



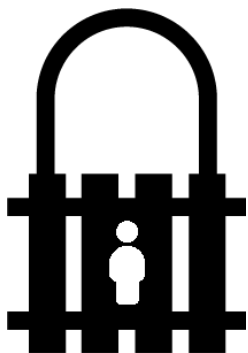
Privacy Notice

This privacy notice applies to the personal information that Network Rail collects about you, or that you provide to us, for the purposes of providing the Sentinel Authority-to-Work service. It explains how and why we use your personal information, who we disclose it to and how we protect your privacy.

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1. Introduction

We take your right to privacy seriously and want you to feel comfortable when using our services. Should we ask you to provide certain information by which you can be identified you can be assured that it will only be used in accordance with this privacy notice.

About this Privacy Notice:

References to **we**, **us** or **our** means Network Rail Infrastructure Limited who are the Data Controller of data processed within SENTINEL. You can contact us by writing to:

Sentinel Data Controller
Network Rail
The Quadrant:MK
Elder Gate
Milton Keynes
MK9 1EN

References to **you** or **your** means the person accessing and using the website (as defined herein) or the person who otherwise provides their personal information to us or about whom we otherwise collect personal information as explained in this privacy notice.

References to the **website** means the SENTINEL website and sub-sites found at www.info.railsentinel.co.uk.

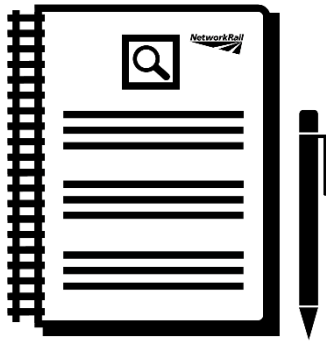
Personal information is information about you, and which identifies you.

Network Rail have a separate privacy notice which applies to the personal information that we collect about our employees.

The website and the SENTINEL service are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notices we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your personal information. This privacy notice supplements the other notices and is not intended to override them.

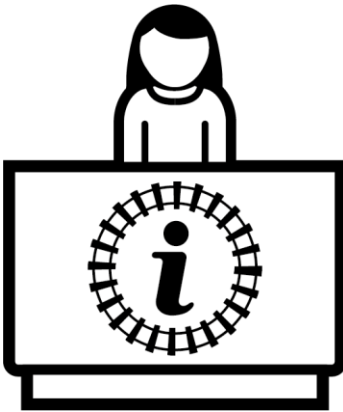
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2. Definitions

Initials	Definition
ATW	Authority To Work
COSS	Controller of Site Safety
D.O.B.	Date of Birth
EEA	European Economic Area
N.I.No.	National Insurance Number
ORR	Office of Rail and Road
QR	Quick Response
RFID	Radio Frequency Identification Device
TVP	Track Visitor's Permit
VAT	Value Added Tax

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3. Who is responsible for the personal information that we collect?

We are the data controller for the purpose of data protection law, in respect of your personal information collected or obtained as outlined within this privacy notice. This is because we dictate the purpose for which your personal information is used and how we use your personal information.

“In line with the Office of Rail and Road (ORR) Operating Licence requirements, Sentinel is a safety critical service, managed by Network Rail, which provides near real time visibility, validation and verification of an individual’s Authority to Work (ATW) on the managed rail infrastructure in the UK.

The Authority to Work decision is taken in consideration of competence and fitness information retained within the system, as agreed in the Sentinel Scheme Rules and the Medical Standard.”

If you have any questions regarding this privacy notice or the way we use your personal information, you can contact the [Sentinel Data Controller](#).

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4. What personal information we hold about you and how this information is obtained

We collect and process the following categories of information about you for the purposes of enabling the **ATW** (Authority to Work) decision to be taken and recorded, as required by the independent regulator; the **ORR** (Office of Rail and Road):

- **Business contact details**

Name, company name, company website, supplier licence number, company email address, company office address, place of work, company telephone number, company mobile number and company fax number.

- **Comments you make**

Your views, opinions, feedback, comments, requests, enquiries and complaints.

- **Payment information**

Details of amounts your sponsor pays us, amounts owed to us, amounts we pay or owe to your sponsor, relevant bank account or other payment details and any relevant tax information, including VAT number where applicable.

- **Website technical information**

Through your internet browser or electronic device, certain information is collected by most websites or automatically through your electronic device, such as your IP address (i.e., your computer's address on the internet), screen resolution, operating system type (Windows or Mac) and version, internet browser type and version, electronic device manufacturer and model, language, time of the visit and pages visited.

