

Rail Customer Experience Transition Survey Joint Privacy Notice

This privacy notice was last updated on 02.03.2026.

Introduction

Network Rail Infrastructure Limited (**NR**) and ATOC Limited (which uses the trading style “Rail Delivery Group”) (**RDG**) (RDG is the industry body that acts on behalf of train operating companies) (together, **we, us or our**), are undertaking surveys to research and better understand passengers’ experience of rail journeys.

Your participation in this study is entirely voluntary and the survey will be carried out according to the Market Research Society Code of Conduct.

The privacy and security of the personal data collected from you as part of this research is a priority for us. We are committed to being transparent about the ways in which we intend to use your personal data. This privacy notice describes the nature of the personal data that we collect, use and otherwise process about you in connection with this survey.

Who are we and how to contact us

NR and RDG act as joint controllers under UK GDPR for all processing of your personal data in relation to this survey.

- Network Rail Infrastructure Limited (Company number 02904587) whose registered office is at Waterloo General Office, London, United Kingdom, SE1 8SW. Data Protection Officer data.protection@networkrail.co.uk
- ATOC Limited (company number 03069033) which uses the trading style “Rail Delivery Group” registered office is at First Floor North, 1 Puddle Dock, London, England, EC4V 3DS (RDG). Data Protection Officer lhastie@grcilaw.com.

To keep things simple, whatever our position under data protection law, you can use the same contact details for any questions or requests you have in relation to data protection and our use of your personal data. We will make sure these requests get to the right place.

If you would like to contact us about this privacy notice or our privacy practices, please contact us at rcxs@networkrail.co.uk.

What personal data will we collect about you?

As part of this survey (including any surveys that are partially completed by you), we may collect and use the following personal data about you:

- Email address;
- Phone Number
- Name
- Postcode;
- Age;
- Gender;
- Working status;
- Transport usage;
- Origin and destination station;

- Journey and ticket details;
- Technical information obtained from cookies, web beacons, scripts, eTags, local storage (HTML5) including mobile device ID, internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website and the survey.

We may also collect special categories of personal data about you. Special categories of personal data are types of personal data that are sensitive and require extra protection under the UK GDPR. We will only collect details about your race or ethnicity and health information, in particular information about any disabilities you may have where you choose to provide this information as part of the survey.

Please do not include personal data in the free text responses to the survey. If personal data is included, we will take reasonable steps to identify and delete this information.

We will also process and share anonymised data that originates from your responses to the survey. Please note that personal data is considered anonymised once you can no longer be identified based on the information. We will anonymise your personal data by removing specific identifiers (such as email address, phone number, name and postcode). Anonymised data is not considered personal data under data protection law.

For what purposes will your personal data be used?

Your personal data will be used by us for the following purposes:

- To inform and monitor improvements in rail services and passenger experience;
- To understand trends and patterns in passenger feedback and behaviour;
- To ensure comprehensive data analysis and improve the effectiveness of our survey methodologies;
- To monitor our performance over time, and to allow a greater understanding of the influences on customer satisfaction;
- To seek to ensure that our services take account of passengers' needs – including in regards equality and fairness;
- To inform and formulate commercial strategy and policy (including pricing);
- Plan for the future of the railway including policy and strategy;
- For academic, scientific or historical research purposes and statistical purposes;
- To operate the survey questionnaire software and data collection process;
- To contact you to collect your responses to this survey; and
- To manage and administer the survey and for internal operations including trouble-shooting, security purposes and testing purposes and to determine the effectiveness of the site/tools/services and improve the security and optimisation of the network, sites and services.

We will use both completed and partially completed survey responses for these purposes. By partially complete, we mean if you exit the survey without completing all the questions, we will still receive and process all questions that have been responded to even if the full survey is incomplete.

What is our lawful basis for processing your personal data?

In respect of each of the purposes for which we use your personal data, the UK GDPR requires us to ensure that we have a "legal basis" for that use.

The lawful basis NR rely on are:

- Legitimate interests such as where required to administer the survey and for internal operations including trouble-shooting, security purposes and testing purpose; or
- Performance of a task carried out in the public interest.

Where we are using special category personal data about you, we are required to rely on an additional condition to process that personal data. We process your special category personal data on the basis of the following conditions:

- Substantial public interests where required for statutory and government purposes;
- Substantial public interests where required for equality of opportunity or treatment; or
- Where required for scientific or historical research purposes or statistical purposes.

The lawful basis RDG rely on are:

- Legitimate interests such as where required to operate the survey, analyse responses, understand trends and patterns, inform and plan future policy, administer the survey and for internal operations including trouble-shooting, security purposes and testing purposes.

Where we are using special category personal data about you, we are required to rely on an additional condition to process that personal data. We process your special category personal data on the basis of the following conditions:

- Substantial public interests where required for equality of opportunity or treatment; or
- Where required for scientific or historical research purposes or statistical purposes.

When will we disclose your personal data?

We will use Potentia Insight Ltd and their partner InsightX (independent research agencies) to collect responses to this survey and to manage / administer the prize draw which will involve the collection of your personal data. Potentia Insight Ltd act as a processor on our instructions when collecting survey responses and are required to meet appropriate standards when processing your personal data. Potentia Insight Ltd will act as independent data controller when operating the prize draw and their own privacy notice will apply. Please contact Potentia Insight Ltd directly for further information on how they process your personal data in connection with the prize draw.

Your personal data may be shared if it is made anonymous, as in such circumstances the information will cease to be personal data and cannot be used to identify you. We will share anonymised data with:

- Other organisations in the rail industry, including train operating companies and Transport Focus to inform improvements in rail services and passenger experience. Please note we will not share your email or postcode with these third parties.

- Other third-party organisations that may use the information for academic research purposes, such as universities and government bodies (such as Department for Transport). Please note we will not share your email or postcode with these third parties.

In addition, your personal data will be shared with:

- Third parties who will also process your personal data on our instructions. These include research agencies, IT suppliers (including website, software and app providers), cloud hosting providers, professional advisors, database providers, backup and disaster recovery specialists and email providers.

Our suppliers and service providers will be required to meet appropriate standards on processing information and security when processing your personal data. The personal data we provide them, including your personal data, will only be processed in connection with the performance of their function. They will not be permitted to use your personal data for any purposes other than those outlined in this Privacy Notice.

Anonymised and aggregated data, which has been processed to remove all personal identifiers, may also be made available to the general public and other organisations. This ensures that the information cannot be linked to you and is no longer your personal data. This ensures that we protect your privacy while enabling the sharing of valuable insights and trends with a broader audience.

Security and the processing of your personal data

We have strong security measures in place to protect your personal data and responses. Our security procedures are regularly reviewed to ensure that they are up to date and effective.

We will not transfer your personal data outside of the UK and European Union.

How long will we use your personal data for

Your personal data will be kept securely by us until the end of our retention period (as set out below). After this period, we will anonymise your personal data (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.

Email address, phone number and name collected as part of the survey will be deleted after 6 months. Postcodes and other personal data collected as part of the survey will be retained for 12 months. After this period, the responses will be anonymised.

Your rights

Under the UK GDPR, you have the following rights in relation to your personal data:

- **Your right of access** - You have the right to ask us for copies of your personal data.
- **Your right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete personal data you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.

- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

We may amend this privacy notice from time to time.

If you wish to exercise any of the rights set out above, please contact us at rcxs@networkrail.co.uk.

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

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

We try to respond to all legitimate requests within one month. Occasionally, it could 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.

We would welcome addressing any concerns you may have about our handling of your personal data; however, you also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the data protection regulator in the UK (www.ico.org.uk).