



## PRIVACY NOTICE

### INTRODUCTION

Merseyrail is committed to protecting and respecting your privacy when you use our services.

This Privacy Policy explains:

- What personal data we collect from you when you use our website, apps, visit our stations, contact us, use our services, or WiFi;
- How we will collect and use that information;
- How we keep information secure; and
- How you can contact us if you wish to exercise any of your rights in relation to the information or make a complaint.

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**For the purposes of the EU GDPR (2016/679), the data controller is:**

Merseyrail Electrics (2002) Limited

9<sup>th</sup> Floor, Rail House

Lord Nelson Street

Liverpool

L1 1JF

**Our Data Protection Manager (DPM) is:**

Helen Hodgkinson  
9th Floor, Rail House  
Lord Nelson Street  
Liverpool  
L1 1JF

[Privacy@Merseyrail.org](mailto:Privacy@Merseyrail.org)

**Our nominated Data Protection Officer (DPO) is:**

Abellio  
134 Edmund Street,  
Birmingham  
B3 2ES

[dpoabellio@abellio.com](mailto:dpoabellio@abellio.com)

More information about the General Data Protection Regulation and all related and subordinate legislation as amended or re-enacted from time to time can be found on the Information Commissioners website <https://ico.org.uk/>

The Information Commissioner is our regulator for data protection matters.

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## **INFORMATION WE MAY COLLECT FROM YOU**

We may collect and process information about you when you:

- **Buy tickets**

When you purchase certain types of tickets at our stations (e.g. seasonal, monthly & weekly Railpasses, Corporate Railpasses), we'll ask you for certain data that enables us to issue you a ticket, and allow future renewals. This data will be processed by an external data processor, but remain secure and confidential at all time.

- **Travel on our services and visit our stations/ car parks**

For the safety and security of our passengers, we capture and monitor CCTV footage, as well as footage and audio captured by some body worn cameras. This data may be shared with the British Transport Police, our third party security partners, Network Rail or other train operators, but only where required.

- **Use our website and apps**

When you access our website or apps, we will capture anonymised data regarding your demographics and web usage. This data is available to Merseyrail, and can only be accessed by approved external developers for the purpose of website/app monitoring/improvement.

- **Access our station Wi-Fi**

When you access our complimentary Wi-Fi at underground stations on the network, we will capture only unique data identifiers that will allow us to automatically connect you in the future. This is held within a database managed by a third party with which Merseyrail has engaged under a formal contract.

- **Contact our Customer Relations function**

When you submit a complaint/question/ feedback, we will capture relevant, associated personal data. This data is held by Merseyrail, but may on occasions, be shared with official authorities or other train operators. Permission from you, the user, would always be sought in such an instance.

- **Enter a competition**

When you enter a competition or 'giveaway' on the Merseyrail website, we collect information that is necessary to contact you, or required to send any prize(s). This data is held by Merseyrail but is shared with an external website development agency with whom we have formally contracted to operate such promotional activities.

- **Sign up to receive updates or marketing**

When you sign up to receive marketing updates, whether it be via our online eNewsletter form, entering a competition with consent given for marketing updates, or consenting for updates via a Railpass application, we'll only retain data that is relevant to the type of communications we send to you. This data is held externally by an email client company.

- **Make payments online**

When you make a payment via our website we will only collect information necessary for the type of purchase you are making. Online payments are processed using an approved external data processor.

We may require additional personal details when you apply for some of our services (such as your age when applying for age-restricted tickets). This information is generally provided by you and in these scenarios, you retain the choice whether or not to take up the associated service or apply for the product.

