



PWI PRIVACY POLICY



Last updated: 18th May 2018

The Permanent Way Institution (PWI) takes your privacy seriously. This Privacy Notice explains in detail the types of personal data we may collect about you to enable us to give you the best possible experience when you interact with us. It also explains how we'll store and handle that data and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how the Permanent Way Institution uses your data. We encourage you to read this policy thoroughly. We hope the following sections will answer any questions you have but if not, please do get in touch with us.

Our privacy promise:

We promise:

- To keep your data safe and private.
- Not to sell your data.
- To give you ways to manage and review your marketing choices at any time.

Who is the Permanent Way Institution and how can you contact us?

When we refer to 'PWI' in this Privacy Policy, we mean Permanent Way Institution Ltd. The PWI is a technical institution providing technical knowledge, advice and support to all those engaged in rail infrastructure systems worldwide. You can find out more about the PWI on our website at www.thepwi.org.

The PWI is the data controller and responsible for processing the personal information you provide to us. The PWI is registered with the Information Commissioners Office in the UK.

If there's anything you're unsure about in this Privacy Policy, feel free to contact us at secretary@thepwi.org or on +44 1277 230031.

What information we collect

We will need to ask you for certain personal information to enable us to give you the best possible experience when you become a member of our institution and when you use our products and services. We will also collect other information about you and the devices you use to access our website, or we may ask third parties to do this for us, in these cases we do so by using technologies such as cookies. See also our [Cookie Policy](#).

Contact information

When you apply for PWI membership or purchase a product or service from us, we will ask you to provide some contact information. Contact information may include some or all of the following: full name, title, residential address, date of birth, landline and mobile phone number, email addresses, company name and address and/or course title and place of study.



Personal data

If you are applying for membership, we will also ask you to provide information about your railway work experience, your main technical discipline, your professional qualifications and technical awards and what areas you are interested in developing.

If you are applying to become a Fellow of the PWI or professionally registered with us, you will also need to provide details of your academic qualifications, work experience, employment details and record of professional development.

Payment

Where the services you select carry a cost, we will ask you to provide some payment information. Payment information is optional and may include some of the following: credit card and debit card details, direct debit details.

Security

To access your membership dashboard and to book events or purchase textbooks at the discounted member rate, we will ask you to log in to our website using your username and password that you chose when you joined the PWI.

Device

We also collect certain data automatically from your visit to our website or use of our services. This may include (but is not limited to) some or all of the following: How you connect to the internet (including IP address), how you engage with our site, screen resolution, browser data stored on your device (such as cookies – see also our [Cookie Policy](#)), information about the device software you are using such as internet browser and location data (city, region of the IP address you used when accessing our services).

How we use your information

We use your personal information in lots of ways to make our products and services as effective as possible.

To enable you to access member only content and discounts on our website

We will use your information to accept you as a new/returning customer enabling you to access member only technical content, your bespoke CPD e-portfolio and to book events and purchase books at the discounted member rates.

To let you know about significant changes to our products, terms or privacy policy

We will let you know by email, Journal or when you log in to the site if there are significant changes to our products, their features, our terms, or our privacy policy.

To process your annual membership subscription

We will use your information to request payment of your membership subscription. If you set up a direct debit with us, we will write to you to inform you that we intend to collect your



annual subscription. Your bank, through our Direct Debit processing bureau may let us know if your account details relating to your PWI subscription change. If this happens, we reserve the right to update these details to make sure your access to our services isn't interrupted. We do not hold or retain any debit or credit card details and all bank account information is encrypted.

To provide and improve customer support

We will use your information to be able to provide and improve the customer support we provide to you (e.g. when you have questions or when you forget your login information).

To send you service communications

We will use your information to contact you to provide you with relevant information about the services you receive as a member or have expressed an interest in. We will tell you if there are any changes or issues affecting existing services and to tell you about new opportunities.

To process your application to become professionally registered

Upon your request, we will use your information to assess whether or not you meet the required competence and commitment criteria for the grade of registration you are seeking.

Marketing

We will use your information for marketing purposes such as if we think one of our products, services or offers may interest you, we may contact you about them by email or through the post. If your PWI membership subscription has finished, we may contact you and invite you to re-subscribe to the same or different service or product, or to use certain free features on our website.

You can opt out of marketing communications at any time by following the instructions in the email or by contacting us at secretary@thepwi.org

Market research

The PWI may select particular customers and invite them to be involved in market research. If you accept this invitation, we will use the feedback you give us to improve our products and services.

Administration of prize draws, membership offers, surveys and other promotional activities

From time to time we will run prize draws, promotions and surveys and we will use the personal data you provide to us to run such activities and to do what we agree to do as part of them.

Internal training purposes

We will use your information to ensure that our team has the knowledge and expertise they need to ensure we provide the best possible experience to our customers when interacting with us.



