

Privacy and Cookies Notice

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Introduction

Trenitalia c2c Limited (trading as c2c) is an award-winning train operator that runs services between Fenchurch Street, in the heart of the City of London, and Basildon, Shoeburyness, and Grays and is headquartered in the City of London. We are committed to providing our customers industry leading services, often through groundbreaking innovations, like our award-winning Automatic Delay Repay system.

We know you take your right to privacy seriously. We take your right to privacy seriously, too. We want you to have clear, accessible and easy to understand guidance about what information we collect about you, where it comes from and how we use it. This privacy notice applies to the use of personal information and other information by c2c. We are committed to applying appropriate security measures to keep your information secure and safe and to only use the information you provide and any other information we may hold about you, for the purposes set out below.

c2c may use and share, with its advisors, applying appropriate security measures to keep your information safe and secure, the information you provide and other information we hold about you for the defined purposes described below.

How we collect your personal information and how we use it.

Where c2c does request your personal information, in all cases we only request information which is necessary to provide you with the c2c services you have requested. With a few exceptions, the personal information we collect is limited to the sort of information we require to facilitate use of our various services, like; name, last name, home address, phone and or/ mobile number, date of birth and payment card information. We use this information to provide customers with our transportation and ticketing services. We do not sell personal information to anyone and only share it with third parties who are facilitating the delivery of c2c's services. If you are aged 13 or under, please get your parent or guardian's permission before you provide any personal information to us. Users without this consent are not allowed to provide us with personal information.

[Learn More](#)

In addition to using your information for the purposes mentioned in this Privacy Notice, we may also use your personal information to monitor, improve and protect our products and services, work with our agents and business partners to improve the products and services we offer and to develop new products and services.

1. c2c website

You can browse the c2c website without disclosing any information about yourself.

Where we do request information from you, it is only information which we need to provide you with the service(s) you have requested. By entering your details in any fields requested, such as your name, email address, postal address, telephone or mobile number, or date of birth, you enable c2c to provide you with the service(s) you select and for market research, which allows us to understand how to provide a better service for all customers.

Also, as with most other websites, the c2c website collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other information about your visit, including the full URL to, through and from our site, tickets and/or journeys you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. We use this information to help us design our site to better suit our customers' needs.

We may also use your IP address, identification number, online identifier, operating system, browser information, location data and other similar identifying information required for your devices to communicate with websites and applications on the internet, including technical information from the devices you use to access c2c products and services to help diagnose problems with our server and to administer our website, analyse trends, track visitor movements and gather broad demographic information that assists us in identifying visitor preferences. Note that many devices will have their own privacy settings and notices under which they may collect your information, so you may wish to check your device settings to get details of such processing.

We will tell you if we would like to send you information about our services or products and give you the choice to opt-in. We will also give you the opportunity to easily opt-out at any time.

The c2c website also uses cookies. Further information on cookies can be found in the cookies section in this Notice.

2. Purchases

You may choose to purchase services through c2c using a payment card. Usually the payment card information is provided directly by the customer on the c2c website, ticket machine or ticket office. We will usually store this information on our payment system for business, fraud and other related lawful purposes.

3. c2c free WiFi and vista onboard entertainment

c2c offers customers the use of free wifi onboard c2c trains and at c2c stations. Registration is required with each device to use the service so we can analyse activity on our network to help block unauthorised or illegitimate content, in the detection and prevention of crimes, responding to statutory obligations or requests from the courts and enforcement authorities.

The personal information we collect includes title, name, email address and information about the device you are using, including IP address and unique identifiers.

4. c2c applications

You can use many of the features of the c2c Live app without the need to sign in. The c2c vista app is only functional when connected to the free c2c onboard WiFi. Some of the features of the c2c applications will require you to sign into a registered c2c account. By entering your details in any fields requested, including your title, name, email address, postal address and mobile number, you enable c2c to provide you with the service(s) you select. The apps may request permission to see your location, photos and videos as well as to take photos and videos with your device, the feature is optional. Denying the app these permissions will only affect your ability to send us pictures and or videos, for example, pictures of our stations which you want to bring to our attention.

5. Your communication with c2c

If you correspond with c2c by telephone, email, post, social media and other forms of correspondence, we may retain the information and use it to respond to your inquiry and/or keep a record of your query and/or complaint. We may also request information in order to help with your query, including name, email address, postal address, home or mobile number and c2c Smartcard number.

6. Secure Cycle Fob Scheme

Registering for the Secure Cycle Fob Scheme is optional. Should you choose to take advantage of this c2c service will collect your full name, address, telephone number and email address. This is strictly used to provide you with the service.