Through Cookies: Cookies allow us to recognise your device and to collect information such as IP address, internet browser type, time spent using the website and the pages visited.

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- **Website usage data**

Information about how you use our website and our services.

This information may be provided:

- During communications between you, your sponsor, a training and/or a medical provider and us (including by direct system entry, phone, email, post or otherwise, including when making a data subject access request).
- Via your internet browser or electronic device.
- Via cookies.

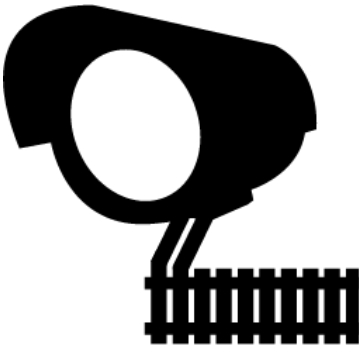
We may also receive the personal information about you from the following sources:

- Information you enter directly into “MySentinel”.
- Information you provide to your sponsor for entry and administration by them into the Sentinel system.
- Information from third party occupational health providers and other medical professionals.
- Information from third party training providers and other training professionals.
- Direct from a third party, e.g. from an employee (such as information about their family members), your employer, your sponsor, other parties and their advisors involved in transactions with us, other parties involved in delivering services with us.

You may provide us with personal information relating to third parties.

- We will use this personal information in accordance with this Privacy Notice. If you are providing personal information to us relating to a third party (e.g. Next-of-Kin), you confirm that you have the permission of the third party to share such personal information with us and that you have made the information in this Privacy Notice available to the third party.

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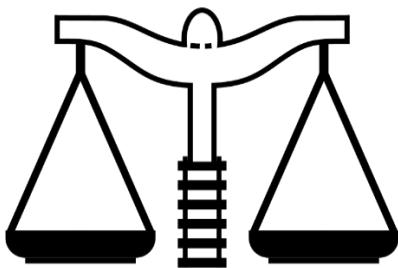
5. How we will use personal information we hold about you

We will only use your personal information when there is a lawful basis for us to do so. Most commonly, we will use your personal information in the following circumstances:

- Where we need to comply with a legal or regulatory obligation (**to comply with our legal obligations**).
- Where we or another person need to do so as part of carrying out a task in the public interest or carrying out public functions which are laid down in law, for example exercising statutory rights and carrying out our legal duties under our network and station licences to operate and maintain the national railway infrastructure) (**for the performance of public functions**).

Your personal information may be used by us, our employees, service providers, and disclosed to third parties for several different purposes which we have set out below. For each of these purposes, we have set out the lawful basis we rely on to do so.

Please note: We may process your personal information on more than one lawful basis depending on the specific purposes required. Please contact our [Sentinel Data Controller](#) if you need details about the specific lawful basis we are relying on to process your personal information where more than one lawful basis has been identified below.



For the health and safety of our staff, visitors, contractors and suppliers

Lawful basis:

- To comply with our legal obligations.
- For the performance of our public functions: namely operating and maintaining the national railway infrastructure, including ensuring health and safety and security and preventing and detecting crime.

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To operate, maintain, repair and manage our facilities, properties, assets, equipment and infrastructure, including the national railway infrastructure

Lawful basis:

- To comply with our legal obligations.
- For the performance of a contract with you or your sponsor.
- For the performance of our public functions (namely operating and maintaining the national railway infrastructure).

For fraud prevention

Lawful basis:

- To comply with our legal obligations.
- For the performance of our public functions (namely operating and maintaining the national railway infrastructure) or the performance of a third party's public functions (namely law enforcement functions).

For operational reasons, such as improving the performance of our public functions, our business and services, efficiency, training and quality control

Lawful basis:

- For the performance of our public functions (namely operating and maintaining the national railway infrastructure).

Complying with our legal or regulatory obligations (including in connection with a court order)

Lawful basis:

- To comply with our legal obligations.

To investigate concerns raised with and reports made to our Speak Out confidential reporting service or Network Rail's 24 Helpline

Lawful basis:

- To comply with our legal obligations.
- For the performance of our public functions (namely operating and maintaining the national railway infrastructure).

To make, collect and manage payments, charges, fees and expenses, including the collection and recovery of money owed to us

Lawful basis:

- For the performance of a contract with you or your sponsor.
- For the performance of our public functions (namely operating and maintaining the national railway infrastructure).