Reporting and analytical purposes

We will use your information for reporting and analytical purposes (e.g. how many of our members are in the north or south of the country) to enable us to improve our products and services and to provide appropriate levels of support to our customers.

Tracking activity

We will use your information to track your activity on our website to help us better understand your interests and how you interact with us. We may also use this information to help us detect if someone else is trying to access your account or use the services you take from us. We will also use this information to better engage with you and to ensure that you get the best service we can provide and to improve our products in the future.

To maintain our records and other administrative functions

Like any business, we need to ensure that we maintain comprehensive and up to date records of the ways we process your personal information and other operational activities and therefore we will process the information you provide for record-keeping, updates and general administrative purposes.

Complaint and dispute resolution

Whilst we will try to make sure that you are happy with the service we provide and do not feel the need to complain, if you do complain to us, we will use the information we have about you to help us manage your complaint.

To comply with the law

Like any other business, we are required to comply with many laws and regulations. We will, where necessary, use your personal data to the extent required to enable us to comply with these requirements.

Email tracking

The PWI may use performance tracking technology within our emails to improve our future interactions with you. This means we are able to capture information including (but not limited to) the time and date you open our e-mails and the type of device used to open the email. We use this information primarily to understand whether our e-mails are opened and what links are clicked on by our customers. We then use this information to improve the emails that we send to you and the services that we provide.

The PWI will never pass your personal data to any third party for marketing purposes. Further information is included in our [Cookie Policy](#).

Further uses of your personal information not described in this Privacy Policy

If we use your personal information for any purposes that are not set out in this Privacy Policy, we promise to let you know exactly what we will use it for before we go ahead and use it and obtain your consent where appropriate.



What are the legal grounds for handling personal information?

Data protection laws require that, where we process your personal data, we must satisfy at least one prescribed condition for processing. These are set out in data protection law and we rely on a number of different conditions for the activities we carry out.

Necessary for performance of a contract

In most cases, the information described above will be provided to us by you because you want to take services from us or engage with us. Our use of your information will be governed by contract terms. Giving this information to us is therefore your choice. If you choose not to give all or some of it to us, this may affect our ability to provide you with the services you want. In particular, we may rely on this condition for processing your data in the following scenarios:

- To enable you to access member only content and discounts on our website.
- To let you know about significant changes to product, terms or privacy policy.
- To process your annual membership subscription.
- To provide and improve customer support.
- To send you service communications.
- To process your application to become a professionally registered engineer.

Necessary in our legitimate interests

In the United Kingdom, we can also use personal information where the benefits of doing it are not outweighed by the interests or fundamental rights or freedoms of individuals. The law calls this the “Legitimate Interests” condition for processing. Where we rely on it, the benefits being pursued by us are:

- Internal training purposes - to enable us to train our staff to better provide services to our customers.
- Running a marketing services and data business - Like any commercial organisation, we run a business and process information where necessary to do so. We have put in place various safeguards to ensure that individuals' whose personal information we handle are not unduly harmed by the activities we use their personal data for. These include making information available to individuals so that they understand how their personal data will be used by the PWI, explaining their rights to obtain the information we hold and to have their information corrected or restricted and providing information about how individuals can complain if they are dissatisfied.
- Reporting and analytical purposes – to provide management information and information to improve our services.
- Tracking activity – to help us to improve our services.



- To maintain our records and other administrative purpose - to enable the PWI to provide the most accurate data for our customers.
- Complaint and dispute resolution – we will need to use customer data when looking into queries and complaints.
- To improve data accuracy and completeness - When you register for our services you may supply us with additional information about yourself which we will use to improve our data accuracy and completeness.
- Email tracking – in order to improve our communications to our customers.
- Invitations to participate in market research - In order to improve the service we offer to customers, we may ask you to participate in research for time to time. It is entirely up to you whether you choose to do so.

Consent

Where we collect other information from you, such as when we use cookies to collect information about the device you use to access our website, or sometimes third parties collect this on our behalf, you will be asked to consent to this before using our website. If you choose not to give your consent, or you later remove your consent, this may affect our ability to provide you with the services you want. We may also rely on consent in the following scenarios:-

- Marketing - From time to time, we would like to let you know about products, services and offers from the PWI. You can opt-out from direct marketing in all direct marketing emails.
- Market research – we may send you invitations to participate in market research (see above). If you do so, your feedback is given with your consent.
- Administration of prize draws, membership offers, surveys and other promotional activities

Who we share your personal information with

We share your personal information only with those persons who need to handle it so we can provide the PWI products and services you've signed up to. We share it with your local PWI Section Secretary who manages some parts of the services for us; with suppliers who provide services to us which require access to your personal information; and with distributors and agents involved in delivering the services we provide where necessary for them to do so. We will never sell your data.

Here's the policy we apply to those third-party organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.



