

Recruitment Website Privacy Policy

Last updated: Oct 2018

Transport for Wales Rail Services ('We') are committed to protecting and respecting your privacy.

This policy (together with our Website Terms of Use (www.comeaboard.co.uk) and any other documents referred to in it) 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.comeaboard.co.uk or providing your information in the circumstances described below, you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the "Act"), the data controller is Transport for Wales Rail Services of St Marys House, 47 Penarth Road, Cardiff, CF10 5DJ

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 (www.comeaboard.co.uk). This includes information you provide when you register to use our site, apply for a position using our site, register to receive email updates, when you report a problem with our site or make a complaint. The information you give us may include your name, address, e-mail address, phone number, personal description, geographical location, IP or MAC address or details regarding your use of your mobile device or PC.

Information we collect about you. Regarding each of your visits to our site we may automatically collect the following information:

technical information, including the Internet protocol (IP) address used to connect your computer to the internet, your login information, 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); 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.

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 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.

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
To allow you to apply for jobs at Transport for Wales Rail Services.	Consent
To allow you to register your interest in jobs at Transport for Wales Rail Services.	Consent
To contact you in respect of any application you make, or interest that you register.	Consent

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

Purpose of processing	Legal basis for processing
To administer our sites and for internal operations, including troubleshooting, data analysis, testing, research/ statistical and survey purposes.	Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject

To improve our sites to ensure that content is presented in the most effective manner for you and for your computer.	Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject
As part of our efforts to keep our sites safe and secure.	Processing is necessary to protect the vital interests of a data subject or another person.

4. Sharing Your Information

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

Business partners, suppliers and sub-contractors for the performance of any contract we enter with them or you.

Analytics and search engine providers that assist us in the improvement and optimisation of our sites.

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 our 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.

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 Transport for Wales Rail Services will store different types of customer information for:

<i>Prospective Candidate Information</i>	
Successful applicants	Data will be retained for 6 years after your employment ends
Unsuccessful applicants / not yet applied for a position	If you have not accessed the site for 12 months, you will be notified and if there is no further response then your account will be closed, and data removed.

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 are part of Transport for Wales Rail Services, which trains its employees regarding 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 at customer.relations@tfwrail.wales

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 at customer.relations@tfwrail.wales

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 customer.relations@tfwrail.wales or by post to the following address: Transport for Wales Rail Services, St. Mary's House, 47 Penarth Road, Cardiff, CF10 5DJ

If you are unsatisfied with the response, you can contact the Data Protection Officer at data.protection@tfwrail.wales

You have the right to complain to a data protection authority about our collection and use of your personal information. If you are based in the European Economic Area, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries are available on the EU Commission's website via the following link:

http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm)

The controller of your personal data is Transport for Wales Rail Services.