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## **HOW WE USE YOUR INFORMATION**

We will only use the information you provide as permitted by Data Protection Law (DPL). Our reason(s) for using your data will vary depending on: how you contact us, use our services, the consent you have given, our legitimate interests, or any legal obligations we may have. Reasons for use of your data include:

- **To provide you with the service** - things like carrying out our obligations arising from any contracts - selling tickets, making and taking payments. We mostly rely on the legal ground of contractual performance to process your data, but sometimes the data is also used for our legitimate interests of customer service, health and safety, improving our services and other legal obligations, like providing information to our regulators;
- **To provide you with details of our services, information about travelling and customer service** - this is based on our legitimate interests, to run train and associated services. Sometimes it is part of our contract or our other legal obligations;
- **To provide you with details of promotions and offers** which we feel may interest you; this is based on our legitimate interests to try and sell more train tickets when you have given consent for us to contact you and you have an absolute right to ask us to stop sending marketing emails/SMS; and
- **To run our services and improve them** - we believe in investing in our railway services, not just to benefit passengers but also the wider community, environment, and economy. There are lots of activities we do to achieve this, some are administrative and we also do things like monitoring passenger numbers, and popular stations, improving technology to help plan journeys - make money, run our services safely and be a good employer - we call these our legitimate interests. Some of these are also covered in our legal obligations, not just to customers, but under Franchise Contracts/Local Authority Contracts, the Department for Transport or Regulators. Some data is also shared to run interoperable services – in the Rail Industry this is overseen by the Rail Delivery Group - this is how you are able to use a ticket on a train and tube for example, or use a rail Discount card.

We are part of a Group of Companies and share administrative services and support. Your data may therefore be shared with other Group companies where appropriate in accordance with our legitimate business interests. We are also required to pass certain customer data to successor franchisees/concessionaires, Merseytravel, Secretary of State or Department for Transport.

**Our Legitimate Interests** comprise:

- Running our business and Group businesses, efficiently and in a safe and socially and environmentally responsible manner;
- Providing a sustainable and high quality, locally focused passenger transport services;
- Improving and expanding the services we offer and our levels of customer service;
- Acting as a leading employer in the transport sector, investing in and developing our staff;
- Taking appropriate steps to help ensure the safety, security and well-being of our customers, employees, suppliers and any other relevant third parties;
- Operating with financial discipline, reducing economic crime and providing maximum shareholder value.

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## SHARING OR DISCLOSURE OF YOUR INFORMATION

We will only share or disclose your information as set out in this Policy or in accordance with DPL and will obtain your consent where we are required to do so. We will only use third parties to process information where we are satisfied that they comply with these standards and can keep your data secure.

Due to the nature of the services we provide, we process a large range of data, in a manner of ways, across a number of solutions. Accordingly, it was deemed impractical to set out the details of all the third parties that we may share your data with below. You can find out more about the information we collect and how we use, share or disclose it below or by contacting us at [Privacy@Merseyrail.org](mailto:Privacy@Merseyrail.org).

We may share or disclose information for the following reasons:

- We use data processors to provide or assist with some of our services, for example, the capture of eNewsletter sign ups. Where we do so, they must agree to strict contractual terms and to keep your data secure;
- Where we share data across our Group Companies, this is only in accordance with a written data sharing agreement;
- To operate interoperable services - this includes use of some shared systems and processors, by the rail industry generally and overseen by the Rail Delivery Group;
- To respond to your complaints or administer requests you have made, either to us or another regulatory body such as the Department for Transport; Transport Focus, the Rail Complaints Ombudsman or other Train Operating Companies (TOCs);
- To process payment card transactions, including those made online
- To comply with requests from the British Transport Police under an Information Sharing Protocol, ensuring that any disclosure is lawful;
- To comply with the police or other law enforcement agencies for the purposes of crime prevention or detection, these are dealt with on a case-by-case basis, under a specific Information Sharing Protocol, to ensure that any disclosure is lawful;
- To comply with other legal obligations for example, relating to crime and taxation purposes or regulatory activity;
- To protect our legitimate business interests, as outlined above;
- Where required because of the sale, merger, or acquisition of business assets. As the Railway Industry is run on a system of franchises, we are required to transfer our customer data to a successor franchise, or the Secretary of State, this is so that they can take over and continue the running of the railway service;
- In respect of information provided to us for marketing purposes only (including freely given consent), to the Department for Transport and/or any successor operator of the rail franchise in order that they may contact you for marketing purposes in the event that we cease to operate this rail franchise;

- If you have agreed (via freely given consent) to receive information for competition, promotion, survey or research purposes, we may share your contact details with a limited number of parties, but only for the reasons you have agreed to in the terms and conditions of the purpose; and
- Where you have consented, to share with other members of our corporate owning groups in respect of any services, promotions and offers which we feel may interest you. Details of other members of Abellio can be found [here](#), and further information regarding Serco's various divisions and operations can be found here – [Serco Group](#) and [Serco UK & Europe](#).

