



PRIVACY NOTICE AND COOKIE POLICY



NATIONAL TRACTION ENGINE TRUST

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1. Introduction

- 1.1. The National Traction Engine Trust ("NTET", "we", "our", "us") respects your privacy and is committed to protecting the personal data we process. This Privacy Notice and Cookie Policy sets out how we obtain, use, and protect your personal data in accordance with the UK GDPR and the Data Protection Act 2018.
- 1.2. This Privacy Notice should be read alongside any other privacy information we provide where appropriate. It complements our internal information governance and data protection policies.
- 1.3. If you have any questions about this policy or how we handle your data, you can contact us at:

By Post:

National Traction Engine Trust
Virginia Cottage
Upper Vobster
Radstock
England
BA3 5SA

By Email:

compliance@ntet.co.uk

2. How We Obtain Personal Data

- 2.1. We obtain personal information directly from you when you:
 - 2.1.1. enquire about our organisation or services;
 - 2.1.2. subscribe to our newsletters, publications or updates;
 - 2.1.3. become a member;
 - 2.1.4. make a donation;
 - 2.1.5. purchase from our online shop;
 - 2.1.6. take part in surveys (which may be hosted on trusted third-party platforms such as Fillout); or
 - 2.1.7. visit our website.

This may be done via our website, by phone, email, or through paper forms.

- 2.2. We may also receive personal data from third parties, including parents, guardians or sponsors, event organisers, payment providers, other NTET personnel and publicly available sources, where lawful and relevant to our activities.

3. What Data We Collect and Why

Activity	Data Collected	Purpose	Legal Basis
Membership Applications and Renewals	Name Address Email Phone number DOB Payment details	Process memberships Send publications Manage renewals Administer Gift Aid	Contract – to fulfil membership agreements. Legal obligation – for Gift Aid reporting to HMRC. Legitimate interests – sending relevant NTET communications and publications.
Steam Apprentice Club (SAC) Sponsorship	Name Address Email Phone number	Manage junior membership, sponsorship admin, event participation, safety measures.	Contract – to provide membership services. Legitimate interests – ensuring safe and appropriate interaction with minors. Consent – for marketing communications and any optional photo use.
Volunteer Recruitment and Engagement	Name Address Email Phone number Interests, experience or skills	Recruit volunteers, match individuals to suitable roles, manage involvement.	Legitimate interests – to support NTET's operations and events. Consent – if providing optional info or subscribing to communications.
Event Participation and Communications	Name Address Email	Register attendees, send joining instructions, provide updates	Legitimate interests – managing participation.

	Photographs and video recordings	Publicity, promotional and historical archive purposes	Legitimate interests in promoting and documenting the charity's activities. Where consent is required by law or appropriate in the circumstances (for example, for certain close-up or individually identifiable images), we will obtain it before use.
Publications and Mailings	Name Address Email Membership Status	Distribute member benefits and publications.	Contract – as part of membership service. Legitimate interests – ensure members receive expected content.
Online Shop Purchases	Name Delivery Address Payment Details Contact information	Fulfil orders, process payments and send goods.	Contract – sale of goods. Legal obligation – retain payment records for accounting.
General enquiries via email or contact forms	Name Email Message content	Respond to queries Offer support Provide information	Legitimate interests – to communicate with individual requesting information.
Member Area (Logged-In Area)	Login details Name Email Membership ID User preferences	Provide members with content and profile access.	Contract – part of the membership service. Legitimate Interests – managing secure access.
Rally Organisers Area	Name Email Address Phone Number	Supporting events, ensuring safety and sharing operational documents.	Legitimate interests – managing Supported Events.

	Submitted documents Risk assessments		
Surveys and Feedback	Name Email Address Phone Number Survey Responses	Gather feedback, improve services, develop member offerings, understand member/visitor needs	Legitimate interests – to improve our services and offerings. Consent – where optional or sensitive data is provided.

Note:

Where we rely on legitimate interests, we ensure that we have conducted a Legitimate Interests Assessment to confirm that our processing is proportionate and respects your rights.

4. Use of Personal Data

4.1. We only use your data where necessary and for purposes you would reasonably expect:

- 4.1.1. To process and manage your membership, including applications, renewals, benefits delivery, and Gift Aid declarations;
- 4.1.2. To process donations and associated correspondence or acknowledgements;
- 4.1.3. To provide access to members-only or organiser-restricted areas of our website and manage access credentials;
- 4.1.4. To send newsletters, publications (such as Steaming), updates, and relevant event information;
- 4.1.5. To respond to your enquiries and correspondence;
- 4.1.6. To protect children, young people and adults at risk, comply with safeguarding obligations, and maintain safeguarding records where required by law or where necessary for reasons of substantial public interest, vital interests or the establishment, exercise or defence of legal claims;
- 4.1.7. To administer volunteer engagement, rally support, and event coordination, including processing submitted forms and steward information;
- 4.1.8. To deliver goods and services purchased through our online shop;
- 4.1.9. To manage and improve our website, including analysing usage patterns and technical performance; or
- 4.1.10. To conduct surveys, gather feedback, and improve our services and member offerings, including where surveys are administered using secure and trusted third-party platforms (e.g., Fillout).

