enforcement action are advised that the electronic application used is managed by Raspberry Software Solutions Ltd as Northern's data processor (a company registered in England and Wales with a registration number of **07979037** and registered to 9 Deben Mill Business Centre, Old Maltings Approach, Melton, Woodbridge, Suffolk, IP12 1BL).

Individuals who provide personal information to Northern during fare disputes or enforcement action are advised that personnel inputting this data are managed by either Carlisle Security Services as Northern's data processor (a company registered in England and Wales with a registration number of **02654100** and registered to 800 The Boulevard, Capability Green, Luton, LU1 3BA),

References to "Northern", "Northern Railway" "we" "us" or "our" and they can also refer to our data processor PCI telecoms Ltd who process payments and information on our behalf, Raspberry Software Solutions Ltd who manage the electronic application, Carlisle Security Services who manage Loss Prevention Officers and Travel Safe Officers.

1. What personal data do we collect?

- **Information provided by you.** You may give us information about you by filling in forms on our site <https://www.pcitelecom.uk/northernrailway/> or by corresponding with us by phone, e-mail or otherwise. This includes information provided to our Loss Prevention Officers or Travel Safe Officers. The information you give us may include your name, address, e-mail address, phone number, date of birth, financial and credit card information, personal description, photograph, and geographical location.

- **Information we collect about you.** With regard to each of your visits to our sites we may automatically collect the following information:
 - Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform
 - Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our sites (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.
- **Sensitive personal data.** We will not intentionally or systematically seek to collect, store or otherwise use information about you classed as 'special categories of data' or 'sensitive data' (for example, information relating to any trade union membership, ethnic origin or health).

2. Cookies

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our sites. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy at [Cookie Policy](#).

3. How do we use your personal data and what is the legal basis for such processing?

The collection of the personal data described above is usually mandatory and, if such personal data is not provided, we will not be able to provide the information, products, and services to you. Where the collection of any personal data is not mandatory, we will inform you of this prior to collection, as well as the consequences of failing to provide the relevant personal data.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally process your personal information only:

- where we have your consent to do so;
- where the processing is necessary to perform our contract with you; or
- where the processing is in our legitimate interests or those of a third party and such interests are not overridden by your data protection interests or fundamental rights and freedoms; and
- where we have a legal obligation to process your personal information.

Information provided by you. We use your personal information as follows:

Purpose of processing	Legal basis for processing
Processing personal information in regard to a fare dispute	Compliance with Legal Obligation
Receiving payment in regard to a fare dispute	Compliance with Legal Obligation
Processing personal information in regard to Anti-social behaviour dispute	Compliance with Legal Obligation
Processing personal information in regard to a parking dispute	Compliance with Legal Obligation
Receiving payment in regard to a parking dispute	Compliance with Legal Obligation

Information we collect about you. We use your personal information as follows:

Purpose of processing	Legal basis for processing
Confirmation of details provided in the event of a fare dispute	Compliance with Legal Obligation
Confirmation of details provided in the event of an anti-social behaviour dispute	Compliance with Legal Obligation
Confirmation of details provided in the event of a parking dispute	Compliance with Legal Obligation

Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “Questions about this Privacy Notice” heading below.

4. Sharing Your Information

We may disclose your personal data to the following categories of recipient for the purposes described in this Privacy Notice:

- PCI Telecoms Ltd , payment of notices
- Raspberry Software Solutions Ltd, processing fare disputes
- Carlisle Security Services, processing fare disputes & anti-social behaviour disputes

We may also disclose your personal data to **any competent law enforcement body, regulator, government agency or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation; (ii) to exercise, establish or defend or legal rights; or (iii) to protect your vital interests or those of any other person;

We may also transfer your personal data to a **buyer or potential buyer (and its agents and advisers)** in connection with any reorganisation, restructuring, merger or sale, or other transferring of assets provided that we inform any receiving party it must use your personal information only for the purposes disclosed in this Privacy Notice.

We operate the Northern franchise under arrangements with the Secretary of State for Transport and the franchise operations may pass to a **successor operator**. We may disclose your personal data to the relevant franchising authority and/or any successor operator and any successor operator must use your personal information only for the purposes disclosed in this Privacy Notice.

Finally, we may disclose your data to any other person to whom you request us to make disclosure or if you consent to such disclosure.

5. Data Retention

We will not retain your personal data for longer than is necessary to fulfil the purposes for which we collected that personal information, unless the law permits or requires that we retain it for longer.

The table below explains in more detail how long Northern will store different types of customer information for:

Data Subject Information	
Failure to Purchase Notices, Unpaid Fare Notices, Penalty Fare Notice, Penalty Parking Notices, and reports for possible prosecution	For the duration of the processing of the Personal Data and up to 6 years thereafter
Name and address checking enquiries	Two (2) years
Passenger details (e.g., name, address of customer etc) (i) Prospective passengers (ii) Current passengers (iii) Lapsed passengers	6-12 months For the duration of the passenger's registration with the Customer and then for the period specified for lapsed passengers For a period of 6 years following the end of the year in which the passenger last purchased the Customer's services
Passenger data	For the duration of the passenger's registration with the Customer and then for a period of 6 years following the end of the year in which the passenger last purchased the Customer's services
Passenger consents to Customer terms and	For the duration of the processing of the

conditions	Personal Data and up to 6 years thereafter
Passenger service enquiries	3 years
Statistical reports/marketing data	Six (6) years
Register of complaints	Review after 10 years
Correspondence and papers including emails	Review after 6 years (or 10 years if the documents relate to a complaint or investigation)

6. Information Security

We apply appropriate administrative, technical, and organisational security measures to protect your personal data that is under our control from unauthorised access, collection, use, disclosure, copying, modification, or disposal. All information you provide to us is stored on secure servers. We provide routine training to our employees on our data privacy policies and procedures and permit authorised employees to access personal data on a need to know basis, as required for their role. We also take steps to ensure that any service provider that we engage to process personal data on our behalf takes appropriate technical and organisational measures to safeguard such personal data.

7. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical, or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

8. Your Data Protection Rights

You have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us at any time Northern Trains Ltd, Customer Experience Centre

Address: FREEPOST Northern Railway

Email: enquiries@northernrailway.co.uk

Phone: 0800 2006060

- In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us Northern Trains Limited Customer Experience Centre

Address: FREEPOST Northern Railway

Email: enquiries@northernrailway.co.uk

Phone: 0800 2006060

- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

9. Questions about this Privacy Notice

If you have any question, concerns or complaints about this Privacy notice or our handling of your personal data, you can contact us by email on dataprotection.officer@northernrailway.co.uk or by post to the following address:

Northern Trains Limited
Data Protection Officer
Northern IS
6th Floor
Northern House,
YORK
YO1 6HT

You can also lodge a complaint with your national supervisory Data Protection Authority. In the UK, the Data Protection Authority is the Information Commissioner's Office, contactable via the following details below.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number
Fax: 01625 524 510

The controller of your personal data is Northern.