

Policy Title: Privacy Policy

Policy Ref: PRB POL 013

Author: R Bell

Date: January 2020

Version: V3.0



Privacy Policy

Who we are and what do we do

We are PRB Health and Safety Training Limited, and we trade as PRB Consulting. We are consultants within the rail business sector, providing rail suppliers with specialist health and safety support, access planning and assessments. We help you maintain compliance with the rules, regulations and legislation.

Your Personal Data and our promises to you

We know that your personal data, and who you share it with, is very important. So, we're committed to four privacy promises to keep your data safe and secure –

- We'll be absolutely clear about the personal data we hold, how we use it and more importantly, why we need it.
- We will only use your personal data where we genuinely need to
- We will keep your personal data secure, using the best possible technology, people and processes.
- We want you to be able to make real, informed choices about your personal data

Whenever you use our services, either on our website or app, we'll look after your personal data in the way we've set out in this Privacy Policy and in line with our promises to you (above).

The Personal Data you share with us

You may need to actively provide us with your personal data to use our services, we've explained this in more detail in our table below.

- At a glance, when we say "personal data", we're talking about things like your name, email address, payment card details, billing address, phone number and the details of RISQS Data held on other servers that we access on your behalf.
- You may also provide us with other personal or business data to allow us to meet our services or contract obligations to you. By providing this information you confirm you have the holder's permission to give it first.

Personal Data type	Why we need it	Legal Basis	Who we share it with
Payment Info	To set up direct debits To take card payments for services	We need this to offer our services to you	Our merchant banker (WorldPay) to allow us to process the payment
Payment card details and the address the card is registered to.			

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<p>Contact details – Name, email address, phone number.</p>	<p>To contact you with specific information relating to the services we offer. We will send you relevant information relating to the contract with you – bulletins, standards reviews, etc. These will be inline with our Service Level Agreement (SLA)</p>	<p>We need this info to offer these services to you, it's part of our contract with you.</p>	<p>No one at all, this information is held internally and only used for business purposes by authorised staff.</p>
	<p>We may send you marketing emails, letting you know about our or industry news and offers</p>	<p>Legitimate interests. Put simply, that's the necessary use of your data (balanced with your rights) in order for us to provide services to you.</p>	
	<p>We may carry out surveys and market research activities (to improve our service for you), send you notifications, and involve you in our competitions and promotions.</p>	<p>We want to send you these types of marketing messages to give you the best service we can. We'll only send you relevant messages and you can choose not to hear from us at any time.</p>	
<p>Comment details – Name, email address and unique identifiers as required, and any comments you choose to give us.</p>	<p>If you choose to give us feedback (and please do, our ears are always open), we'll use your comments, combined with others, at an overview level, to improve our products and services.</p>	<p>Your consent. It's your choice to give us this info and you also decide how much detail you want to share.</p>	<p>We do not routinely share this type of data. We use carefully selected third parties to carry out this task, on our behalf.</p>
<p>Contacts from you and questions you've asked us – Name, email address and any generated contacts, including calls.</p>	<p>When you email us or use our chat option to get in touch with us, we use this info to help us provide our services to you. If you call us we may record your phone call to help our Customer Service and Operations teams fix any issues you've raised, as well as for training and</p>	<p>Your consent. You choose how and when you want to contact us.</p>	<p>We don't routinely share this type of data.</p>

	quality purposes.		
Fraud prevention info – Name, legitimate contact info and unique identifiers as required and relevant device info.	To make sure neither you nor we are harmed by a scam.	Legitimate interests. Put simply, that’s the necessary use of your data (balanced with your rights) in order for us to provide services to you.	We work with third-party fraud prevention providers (try saying that three times quickly) to put a stop to any fake payments. Sometimes the fraud-prevention tools used are automated. Your personal data will be automatically checked when you pay (using a set of clever rules), to make sure there’s nothing phishy going on. Because of this, there may be times when you might not be able to pay with a particular card or method, or we may not be able to take your booking. If you’re worried about your payment being declined, please contact us - see our contact details below.

We also collect a limited amount of personal data from you, automatically, whenever you visit our website. It’s nothing to worry about, in fact, we do this to give you a better and more personalised experience. Cookies and your IP address are the sorts of tech we use to understand you better, as well as looking at how you use our website.