To manage and respond to requests for information, including freedom of information requests

Lawful basis:

- To comply with our legal obligations.
- For the performance of our public functions (namely operating and maintaining the national railway infrastructure).

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To manage enquiries, comments, complaints, feedback and requests

Lawful basis:

- For the performance of a contract with you or your sponsor.
- For the performance of our public functions (namely operating and maintaining the national railway infrastructure).

To administer and protect our business records, IT systems and our websites

Lawful basis:

- To comply with our legal obligations.
- For the performance of a contract with you or your sponsor.
- For the performance of our public functions (namely operating and maintaining the national railway infrastructure).

Failure to provide us with your personal information

We may be required to obtain your personal information to comply with our legal obligations or for the performance of our contract with you or to fulfil a request you have made. If you do not provide the relevant personal information to us, we may not be able to enter into the contract with you or properly perform our obligations under it. We may also be unable to fulfil your request.

Where your failure to provide information breaches a legal obligation, we may be required to report this to regulators or law enforcement bodies. We will generally notify you of the consequences of failing to provide us with required information at the time.

Automated decision making

We undertake processing of your personal information by automated means to make decisions about your **ATW** (Authority to Work) when you present your Sentinel Card at the time of “swipe-in”. The **COSS** (Controller of Site Safety) has the option to complete and record an appropriate risk assessment and override the automated decision, if necessary.

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6. To whom we may disclose your personal information

We may share your personal information with:

- **Our group companies**
Other companies and entities within the group of Network Rail Group, which we are a member of.
- **Our service providers**
Our business partners, suppliers, contractors and their sub-contractors for the performance of any contract we enter into with you or for the performance of any contract we enter into with them which relates to our business and under which they deliver works and services to us, including works and services which may involve processing personal information on our behalf such as IT service providers.
- **Third parties involved in engineering and maintenance works and other aspects of railway business**
Including third-party contractors (such as Training and Medical Providers), trade unions, etc.
- **Our professional advisers and agents**
Including our banks, accountants, lawyers, insurers, brokers, agents, consultants and other professional advisers that assist us in carrying out our activities and public functions.
- **Governmental, regulatory and legal authorities and third parties involved in legal action**
Government departments, governmental agencies, regulatory organisations and justice agencies (including the courts, tribunals, police, security services, Her Majesty's Revenue and Customs, local authorities, the Home Office, the Office of Rail and Road, the Information Commissioner, the Health and Safety Executive, the British Transport Police, **and other regulators and law enforcement bodies.**
- **Prospective sellers or buyers of our business and assets or our corporate group**
In the event that we sell or buy any part of our business or assets we will disclose your personal information to the prospective seller or buyer of such business or assets. If we or substantially all of our assets are acquired by a third party (or are subject to a reorganisation within our corporate group), personal information held by us will be one of the transferred assets.
- **Health professionals and emergency services**
In the event of an emergency we may disclose personal information to health and medical professionals and emergency services where the health, safety or security of a person is at risk.

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7. How we protect your personal information

We have put in place appropriate technical and organisational security measures to prevent your personal information from being accidentally lost, altered, used, disclosed or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to access this only and who are subject to a duty of confidentiality. In the case of third-party data processors, they will only process your personal information on our instructions and have their own legal obligations under data protection law to protect your personal information and keep it secure.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Where we will transfer your personal information to

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g.:

- With companies within the Network Rail Group with offices outside the EEA
- With your and our service providers located outside the EEA
- If you are based outside the EEA
- Where members of our staff need to access your personal information remotely while they are travelling outside the EEA

These transfers are subject to special rules under European and UK data protection law. In those circumstances, we undertake an assessment of the level of protection in light of the circumstances surrounding the transfer. We will make sure that any transfers are limited to the minimum amount of personal information possible and will always take steps to ensure that your personal information is adequately protected.

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In certain circumstances, we may need to seek your consent, unless there is an overriding legal need to transfer the personal information.

Where necessary, we have entered standard European Commission approved model data protection clauses with other companies within the Network Rail Group which have offices located outside of the EEA and with our external service providers and business partners in relation to the services they provide. This may involve processing personal information for which we are the data controller, from locations outside the EEA.

Our IT support is provided from across the world and when support is provided remotely, your personal information may be accessed from and therefore transferred to that country. If we transfer personal information outside the European Economic Area (EEA), we will implement appropriate and suitable safeguards to ensure that such data will be protected as required by applicable data protection law.

