

## BCA Privacy Policy

The Bedford Commuters Association (“BCA”) has adopted a Privacy Policy to both protect member's and other contact's data and to set out how we use that data. BCA uses the “Legitimate Interest” features in the GDPR and in accordance with the ICO Guidance has not revalidated email addresses to obtain explicit permission to send communications. Any recipient of our emails can elect to unsubscribe at any time; our newsletters contain an option to do this; we will always act on this before our next communication. The GDPR requires Data Controllers (such as the BCA) to adequately protect data and the BCA follows such guidance etc. Specifically:

1. The BCA does not share your email address or other information we hold about you with third parties (it is visible to our ISP, who handle our email traffic), and potentially in the future, a mailing list host.
2. Your email address and other information will not be shared with other members of the BCA (except for '3' and '4' below), other than the Committee members who need your information to process your membership, send you newsletters and other updates etc.
3. If you email one Committee member directly, and another Committee member is best placed to help, your email may be forwarded as needed. If you do not want this to happen, please let us know at the time you send your email.
4. We will not share your email address and other contact information with Thameslink (or successors) or other parts of the Rail Industry unless it is very clear you want us / need us to do so. For instance, we cannot lobby for a revisit of a Delay Repay decision without providing personal information about the disputed journey. If there is any doubt, we will double check you are comfortable sharing.
5. BCA is an affiliate Rail User Group to Railfuture. We do not share membership data with Railfuture.
6. Because we are exercising rights under "legitimate interest":
  - We will not contact you other than by email, unless (1) you are a Royal Mail newsletter recipient (note: we strongly prefer to email newsletters and would only add additional recipients in exceptional circumstances); (2) you raise a question to us / ask for help and include a phone number - we might call you to discuss the matter.
  - We will not send you mainly marketing emails.
7. We reserve the right to amend this Data Privacy Policy from time to time without prior notice. Please check our website [<http://bedfordcommuters.org.uk> ] regularly for any amendments.

30 September 2018