## **TYPES OF INFORMATION WE COLLECT**

### **CCTV**

#### ***Camera systems we operate***

Our CCTV is used to capture, record and monitor images of what takes place at our stations and car parks and on our trains, in real time. In limited circumstances, we use body worn cameras which make audio visual recordings.

Depending on the type of camera, images are recorded on video tape (analogue) or as digital information. Cameras can be fixed or set to scan an area. In some circumstances, they can be operated remotely by controllers.

#### ***Why we operate CCTV cameras***

We operate CCTV for the following purposes:

- Health and safety of employees, passengers and other members of the public;
- Crowd management; and
- Prevention and detection of crime and anti-social behaviour;
  - To assist in the deterrence and prevention of crime/terrorist activity
  - To assist in the monitoring and detection of crime/terrorist activity
  - To assist the emergency services
  - To investigate staff, public, contractor and operational accidents and incidents
  - To assist in the provision of evidence in criminal and civil proceedings
  - To enhance the perception of personal safety for ME staff & its travelling public and encourage greater use of public transport
  - To meet all statutory requirements and obligations
  - Crowd control & monitoring
  - Vehicular access & egress from stations
  - Support on train movement, particularly following disruption, including contingency management (i.e. following the unlikely event of terrorist activity taking place)

### ***Camera locations***

We operate cameras at all of the stations and car parks we manage, and on all of the trains that we run. We have cameras at all of our stations and car parks across the network. Details of all of our stations and car parks can be found [here](#).

Network Rail operate the cameras at our underground stations, and another train operating company operate the cameras at Chester station.

### ***Length of time CCTV footage is kept***

CCTV footage at stations is generally held for a **maximum** of 31 days from the time of recording.

Recordings from body worn cameras is generally held for 31 days, unless required for legitimate business reasons.

CCTV footage from our trains is kept for a **maximum** of 7 days.

Where CCTV footage is required to assist with the investigation of an accident, allegations of criminal activity or our other legitimate business purposes it will be downloaded and securely stored in line with our retention policy.

### ***How to access your CCTV personal data***

You can request copies of images or footage of yourself by making a Subject Access Request.

### ***Disclosing CCTV/personal data to the police***

At our discretion, we may disclose CCTV/personal data in response to valid requests from the police and other statutory law enforcement agencies.

Before we authorise any disclosure, the police have to demonstrate that the CCTV/personal data is necessary to assist them in the prevention or detection of a specific crime, or in the apprehension or prosecution of an offender.

Requests from the police are dealt with on a case-by-case basis to ensure that any such disclosure is lawful in accordance with the DPL.

### ***Sharing CCTV footage with other third parties***

In certain agreed circumstances, Network Rail may take control of our cameras and use them for activities such as the prevention and detection of crime and anti-social behaviour, policing major events and crowd control. Merseyrail is not responsible for the CCTV when it is in the control of a Network Rail.

We may also disclose personal data to third parties, if required to by law or it is necessary for a legitimate purpose such as defending or bringing legal action. DPL allows us to do this where the request is supported by:

- evidence of the relevant legislation

- a court order
- satisfactory evidence and assurances of the legitimate interest.

Legitimate interest would include requests such as defending or making a legal claim, such as to insurers following a vehicle collision in a carpark. When we are not required to provide CCTV, we will take into account the circumstances and any potential harm to individuals, we may also charge a fee and seek indemnity for any use beyond which it is requested.

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## **WEBSITE VISITS**

This section shows the information we collect when you use our website. Before providing us with your details, please read the following important information regarding:

- Collection of visitor information;
- Hyperlinks;
- Cookies; and
- Session Cookies.
- Other storage technologies.