9. How long we will keep your personal information for

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information we hold, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information (and whether we can achieve those purposes through other means), and the applicable legal requirements.

In some circumstances, we may anonymise your personal information (so that it can no longer be associated with you), for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

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10. Your rights and choices in relation to your personal information

You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the information below for a summary of your rights. You can exercise these rights by contacting the [Sentinel Data Controller](#).

<p><u>Right of access to your personal information</u></p>	<p>You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.</p>
<p><u>Right to rectify your personal information</u></p>	<p>You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.</p>
<p><u>Right to erasure of your personal information</u></p>	<p>You have the right to ask that your personal information be deleted in certain circumstances. For example: Where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used. If you withdraw your consent and there is no other legal ground which we rely on for the continued use of your personal information. If you object to the use of your personal information (as set out below). If we have used your personal information unlawfully. if your personal information needs to be erased to comply with a legal obligation.</p>
<p><u>Right to restrict the use of your personal information</u></p>	<p>You have the right to suspend our use of your personal information in certain circumstances. For example:</p> <p>Where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information.</p> <p>The use of your personal information is unlawful, and you oppose the erasure of your personal information and request that it is suspended instead.</p>

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	<p>We no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims.</p> <p>You have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.</p>
<p><u>Right to data portability</u></p>	<p>You have the right to obtain personal information that you have provided to us in a structured, commonly used and machine-readable format and for it to be transferred to you or another organisation, where it is technically feasible. The right only applies where the use of the personal information you provided was with your consent or for the performance of a contract with you, and when the use of your personal information is carried out by automated (i.e., electronic) means.</p>
<p><u>Right to object to the use of your personal information</u></p>	<p>You have the right to object to the use of your personal information in certain circumstances:</p> <p>Where you have grounds relating to your situation and we use your personal information for our legitimate interests (or those of a third party) or for our public functions, including for profiling.</p> <p>If you object to the use of your personal information for direct marketing purposes.</p>
<p><u>Right to withdraw consent</u></p>	<p>You have the right to withdraw your consent at any time where we rely on your consent to use your personal information.</p>
<p><u>Right to complain to the relevant data protection authority</u></p>	<p>You have the right to complain to the Information Commissioner where you think we have not used your personal information in accordance with data protection law.</p> <p>We aim to resolve any concerns and requests you have, quickly and would ask that you contact us via our Sentinel Data Controller in the first instance. However, if you are not satisfied with the outcome of your enquiry to us, you can raise a complaint to the Information Commissioner's Office:</p> <p>Information Commissioner's Office Wycliff House Water Lane Wilmslow Cheshire SK9 5AF</p>

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No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is vexatious, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated of our timescales.

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11. Website cookies and third-party links

Third party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for how they handle your personal information. When you leave our website, we encourage you to read the privacy notice or policy of every website you visit.

A cookie is a small text file that's stored on your computer or mobile device when you visit a website. We use cookies to:

- Remember your preferences.
- Tailor our sites and services to your interests.

You can set your browser to not accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result. Information about deleting and controlling cookies can be found at www.aboutcookies.org

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You can find more information about the cookies used on our site and the reasons why in the table below.

Cookies used on this website

Here are the details for the cookies used on this website

Cookie Name	Purpose/Details	Expiry/Duration
ASP.NET_SessionId	Controls logged in user access during session.	Per logged in user session only
.ASPXAUTH	Controls logged in user access during session.	Per logged in user session only
_ga	Google Analytics - tool that helps website owners measure how users interact with website content. As a user navigates between web pages, Google Analytics provides website owners JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page.	2 years
_gat	Google Analytics - tool that helps website owners measure how users interact with website content. As a user navigates between web pages, Google Analytics provides website owners JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page.	Immediate Expiry
_gid	Google Analytics - tool that helps website owners measure how users interact with website content. As a user navigates between web pages, Google Analytics provides website owners JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page.	Immediate Expiry

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12. Changes to our privacy notice

This privacy notice was last updated in April 2020.

Any changes we make to this privacy notice in the future, will be posted on this page of the website and where appropriate, notified to you by email. The updated privacy notice will take effect as soon as it has been updated or otherwise communicated to you.

13. Your duty to inform us of changes

Please keep us informed via the “[MySentinel](#)” portal, if your personal information changes during your relationship with us.

14. How to contact us

Questions, comments and requests regarding data protection matters are welcomed and should be addressed to our [Sentinel Data Controller](#).

[Sentinel Data Controller](#)

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