7. Priority Seat Badges

c2c offers a service to provide customers with “Priority Seat Badges”. To ensure that only customers in need of this service are able to use it, if you request the service, in addition to the usual information, we may request sensitive personal medical information to assess whether the service is appropriate for you.

8. Loyalty scheme, competitions, promotions and surveys

c2c offers loyalty schemes, promotions and may at times ask you to take part in surveys. By providing your information, including name, email address, postal address, home or mobile number you enable c2c to provide you with the loyalty scheme, promotions and/or survey you select.

9. c2c Smartcard

Although Flexi-Season and student discounted tickets are only available on a c2c Smartcard, travelling on c2c does not require a Smartcard. Should you choose to register for a Smartcard, it is entirely optional. If you choose to register for a Smartcard, by entering your details in any fields requested, such as your name, email address, postal address, telephone or mobile number, or date of birth, you enable c2c to provide you with the c2c Smartcard service. The c2c ticketing system records information about your journey including the location, date and time a c2c Smartcard is used, to validate a journey.

10. Recruitment

Information you provide us through the recruitment process including references, results of pre-employment screening, employment history, relevant experience, achievements, skills and qualifications, equalities monitoring information (if required), the outcome and results of any interviews or tests (which are part of the recruitment process) and any other information you provide us in the context of the recruitment process (e.g. proof of right to work in the U.K.). The information provided enables c2c to consider you for the recruitment process.

c2c and the companies that process recruitment related information on our behalf, will use your personal information for the purposes of recruitment, including to evaluate your application and assess your suitability for the role in question, make a decision about whether you should be selected for interview and appointment, conduct relevant pre-employment screening (e.g. carry out criminal record checks; verify your address, academic qualifications and work experience), review and audit the recruitment process and its outcomes, carry out equalities monitoring activities (with your consent) and identify any future employment opportunities which may be of interest to you.

Your information will only be accessed and processed by authorised personnel, including recruiting line managers, HR professionals and occupational health professionals, who are directly involved in the management and administration of the recruitment process and have a legitimate need to access your personal information.

11. CCTV Systems

Our CCTV systems, including Body Worn Cameras (BWV) and Automatic Number Plate Recognition (ANPR), at our stations, premises and on our trains, are used to capture and monitor images of events that take place in specific locations in real time. The images may also be recorded on a computer hard drive or other type media storage device. Cameras may be focussed on a fixed location, set to scan a particular area, or they can be operated remotely by specially trained operators. Some c2c employees are issued with BWV, for example, c2c Revenue Protection Inspectors. These devices are able to capture audio recordings as well as images. The cameras are clearly visible and only switched on in the event of an incident (for example the member of staff being subjected to verbal abuse or threats of violence). c2c owned or operated parking areas may have mobile ANPR cameras fitted in cars capturing number plate data to enforce parking restrictions.

12. Delay Repay

Where you choose to provide c2c with your information for a Delay Repay claim, either by filling out a delay repay form online, in person or by registering for Automatic Delay Repay with your Smartcard, we will use the information provided for the purpose of providing this service to you and where necessary, for fraud prevention purposes. Typically, this information will include your

purchase details, journey details, bank statement or receipt, name, address, email address and signature.

13. Ticket Offices

Where we collect your personal information at ticket offices, it will be because we need your information so that we can provide you with the product and service you are purchasing, confirm your eligibility for certain schemes (e.g. Priority Seat Badges), notify you about changes to our service, produce tickets, process payments or confirm orders, alert you about your booked journeys and process automated delay refunds (Delay Repay).

14. Third Parties

We may hold personal information about you that has been provided to us by other train companies and other companies. All third parties will have obtained your permission to share your information with us for the purposes for which the information was collected.

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Sharing personal information

Information about purchases and use of our services are stored in association with your c2c account. The personal information which c2c collects about you is stored in one or more data bases hosted by us and by third parties located in the UK and the EU.

[Learn more](#)

c2c has contracts with some third party service providers, who provide the administration and 'back office' services that ensure the efficient day-to-day operation of our services, products as well as for out recruitment and selection process. Therefore the information you provide may be shared with these third parties for the purposes of providing you with our services and products. Where you have provided us your personal information in the application of a job role with c2c we may also share you information with third parties for employment assessment and to carry out pre-employment screening, like obtaining references from previous employers, or requesting a Disclosure and Barring Service check. In all cases, these third parties will only process applicant information in accordance with c2c's instructions and make decisions regarding the information as part of the delivery of their services; they are also required to put in place appropriate security measures that ensure an appropriate level of protection for personal information.

We may disclose your personal information to train operating companies with whom we share stations, including TfL, London Overground, Arriva and Greater Anglia, where you use your c2c Smartcard to tap in and/or out on their gates. We may also disclose your personal information to them for ticketing and information services.