### ***Collection of visitor information***

We will only use the information that we collect about you lawfully, in accordance with the DPL.

The details you provide about yourself and any other information which identifies you ('Personal Information') is held by Merseyrail on this website (the "Site") for operational purposes, for example member registration or processing payments.

Merseyrail gathers general information about users, for example, what services users access the most and which areas of the Merseyrail site are most frequently visited. Such data is used in the aggregate to help us to understand how the Merseyrail site is used. We gather this information so that we can continue to improve and develop our services to the benefit of our users. We may make this aggregated information available to users of the Merseyrail site and to auditors. These statistics are anonymous and contain no personal information and cannot be used to gather such information.

When you sign up with Merseyrail, set up a travel alert or enter a competition, we ask for personal information such as your name, contact details, and other details. Once you register with Merseyrail and accept our Terms & Conditions, you are not anonymous to us. We may use information that you provide to alert you to our own products and services. We may contact you regarding site changes or changes to the Merseyrail products or services that you use.

You may opt-in to receive newsletters, special offers and other marketing emails from Merseyrail. You may unsubscribe at any time by clicking the relevant unsubscribe link in the footer of any Merseyrail email. Please note changes to your subscription preferences can take up to 14 days to take effect.



Alternatively write to our Customer Relations Team:

Merseyrail, 9th Floor Rail House,  
Lord Nelson Street,  
Liverpool,  
L1 1JF

### ***Hyperlinks***

We may provide hyperlinks from the site to third party websites. No liability is accepted for the contents of any site operated by a third party which may be accessed via links from the site. These links are provided for your convenience only and do not imply that Merseyrail approves or recommends the content of such sites. We encourage our users to be aware when they leave our site to read the privacy statements of each and every website that collects personal data. This Privacy Policy applies solely to information collected by Merseyrail.

### ***Cookies***

Our website uses cookies to help us to provide you with a good experience when you browse our website and also allows us to improve our website.

#### **So what is a cookie?**

A "cookie" is a small text file that is placed on your equipment when you visit a website (equipment like computer, phone, tablet).

There are several types of cookies:

#### **Functional cookies**

The functional or session cookies are used to provide services or to store your preferred settings. For example for:

1. remembering the products you purchase during online shopping;
2. memorizing and passing on the information that you enter during the log-in process or that you leave behind on the various web pages during the ordering process, so that you do not have to enter the same data every time;
3. saving your preferences; and
4. detecting abuse of our websites.

#### **Analytical cookies**

These cookies are used to analyze your visit to our websites. For example, we analyze the number of visitors visiting our websites, the duration of the visits, the order of the pages visited and whether the pages of a website need to be adjusted. With the help of the collected information we can organize our websites more user-friendly. Furthermore, these cookies are used to solve possible technical problems on the websites.



### **Marketing and tracking cookies**

Merseyrail does not currently use any cookies for marketing and tracking purposes.

### **Other techniques**

In addition to cookies, Merseyrail also uses Javascripts and web beacons. By using Javascript in your browser we can make our sites interactive and develop applications for the web. A web beacon is a small graphic image on our sites. By means of this image, we can, for example, determine how many visitors saw the page at which times. These techniques can also be used for marketing and tracking purposes.

### **Cookies from external parties**

Some of the cookies are placed with the consent of Merseyrail by third parties with the aim of following our analytical trends or giving you direct access to social media.

For the cookies that such external parties place, the information they collect with them and the purpose for which that information is used, we refer to the privacy statements of these parties on their own websites. These statements can change regularly and Merseyrail has no control whatsoever.

