

## Data protection policy

The Data Protection Act 1998, the Privacy and Electronic Communications Regulations 2003 and their codes of practice govern the way in which we collect and use personal data.

The Company collects and uses certain information about people in order to run the business effectively. This information comes from customers, staff, suppliers and other people with whom we communicate. We ensure that when personal data is first obtained, the individual knows why their data is being processed and where necessary, has consented to the processing. Where personal data is being processed (used, amended, stored, retrieved, disclosed or destroyed by or on behalf of thetrainline.com), we ensure that the data protection principles are followed to comply with the law.

Our privacy policy which explains how we handle our customer's personal information is publicly available on our websites.

### The Rules

At all times personal data will be:

- processed fairly and lawfully e.g. where an individual has consented to the processing or the processing is necessary for compliance with a legal obligation. Processing of 'sensitive personal data' is subject to additional conditions;
- obtained for one or more specified purposes and processed in line with those purposes;
- relevant and not excessive;
- accurate and kept up to date;
- kept no longer than necessary;
- subject to appropriate technical and organisational measures to protect against unauthorised processing and against loss or destruction; and
- not transferred outside the European Economic Area unless an adequate level of protection for the rights of individuals is in place.

### Individuals' rights

The Company will comply with the rights of individuals in respect of whom we process personal data. These include an individual's right:

- of access to their data
- to prevent processing likely to cause damage or distress
- to prevent direct marketing

Failure to comply with this policy and data protection laws by an employee may result in disciplinary action up to and including dismissal. Contractors, consultants and agency workers may have their contracts terminated without notice. Examples of potential disciplinary offences include:

- selling (or attempting to sell) personal data relating to an individual
- disclosing personal data without authority or lawful reason.
- not checking who personal data is being disclosed to

thetrainline.com also reserves the right to take such other action short of dismissal (including removing the right of access to personal data) as may be appropriate in the circumstances.

If you have doubts about whether processing or disclosing personal data is fair and lawful, you should contact your line manager, who, if in doubt, will contact the Legal Director.

### Your personal data

As your employer, thetrainline.com needs to keep information about you for purposes connected with your employment, including information for payroll purposes, career development, training records, etc.

The information we hold will, in the main, be for management and administrative use, but we may, from time to time, need to disclose information we hold about you to relevant third parties, e.g. where legally obliged to do so by government agencies or where requested to do so by you for the purpose of giving a reference.

You have a right to access personal information held about you on company files and the company will allow you such access, providing you give Human Resources reasonable notice. This reasonable notice is required to ensure that confidentiality is maintained with regard to other employees' data that may be held on the same or adjacent files.

The company will endeavour to provide you with access to your files on request in a timely fashion. The company legally has up to 40 days of receiving your request to respond, provided that:

you have supplied any information that is reasonably required to confirm your identity and the location of the relevant information  
the company has not already complied with an identical or similar request by you with the previous two months.