In some circumstances, c2c may disclose your personal information to the police and other law enforcement agencies) if it is necessary for the prevention or detection of crime and/or the apprehension or prosecution of offenders. Each police request to c2c is dealt with on a strictly case by case basis to ensure that any such disclosure is lawful, proportionate and that we are legally obliged to do so.

Only when necessary, c2c may also disclose your personal information to other third parties in order to defend c2c's legal rights, or in an emergency where the health or personal security of an applicant is at risk.

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Keeping your personal information secure

c2c takes the privacy and trust of customers, job applicants and employees very seriously. We have a range of robust policies, processes and technical measures in place and maintain physical, technical and administrative safeguards to protect your personal information.

[Learn more](#)

Access to systems that hold personal information is restricted to authorised personnel, who need to know that information to provide you c2c services or products, through the use of unique identifiers and passwords. Your personal information is stored on systems that are protected by secure network architectures and are backed-up on a regular basis (to a second secure location) for disaster recovery and business continuity purposes; and to avoid the risk of inadvertent erasure or destruction.

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Transferring personal information outside the EU

c2c collects and transfers personal data outside the EU only: with your consent; to perform a contract with you; or to fulfill a compelling legitimate interest of c2c in a manner that has been carefully considered to not outweigh your rights and freedoms. c2c only does so under the contractual protections afforded under Standard Contractual Clauses for data transfers between EU and non-EU countries. This is to ensure that suitable safeguards to protect the privacy and security of your personal information is applied and to use it only consistent with your relationship with the c2c and the practices described in this Privacy Notice.

Data storage and retention

Your personal data is stored by c2c on its servers in the UK, and on the servers of the cloud-based database management services that c2c has contracted with. Some of the cloud servers are located outside the EU, however, in all cases the information is safeguarded through Standard Contractual Clauses for data transfers between EU and non-EU countries. c2c will only retain your personal information data for as long as is necessary, including for any relevant legal retention requirements. We will securely destroy the information once it is no longer necessary to retain it. For more information on where and how long your personal data is stored please contact us DPO@c2crail.net.

Data subject rights

Under the data protection law, you have rights we need to make you aware of. The rights available to you depends on our reason for processing your information.

- your right to access a copy of the personal information we hold about you;
- your right right to rectification of inaccurate personal information we hold about you;
- your right to restrict our use of your personal information;
- your right to erasure, be forgotten;
- your right to data portability; and
- your right to object to our use of your personal information.

Where we rely on consent as the legal basis on which we process your personal information, you may also withdraw that consent at any time. If you are seeking to exercise any of these rights, please contact us at DPO@c2crail.net.

You are not required to pay any charge for exercising your rights. We normally have one month to respond to your request. Please note that we will need to verify your identity before we can fulfill any of your rights under data protection law. This helps us to protect the personal information belonging to our customer against fraudulent requests.

This Privacy Notice is intended to provide you with information about what personal information c2c collects about you and how it is used. If you have any questions, please contact us at DPO@c2crail.net.

Data Protection Officer

c2c has appointed a Data Protection Officer to ensure we protect personal data of our customers & others and comply with data protection legislation.

If you any questions about how c2c uses your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact our Data Protection Officer:

Our DPO: Andy Stewart-Wright

Email: dpo@c2crail.net

Phone: 0330 109 8130

Write to: Data Protection Officer, Trenitalia c2c Limited, 2nd Floor, Cutlers Court, 115 Houndsditch, London EC3A 7BR

You have the right to lodge a complaint with the Information Commissioner's Office. Further information, including contact details, is available at <https://ico.org.uk> or call 0303 123 1113

Cookies Notice

As is true of most other websites, c2c's website collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the use of c2c's website, including a history of the pages you view. We use this information to help us design our site to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyse trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences. The c2c website also uses cookies and web beacons. c2c may track you when you cross from the c2c website to third party websites, to provide you with targeted advertising.

[Learn more](#)

You should be aware that when you use our content products and services, we may collect information from the devices you use to receive c2c content, products and services by using 'cookies'. We also collect such information from third party websites, mobile sites and from apps where we show our own adverts, using cookies and related ad technology.

If you'd like to learn how to manage these cookies and choose whether or not to receive information of different types, please see the section "controlling my cookies" below.

1. So what are cookies?

Cookies are small bits of text that are downloaded to the devices you use to receive c2c products and services and to access online information. Your browser makes these cookies available every time you visit the website again, so it can recognise you and can then tailor what you see on your device.

2. How do we use cookies?

We use cookies to provide the content, product or service you have asked for. Some of these cookies are essential to help your devices download or stream the information, or so you can move around websites and use their features. Without these cookies, content, products or services you've asked for can't be provided.