Would you like to know more about cookies? Then go to <http://www.allaboutcookies.org/>

An overview of the cookies & similar techniques that we use can be below:

Name	Details	Expiry
station_origin	This cookie is used to store the origin station that visitors select when journey planning. This information is then used when the user loads the journey planner at any other subsequent times.	365 days
station_destination	This cookie is used to store the destination station that visitors select when journey planning. This information is then used when the user loads the journey planner any other subsequent times.	365 days
_ga _gat	<b>Google Analytics</b> Google Analytics uses these cookies to record the number of unique visitors to our site and the frequency of views each web page obtains.	2 years 10 minutes
_atuvc _atuv bkdc bku ck di2 dt loc NID pt sess uid um uvc vc xtc	<b>AddThis</b> AddThis is a third party service that allows users to share content on a social network. The cookies are used to display the icons on some of the web pages around the Merseyrail website. For more information please see <a href="http://www.addthis.com/privacy/opt-out">http://www.addthis.com/privacy/opt-out</a>	2 years 1 day 6 months 6 months End of session 2 years 1 month 2 years 6 months End of session 1 day 2 years 2 years 2 years 2 years 2 years
Mando.Clients. Merseyrail. DestinationPlanner.	This cookie stores the users unique Id for the their Destination Merseyside planner.	2 days
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## **TICKET OFFICE PURCHASES – SEASON TICKET RECORDS**

### ***Personal details we hold***

When you buy a season ticket valid for one week or more, we keep a record of this on a database. We keep the following details:

- Name, address and photo card number;
- Phone number, email and date of birth if you provide them;
- The origin, destination and start and end date of season tickets you have purchased, along with any duplicate, replacement or refund of these; and
- The method of payment used, but not any payment card details.

### ***How we use your personal data***

We use this information for Contractual obligations, Customer Relations and administration, customer research, marketing and fraud prevention.

We will only send you information about offers and promotions if you chose to receive it and you can change your marketing preferences at any time. We will not pass your personal information to any other organisation outside of our Group of Companies (and Successor franchise or Secretary of State for Transport) for marketing purposes without your prior consent.

### ***Why we retain your information***

We retain your information to keep you informed with any changes to your relevant product that may personally effect you.

### ***Length of time records are kept***

Records are kept indefinitely.

### ***Sharing data with third parties***

If you have agreed to receive information for survey or research purposes, we may share your contact details with a limited number of parties, but only for the reasons you have agreed to.

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## **REVENUE PROTECTION AND PENALTY FARES**

### ***Personal details we hold***

We may collect a range of personal information during revenue protection activity. This may include name, address, proof of ID, journey details, payment details, personal descriptions and other information you must provide upon request as stipulated under the Railways Regulations Act and The Railways (Penalty Fares) Regulations 2018.

### ***How we use your personal data***

We only use this information for the administration of the Penalty Fares scheme, collection of unpaid fares, fraud prevention and the prosecution of travel offences.

### ***Why we retain your information***

We retain your information for revenue protection activity and purpose.

### ***Length of time records are kept***

Personal information is retained for as long as is necessary for revenue protection activity and purpose. We continually review the length of time we retain personal information and securely delete records that are no longer required for revenue protection activity or purpose.

### ***Sharing data with third parties***

We may share your correspondence with:

- British Transport Police under a data sharing agreement to prevent and detect crime.
- The Independent Penalty Fares Appeal Body if you appeal a Penalty Notice issued to you.
- Transport Focus if you have asked them to act on your behalf under a complaint handling procedure. Requests from ombudsmen are dealt with on a case-by-case basis to ensure that any such disclosure is lawful in accordance with DPL.
- We may also share information with other TOCs for fraud prevention. We will only do this where there is a formal data sharing agreement in place, or where an ad hoc request is received this will be dealt with on a case-by-case basis to ensure that any such disclosure is lawful in accordance with DPL.

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## **CUSTOMER RELATIONS DATABASE**



We collect your information and comments when you contact us by letter, email, web form, phone or social media.

***Personal details we hold***

We may hold your name, address, date of birth, email address, phone number, social media name, ticket details, photo-card image, our correspondence with you, the compensation claims you have made and payment made by us (including bank transfer records), proof of journey or other supporting information you may provide.

To ensure that we have an accurate record of dealings between us (and for training purposes) we may, in certain circumstances, record or monitor inbound telephone calls, however you will always be told when this happens.