5. Marketing Communications

5.1. We may send you electronic marketing communications where you have consented or where another applicable exception under the Privacy and Electronic Communications Regulations 2003 permits us to do so. Service communications relating to an existing membership, purchase, booking or volunteer role are not marketing where they are necessary to administer that service.

5.2. You may opt out of marketing at any time by using the unsubscribe facility in the message or contacting us. Opting out of marketing will not prevent us from sending necessary administrative or service communications.

6. Third Parties and Data Sharing

- 6.1. We do not sell or trade your personal data. We may use trusted third-party service providers including providers of website hosting, payment processing, email distribution, surveys, analytics and cloud services (for example Mailchimp, Stripe, GoCardless, Google Analytics and Fillout). These providers are required to keep your data secure and confidential. We may also use trusted third-party survey platforms (such as Fillout) to collect and process survey responses. These providers are required to keep your data secure and confidential.
- 6.2. We may also disclose personal data where necessary to insurers, professional advisers, auditors, regulators, HM Revenue & Customs, law enforcement agencies, safeguarding authorities, the Disclosure and Barring Service (where applicable), and other organisations where we are required or permitted to do so by law or where necessary to protect individuals or the charity's legitimate interests.

7. Cookie Policy

- 7.1. Cookies are small text files stored on your device to improve your website experience.
- 7.2. Our cookies help us:
 - 7.2.1. Make our site function effectively
 - 7.2.2. Improve security and speed
 - 7.2.3. Understand how people use our website
 - 7.2.4. Inform future content and functionality
- 7.3. You can manage or withdraw cookie consent at any time using your browser settings or by following the link in our Cookie Consent Banner
- 7.4. Google Analytics: Google Analytics may process information using servers located outside the UK. Where personal data is transferred internationally, appropriate safeguards are applied as described in Section 9.

8. Data Security

- 8.1. We use:
 - 8.1.1. SSL encryption for online forms
 - 8.1.2. Secure databases and servers
 - 8.1.3. Trusted payment providers (e.g., Stripe, GoCardless)
- 8.2. Access to your data is restricted to authorised personnel only.
- 8.3. Safeguarding records are stored separately from routine operational records and access is restricted to authorised safeguarding personnel who require access as part of their responsibilities.

9. International Transfers

- 9.1. Some of our service providers may process personal data outside the United Kingdom. Where this occurs, we ensure appropriate safeguards are in place, such as the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, an adequacy decision, or another lawful transfer mechanism under UK data protection law.

10. Data Retention

- 10.1. We retain personal data only for as long as necessary for the purposes for which it was collected, including to comply with legal, accounting, safeguarding and regulatory obligations, to resolve disputes and to establish, exercise or defend legal claims.
- 10.2. Different categories of personal data are retained for different periods depending on their purpose and applicable legal requirements. The following are examples of our standard retention periods, examples include:
- membership records – membership duration plus six years;
 - donor and Gift Aid records – six years after the end of the relevant accounting period;
 - financial records – six years after the end of the relevant financial year;
 - supplier and contractor records – contract duration plus six years (or twelve years where the contract was executed as a deed);
 - volunteer records – involvement plus six years;
 - safeguarding records – in accordance with statutory safeguarding guidance and applicable limitation periods;
 - accident and incident records – for the periods required by health and safety legislation, safeguarding guidance, insurers and applicable limitation periods;
 - marketing suppression lists – retained indefinitely using minimal information to ensure that opt-out preferences continue to be respected;
 - website enquiries – normally twelve months unless incorporated into another operational record.
- 10.3. Some records are retained permanently or for archival purposes where they document the history and governance of the charity. Where appropriate, personal data will be anonymised before archival retention.
- 10.4. Retention periods may be extended where necessary in connection with legal proceedings, insurance claims, safeguarding investigations or regulatory enquiries. At the end of the applicable retention period, records are securely destroyed or anonymised.
- 10.5. Our detailed Records Retention Schedule is available on request and forms part of our wider information governance framework.

- 10.6. In exceptional circumstances, records may be retained beyond the stated retention period where required by law, regulatory investigation, safeguarding obligations, insurance requirements or actual or anticipated legal proceedings.

11. Your Rights

- 11.1. You have the right to:

- 11.1.1. access your personal data;
- 11.1.2. rectify inaccurate or incomplete data;
- 11.1.3. request erasure where applicable;
- 11.1.4. restrict processing;
- 11.1.5. object to processing based on legitimate interests;
- 11.1.6. withdraw consent where processing relies on consent;
- 11.1.7. request portability of personal data where applicable; and
- 11.1.8. lodge a complaint with the Information Commissioner's Office (ICO) if you believe we have not handled your personal data lawfully. You can find further information at www.ico.org.uk.

- 11.2. To exercise your rights, contact us at compliance@ntet.co.uk.

12. Automated Decision Making

- 12.1. The NTET does not make decisions about individuals based solely on automated processing that produce legal or similarly significant effects.

13. Links to Other Websites

- 13.1. Our website may contain links to third-party websites. We are not responsible for their content or privacy policies. We recommend reviewing their privacy notices separately.

14. Policy Updates

- 14.1. This policy will be reviewed regularly and may be updated to reflect changes in legislation or our data protection practices. Please check this page from time to time to stay informed.