Here are some examples of essential cookies:

- Positioning information on a smartphone screen, tablet or other screen, so you can see the website and use its functionality.

Keeping you logged in during your visit or enabling you to stream content; without cookies you might have to log in on every website you visit or repeatedly adjust your volume and viewing settings.

When you add something to an online shopping basket, cookies make sure it's still there when you get to the checkout.

We use cookies to improve your browsing experience. These cookies allow our application or website to remember choices you make and they provide improved features. For example:

- Remembering if you've filled in a survey, so you're not asked to again.

- Remembering if you've been to the application or website before.

- Restricting the number of times you're shown a particular advertisement (frequency capping).

- Showing you information that's relevant to content, products or services that you receive.

We use cookies for analytics. We like to keep track of, for example, what information and links are popular and which ones don't get used as much. This helps us keep our information relevant and up to date. It's also useful to be able to identify trends of how people find their way through our information as well as when and where an error message may originate from.

Analytics cookies are used to gather this information. The information collected is grouped with the information from everyone else's cookies. We can then see the overall patterns of usage rather than any one person's activity. These 'analytics' cookies are used to improve how an application, a website and its pages work.

The c2c website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of the website and compile reports for us on activity on the website.

Google stores the information collected by the cookie on servers outside the EU. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using the c2c website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Our applications, web locations, website and communications you get from us can contain small invisible images known as 'web beacons' or 'pixels'. These are used to manage the interaction between you and the online information or email and allows us to assess the effectiveness of the communication.

We also use affiliate cookies. Some of our web based information will contain promotional links to other companies' sites, for example on vista. If you follow one of these links and then register with or buy something from that other site, a cookie is used to tell the other site that you came from on our

sites. That other site then may pay us a small amount for the successful referral. The [Internet Advertising Bureau](#) provides a helpful guide on how affiliate marketing works.

3. How we show advertising and marketing that is relevant to you

We sell space on vista, our onboard entertainment system. The adverts will often contain cookies and related ad technology which is placed by third part partners, for example, ad servers, ad agencies, ad network providers and research firms. These partners use the browsing information collected from these cookies to:

- Put a limit on the frequency in which you see the same ad (frequency capping).

- Help show other advertisements that are relevant to you while you're using vista. The information about your browsing activity may be grouped with information about what is being accessed by other users, into interest groups, and then used to show you advertisements based on those interests. This is often referred to as Online Behavioural Advertising (OBA).

4. We won't sell your personal information collected from cookies

We don't sell personal data collected from cookies to any other organisations. If you want to know about data collected by third parties when you click on their adverts, we encourage you to check their privacy notice/policy to get more information.

It's also easy to manage your cookies if you want to, for example, choosing not to receive behavioural advertising.

5. Controlling your cookies

How to see and manage cookies through your browser

All modern browsers will allow you to see what cookies you have, as well as allowing you to clear them individually or to clear them all. For detailed info on how to do this, aboutcookies.org provides in depth information and steps.

How to choose not to receive OBA and other tracking Cookies

Your browser will offer a variety of tools to help you understand and apply choices over online behavioural advertising.

There are also other ways you can choose not to receive online behavioural advertising and other tracking cookies. You can go to youonlinechoices.com for more information, tips and guides on this.

6. List of Cookies we use

To view the cookies for the c2c website please select the Cookie Preferences link at the bottom of any webpage and select “show details” to manage your preferences directly. You can also view the full list of cookies we have with relevant third parties here:

[View relevant third party cookies](#)

Changes and updates to this Privacy Notice

As c2c and its services and products change from time to time, this Privacy and Cookies Notice can be expected to change as well. We reserve the right to amend the Privacy and Cookies Notice at any time, for any reason, without notice to you, other than the posting of the amended Privacy and Cookies Notice at this Site. We will, however, make all reasonable endeavours to notify you of any changes, including by posting a notice banner advising of any material changes on our website. We may also e-mail periodic reminders of our notices and will e-mail registered c2c customers of any material changes. Nevertheless you should check here regularly to see the current Privacy and Cookies Notice that is in effect and any changes that may have been made to it.

Contacting c2c about this Privacy and Cookies Notice

If you wish to make a complaint about how we use your information, please contact us at dpo@c2crail.net or contact@c2crail.co.uk and we'll do our best to help. However, if you are still unhappy, you can contact the Information Commissioners Office from their [website](#).

[Learn more](#)

For any questions or comments about this Privacy and cookies Notice or requests regarding the information we hold about you, please write to Data Controller - Trenitalia c2c Limited, 2nd Floor, Cutlers Court, 115 Houndsditch, London, EC3A 7BR or by contacting DPO@c2crail.co.uk.

Please also be sure to notify us of any updates, amendments and corrections to your information by contacting us at contact@c2crail.co.uk.

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