

Alpha Rail – GDPR Compliance Statement

UPDATED – MAY 2021

Introduction

The **EU General Data Protection Regulation (“GDPR”)** came into force across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. This document will highlight our efforts to be GDPR compliant and how we are committed to the proper handling of any personal data we hold. This statement summarises our preparation and objectives for complete GDPR compliance.

Commitment

At Alpha Rail, we are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. While this has always been the case, and data protection has always been a priority, we recognise and understand the newly introduced demands that come with the new GDPR. We are dedicated to safeguarding any data we may hold and aim to demonstrate this as much as possible across the company. Our preparation and objectives for GDPR compliance have been summarised in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

How Alpha Rail is preparing for the GDPR

Although Alpha Rail already has a sophisticated level of data protection and security across the company. We outlined below how we have prepared for full GDPR compliance.

- **Information Audit** – a company-wide audit that enables us to identify what personal information we hold. We assess how the data is obtained, why it is stored and who has access to this data.
- **Privacy Policy** – we have revised our Privacy Policy to comply with the GDPR, ensuring that any individual whose information we process are fully aware of why we keep it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
- **Direct Marketing** – we have revised our processes for direct marketing, namely our contact forms, to include clear opt-in mechanisms for marketing related emails as well as a clear notice and method to opt out, providing an option to unsubscribe from our direct marketing activities at any given time.
- **Consent** – we have revised our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. We have developed stringent

processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time. If we feel that you would genuinely benefit from receiving our marketing material, we may contact you on an “implied consent” basis – however, you have the right to object to this processing and we will clarify that you have been contacted on this basis, presenting you with a clear method to opt out.

- **Legal Basis for Processing** – we reviewed all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.
- **Policies & Procedures** – we updated our data protection policies and procedures to meet the GDPR requirements and any other data protection guidelines, including:
 - **Data Protection** – our main policy and procedure document for data protection has been overhauled to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on privacy by design and the rights of individuals.
 - **Data Retention & Erasure** – we have updated our retention policy and schedule to ensure that we meet the ‘*data minimisation*’ and ‘*storage limitation*’ principles and that personal information is stored, archived and destroyed compliantly and ethically. We have dedicated erasure procedures in place to meet the new ‘*Right to Erasure*’ obligation and are aware of when this and other data subject’s rights apply; along with any exemptions, response timeframes and notification responsibilities.
 - **Data Breaches** – our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.

Information Security & Technical and Organisational Measures

Alpha Rail takes the privacy and security of individuals and their personal information very seriously, and as such will take every reasonable measure and precaution to protect and secure the personal data that we process. We have information security policies and procedures in place to protect personal information from unauthorized access, alteration, disclosure or destruction and take several security measures, including:

- **Secure internal network**
- **Access controls**
- **Password policy**
- **Authorisation and authentication to access information**

What information do we keep about you?

We collect personal information when you:

- **Fill out a contact form on our website**

- **Subscribe to our newsletter**
- **Submit a callback request**
- **Contact us via phone or email**
- **Follow our Social Media channels**
- **Use our Live Chat system**

What kind of information does this include?

The kind of information collected will vary depending on the method used to interact with Alpha Rail on our website. The information is necessary to enable us to contact you if we have prepared a quotation or you have placed an order with ourselves. We also use this information to optimize our website for the best and smoothest possible user experience. The information we collect can include:

- **First & last name**
- **Phone number**
- **Delivery address / postcode**
- **Company name**
- **Email address**
- **IP address (live chat)**
- **Approximate location (live chat)**
- **Browser and device (live chat)**
- **Google Analytics data to improve user experience (time spent on pages, how you moved around the site, what content you interacted with the most etc.)**

GDPR Roles and Employees within Alpha Rail

Alpha Rail have designated Sales Director **Phil Ball** as our Data Protection Officer, as well as appointed an in-house team to monitor our compliance objectives and make sure they continue to be met. They are responsible for promoting awareness of GDPR within the organization, identifying any areas for improvement and implementing any new policies, practices or measures. Continuous employee awareness is crucial to the continued compliance of the GDPR and brought to our employees' attention the importance of the GDPR and our commitment to comply with the newly introduced guidelines.

If you have any questions about our preparation for the GDPR, please email websales@alpharail.co.uk.

Credit

Where customers are looking to open a credit account with Alpha Rail, we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at <http://www.experian.co.uk/crain/index.html>