



National Transport Trust

Preserving the past for the future

Old Bank House, 26 Station Approach
Hinchley Wood, Esher KT10 0SR

Data Protection Policy

Definitions

- “The Trust” is the National Transport Trust, a registered charitable incorporated organisation (CIO) (association model) having members.
- GDPR means the General Data Protection Regulation.
- Responsible Person means the Deputy Charman for the time being of the Trust.
- Register of Systems means a register of all systems or contexts in which personal data is processed by the Trust.

Data protection principles

The Trust is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

General provisions

This policy applies to all personal data processed by the Trust.

The Responsible Person shall take responsibility for the Trust's ongoing compliance with this policy. If anyone becomes aware of a breach, or potential breach of this policy, they shall notify the Chairman and the Responsible Person without delay, taking all reasonable steps to minimise the risk of any further breach.

This policy shall be reviewed at least annually.

The Trust shall register with the Information Commissioner's Office as an organisation that processes personal data.

Lawful, fair and transparent processing

To ensure its processing of data is lawful, fair and transparent, the Trust shall maintain a Register of Systems. The Register of Systems shall be reviewed at least annually.

Individuals have the right to access their personal data and any such requests made to the Trust shall be dealt with in a timely manner.

Lawful purposes

All data processed by the Trust must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).

The Trust shall note the appropriate lawful basis in the Register of Systems.

The data shall only be collected as a result of data subjects submitting an entry to the annual Awards for consideration or in the consideration of the placing of one of the Trust's Red Wheels. The Trust will then process the data as it is necessary for the Trust's legitimate interest reasons as the data is used to administer the Awards or for the placing of a Red Wheel. Other than the administration of the Awards and Red Wheels, if consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Trust's systems.

Data minimisation

The Trust shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

The data shall be limited to name and address data required to administer the Awards and Red Wheels. After each year's Awards, data retained will be limited to that consistent with the purposes of historical research consistent with the Trust's objectives.

The Trust shall take reasonable steps to ensure personal data is accurate.

Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date. Accuracy of the data is crucial to the continued good standing of the Trust.

Archiving / removal

To ensure that personal data is kept for no longer than necessary, the Trust shall put in place an archiving policy for each area in which personal data is processed and review this process annually. The archiving policy shall consider what data should/must be retained, for how long, and why.

Security

The Trust shall ensure that personal data is stored securely using modern software that is kept-up-to-date.

Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.

When personal data is deleted this should be done safely such that the data is irrecoverable. Appropriate back-up and disaster recovery solutions shall be in place.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Trust shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information is on the ICO website).

Accepted as a policy of the National Transport Trust at a Council meeting on 15th September 2023.

Stuart Wilkinson
Chairman

1st September 2023, version 1.0