***How we use your personal data***

This information is used for administration of correspondence or processing claims you have made, such as for fraud prevention purposes. We also use it to respond to complaints.

***Why we retain your information***

We retain your information to ensure historical records of previous complaints/claims are available to refer back to wherever necessary.

***Length of time records are kept***

Records are kept for a maximum of 7 years.

***Sharing data with third parties***

We are required to provide details of your complaint to another TOC if it relates to their services instead of ours. We may share your correspondence with Transport Focus or the Ombudsman, if you have asked them to act on your behalf under a complaint handling procedure. In this case, we will ensure an individual's permission is obtained before sharing any personal data.

We may also share information with other TOCs for the purpose of fraud prevention. We will only do this where there is a formal data sharing agreement in place, or where an ad hoc request is received this will be dealt with on a case-by-case basis to ensure that any such disclosure is lawful in accordance with DPL.

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**STATION HELP AND ASSISTANCE INFORMATION POINTS**

At our stations, we maintain Customer Help and Assistance Points. Depending on the service requested these are linked directly to our Control Centre or to National Rail Enquiries.

Calls for Information or Assistance made to National Rail Enquiries are recorded and monitored, but no advance notice is given as this could result in a delay in the providing



assistance. All recorded data is kept by National Rail Enquiries and Network Rail respectively.

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## **CHILDREN'S DATA**

We do not routinely process children's data, however in the rare instances that we do we may be required to gain consent from a parent or guardian to process the child's data.

Where we chose to rely on consent as the legal basis for processing children's personal data, consent may be required from a person holding 'parental responsibility' (note that under the GDPR the UK could chose to implement a lower age boundary than 16 in defining a "child" in law, as long as it is not below 13).

The children's consent must be freely given, specific, informed and unambiguous.

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## **WHERE WE STORE YOUR PERSONAL INFORMATION**

The information that we collect from you will only be stored in the European Economic Area ("EEA") or, where it is necessary to disclose it to our processors located outside the EEA, other jurisdictions which are acceptable according to guidance provided by the Information Commissioner and/or where appropriate legal and security safeguards are in place. Please contact our Data Protection Manager (see Page 2 for details) if you wish to find out more about the safeguards.

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## **INFORMATION SECURITY**

We use a range of appropriate technical and organisational measures to safeguard access to and use of, your personal information and to ensure it retains its integrity and availability. These include structured access controls to systems, network protection, intrusion detection, physical access controls and staff training. We also consider anonymising or pseudonymising personal data where practical.

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## **YOUR RIGHTS**

Unless stated otherwise, we will aim to satisfy your instruction, or inform you as to why we are unable to, without undue delay and within 1 month of receiving your requests. If we anticipate that we will not meet with this timeframe we will let you know within 1 month and explain what the problem is.

If you wish to take up any of your rights as set out below, please contact our Customer Relations department on 0151 555 1111 or our Data Protection Manager (as detailed on Page 2).

## **RIGHT TO OBJECT TO DIRECT MARKETING**

To prevent marketing to you, you have the right to ask us not to process your personal information for marketing purposes. We will usually inform you before collecting your



information if we intend to use or disclose it for such purposes. If you do not want us to use your information for marketing purposes either:

- indicate this by NOT ticking the box to be sent marketing emails (or offers);
- click the unsubscribe link on direct marketing emails; or
- contact us as above.

## **RIGHT TO BE INFORMED AND RIGHT OF ACCESS**

You have the right to be told what information we hold about you. You are also able to request a copy of your personal information. We may need to ask for some further information, such as checking who you are. Please let us know in what format you wish to receive your information.

You can download our Data Subject Access Request Form here: [Variant B](#) (for law enforcement agencies) or [Variant A](#) (for all other applications). You should then print, complete and return the relevant form to us at the address provided on the form. This will help us deal with your request more efficiently. Alternatively, you may contact us as above.

Sometimes we may hold information that we don't have to provide, for example it would prejudice a police investigation or if the disclosure would cause harm to another person whose personal data is inseparable from your data.

In most cases we provide the copy of your data to you for free, although you may be charged in some instances. Please see '**HOW WE DEAL WITH RIGHTS REQUESTS**' below for further detail.