Personal data type	Why we use it	Legal basis	Who we share it with
Analytics info – We use info about the searches and booking you make - basically how you use and navigate through our website	To understand how you use our website, to help us improve it and make it relevant to your interests. Don’t worry – we aren’t trying to identify you individually – we only use high-level	Legitimate interests. Put simply, that’s the necessary use of your data (balanced with your rights) in order for us to provide services to you.	We don’t routinely share this type of data but we use carefully selected third parties to help us carry out this task.

	overview data to understand what our customers are interested in.		
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As well as in the above situations, we also need to share your personal data with the following third parties –

Service providers

- We work with carefully selected third-party service providers to carry out many of the activities listed above. But don't worry, we always give these service providers clear instructions to keep your personal data safe and sound. For example, we've made it crystal clear to these service providers that they can't use your personal data for anything other than the specific service in question. And, we only give them the parts of your personal data that they actually need.

The authorities

- Sometimes, for legal reasons, we have to share parts of your personal data with police or regulatory authorities, or government and law enforcement agencies. Generally, it's to help them prevent fraud and crime. When we do give this data to the authorities, it's over to them to protect your info. Don't worry, we only share what's absolutely necessary.

Keeping Your Data

- While you're using our services, your personal data will be safe with us, but we'll never keep it for longer than we need to.
- If the time comes when we don't need your personal data to offer our full services to you, we'll make sure it's either completely deleted or anonymised.

Cookies

Our easy-to-use website and app is made so handy because we use cookies.

Cookies are what we call the tiny crumbs of personal data that we automatically collect whenever you visit our website. Our Cookies Policy gives a full breakdown of how we use cookies, and how you can adjust your preferences through your browser settings.

Personalising Your Experience with Us

It's so much nicer when people remember your name and say, "Morning Tom", instead of just "Morning", right? Or, when the server in your local coffee shop sees you walk in for your daily caffeine fix and says, "One mocha light Frappuccino coming right up, Susie." without you needing to say anything. It makes you feel cared about.

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That's exactly how we want you to feel whenever you visit our website or interact with us in anyway. So, we rely on things like cookies and your IP address to give you a more personalised experience (unless, of course, you've indicated through your browser settings that you'd prefer it if we didn't).

So, we use this information to give you the best-possible, tailored experience when using our services

Security

- We take the security of your personal data very seriously.
- We use a whole bunch of clever security measures (physical, electronic and administrative) to protect the info that we collect about you from anyone who shouldn't have it. The measures we put in place protect you from any unlawful processing of your data, as well as accidental loss, destruction and damage.

Your Rights

Here's where we cover the lowdown on what you need to know. We'll happily take requests from you if you want to exercise your individual rights over your personal data. These rights are –

- To be told about how your data is processed
- To access your data
- To stop or restrict certain processes
- To correct incorrect info
- To ask us to delete certain info
- To port data (porting is just a fancy way to say “transferring data to another data controller in an easy-to-read manner”)
- To access info about profiling or automated decision making
- To object to how we're handling your personal data.
- To withdraw your consent at any time (in cases where we rely on your consent).

Because we know how important your personal data is to you, we do everything we can to respond to information requests from you in a timely fashion. Legally though, we have up to one calendar month from the date we get your request to reply to you (this deadline may be extended for very complex or large requests), as long as –

- You've given us any info we need to confirm your identity and given us clarity about the relevant personal data you're requesting.
- We've not already responded to an identical or similar request within a very short timeframe.

Please bear in mind that if/when we get a request from you, we'll need to balance your rights with the rules we have around processing your personal data. For legal reasons, we need to stick to the rules. If we can't deal with your request, either in full or in part, we'll explain our reasons clearly.

If you're not happy about the way your personal data's been handled, you have the right to contact the Information Commissioner's Office (www.ico.org.uk/concerns)

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Changes to our Privacy Policy

We like to stay on top of things, so the way we use your info may change. If it does, we'll update our Privacy Policy. You can see the date we last updated it right at the very top. If there's a significant change, we will notify you.

Contact Us

If you've got any questions that haven't been covered, please contact our Data Protection Officer. Email us at DPO@prb-consulting.co.uk or write to us at; Data Protection Officer, Townhouse, Market Street, Hailsham, East Sussex. BN27 2AE

Richard Bell



Managing Director
January 2020