The third parties we work with are:

- IT companies who support our website and other business systems.
 - Premier IT, Node4, Dropbox, Acronis, PCA Predict
- Payment institutions regulated by the FCA who process our direct debits and card payments
 - EazyCollect Services, SagePay, BACS and BACS Data
- Operational companies such as publishers and delivery couriers.
 - Lavenham Press, Royal Mail
- Direct marketing companies who help us manage our electronic communications with you.
 - Campaign Monitor, Survey Monkey, Get Feedback

As a PWI member, you are able to search for other members by name, country and technical discipline. You are then able to view the member's public profile, which includes full name, title, email address, section, grade of membership and level of registration if known. Members can hide their profile at anytime by logging into their Dashboard.

Lastly, if you are professionally registered or seeking to become professionally registered with us, we will also share your personal information with our trained reviewers, our Professional Affiliate partner, IGEM, our Membership Committee and the Engineering Council. This is to ensure your registration is formally assessed and recorded on the national register of engineers.

Where in the world do we send information?

The PWI is based in the UK, which is where our databases and their backups are stored. The vast majority of our suppliers, distributors and agents are UK companies all of whom are bound by the GDPR. Where we share your data to fulfil our service to you, contracts that are GDPR compliant are in place.

To help us provide certain aspects of our services, we will sometimes need to share your personal data with third parties and suppliers outside the European Economic Area (EEA), such as Australia or the USA. If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, US owned companies, such as Dropbox and Survey Monkey, are overseen by the U.S. Federal Trade Commission and comply with the EU-U.S. Privacy Shield Framework, a scheme approved by the European Commission as providing a suitable level of high quality protection.

Your rights to how we use your personal information

It is important that you understand your rights in relation to your personal information and how you can contact us if you have questions or concerns.

You have the right to request a copy of any information about you that the PWI holds at any time, and also to have that information corrected if it is inaccurate. You can also request that we restrict or stop processing your personal information or delete it.

To ask for your information, please email secretary@thepwi.org or contact Membership Services, PWI, 5 Mount Crescent, Brentwood, CM14 5DB. To ask for your information to be



amended, please contact our Membership Services team and if you are a PWI member, you can also make changes by logging in to your PWI member account. It's worth noting that in some cases if you do ask us to correct, delete or stop processing it, we won't always be required to do so. If that is the case, we will explain why.

If you've given us consent to process your personal information, you have the right to withdraw that consent at any time by contacting us at secretary@thepwi.org. In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data. You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

In certain circumstances (e.g. where you provide your information to us (a) with consent to process it or (b) where the processing is necessary for the performance of our contract with you) you can require that we provide the information we hold about you either to you or a third party in a commonly used format. This only applies if we are processing it using automation only. If you would like more information about this, let us know by contacting us at secretary@thepwi.org.

We will try to ensure that we deliver the best levels of customer service but if you think we are falling short of that commitment, please let us know by contacting us at secretary@thepwi.org. If you're still unhappy with any aspect of how we handle your personal information you also have the right to contact the Information Commissioner's Office (ICO), the supervisory authority that regulates handling of personal information in the UK. You can contact them by:

1. Going to their website: <https://ico.org.uk/>
2. Phone on: 0303 123 1113
3. Post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

How we keep your personal information secure

Online privacy and security is the most important aspect of any customer service and we take it extremely seriously.

We use a variety of the latest technologies and procedures to protect your personal information from unauthorised access, destruction, use or disclosure. Access to your personal data is password-protected and we restrict access to your personal data to those employees, and third parties, who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards to protect your personal data.

The PWI protects your information over the internet by using secure web server technologies, which allows web browser programs (such as Microsoft Internet Explorer) to interact with the PWI's web server via an encrypted session. The PWI employs an enforced Secure Sockets Layer (SSL) connection that provides an encrypted connection between your computer and the PWI. The 128 bit encrypted connection scrambles ordinary text or data into cypher text to safeguard sensitive information during its journey across the internet. The



information is decrypted, or put back into a readable format, when it reaches its intended destination. When you visit the PWI website you may move in and out of secured areas. Any time that you are on a payment page or logged in as a member, you will be in a secured area.

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

How long we keep your personal information for

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected. We may also keep it to comply with our obligations as a professional engineering institution, resolve any disputes and enforce our rights. These reasons can vary from one piece of information to the next and depend on the products or services you're signed up to, so the amount of time we keep your personal information for may vary. In all cases, our need to use your personal information will be reassessed on a regular basis, and at the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Changes to this Privacy Policy

We can update this Privacy Policy at any time and ideally you should check it regularly for updates. We won't alert you to every little change, but if there are any really important changes to the Policy or how we use your information we'll let you know and where appropriate ask for your consent.

Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it. If you have any questions that haven't been covered, please contact our Membership Services team who will be pleased to help you:

- Email us at: secretary@thepwi.org
- Or write to us at: Membership Services, PWI, 5 Mount Crescent, Brentwood, CM14 5DB