## **RIGHT OF RECTIFICATION and RIGHT OF RESTRICTION**

If you believe the information we hold about you is inaccurate or incomplete you can contact us and ask us to correct it. You may also request any data processing we are carrying out on your data is halted whilst a request for rectification, objection or a dispute over the lawfulness of processing is being considered. We will provide a response confirming the action we have taken or disagree with taking.

## **RIGHT OF ERASURE**

This is also known as the “Right to be forgotten”, you can request deletion or removal of personal information in some circumstances, such as where there is no compelling reason for its continued processing. We will also take reasonable steps to notify third parties of your instruction and request that they act upon it, in a similar manner.

## **WITHDRAWAL OF CONSENT**

If we relied on consent as the ground for processing your personal data, you can withdraw this consent at any time. It does not affect the processing carried out beforehand. You can withdraw consent by contacting Customer Relations on 0151 555 1111 or our Data Protection Manager (as detailed on Page 2).

Where you have consented to receive direct marketing communications, you can withdraw your agreement at any time, as above or by clicking on the appropriate link in any Merseyrail email.

We will act upon such an instruction as soon as possible.

## **AUTOMATED DECISION MAKING**

The GDPR sets out several obligations and restrictions in respect of any automated decision making. However, Merseyrail does not conduct any automated decision-making activities.

## **PORTABILITY**

Where you have provided us with personal data and the reasons we are processing it are based on consent or our contract with you, and the processing is automated, you have a right to ask for that information be provided to you or another data controller in a structured, commonly used and machine-readable format. The right may be restricted if it is not practical for us to provide the information in this way or it adversely affects the rights of others.

## **HOW WE DEAL WITH RIGHTS REQUESTS**

We are not able to charge you a fee for dealing with rights requests, unless they are manifestly unfounded or excessive or in circumstances where copies have been provided previously. We would always let you know if we thought this was the case, so that you can make a decision about what you wanted to do next.

There are various limitations and exemptions in relation to the exercise of rights in DPL - for example if it would affect another’s rights and freedoms or if we need to retain the information to make or defend a legal claim. We intend only to rely on limitations and exemptions where it is fair to do so and always bearing in mind that it is your personal data.



## COMPLAINTS

If you are not happy with the way in which we deal with your data or have dealt with a rights request, then please us know. Our Data Protection Manager role has been established in a manner to remain independent of business decisions, and is the first point of contact for dealing with Rights Requests and complaints.

Our Data Protection Manager (DPM) is:

Helen Hodgkinson

8th Floor, Rail House

Lord Nelson Street

Liverpool

L1 1JF

[privacy@merseyrail.org](mailto:privacy@merseyrail.org)

If you are not satisfied with the way in which our DPM has handled your complaint or rights request then you can contact our Group Data Protection Officer:

Data Protection Officer

Abellio

134 Edmund Street,

Birmingham

B3 2ES

[dpoabellio@Abellio.com](mailto:dpoabellio@Abellio.com)

If you are not satisfied with our DPO's response you can complain to the ICO. Their contact details are:

Head office

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

<https://ico.org.uk/global/contact-us/>



## **HOW LONG WE KEEP YOUR PERSONAL DATA FOR?**

We'll store your information for as long as we have to by law or regulatory requirement. If there's no legal or regulatory requirement, we'll only store it for as long as we need it, in line with our data retention policy.

We'll also keep some personal information for a reasonable period after your last contact with us – just in case you decide to use our services again. We, or one of our partners, may contact you about our services during this time if you haven't opted out of receiving marketing communications from us.

We may also keep your personal data for the purposes of our legitimate interests in running our Group businesses, including anonymising or pseudonymising data for analysis.

## **CHANGES TO THIS PRIVACY POLICY**

We may revise this Privacy Policy from time to time. The most current version of this policy will govern the use of your information and will always be at [www.merseyrail.org/privacy](http://www.merseyrail.org/privacy). By continuing to access or use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.

This Policy was last updated on 14th November 2019.