

# **RNE PRIVACY POLICY**

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**(version 1.2 as of 01.01.2025)**

## Introduction

Your privacy and trust are important to us. This Privacy Policy (“Policy”) provides important information about how RailNetEurope (“RNE,” “we,” or “us”) handle personal information. This Policy applies to any RNE website, application, product, software, or service that links to it (collectively, our “Services”). It is based on the terminology used by the [General Data Protection Regulation \(GDPR\)](#) and the Austrian Data Protection Act ([Bundesgesetz über den Schutz personenbezogener Daten \(Datenschutzgesetz 2000 – DSG 2000\)](#)).

We want to be clear about our privacy practices so that you can make informed choices about the use of your information. Please read this Policy carefully and contact our [Data Protection Officer](#) if you have any questions about our privacy practices or your personal information choices. It is important that you check back often for updates to this Policy. If we make changes, we consider to be important, we will let you know by placing a notice on the relevant Services and/or contact you using other means of communication such as sending an email message.

As it is a living document, we may revise this Policy from time-to-time, and your comments and contributes are welcome. The revised version will apply from the date of the publication of the revised policy on our website. Please check the RNE website regularly to ensure you are familiar with the current version.

This Policy was last updated on 1 January 2025.

## Personal information

RNE is committed to the responsible handling and protection of personal information. Personal information means any information relating to an identified or identifiable natural person.

We collect, use, disclose and store personal information when needed to provide our Services and for our operational and business purposes as described in this Policy.

## The types of personal information we collect

We collect personal information from you, for example, if you register in our IT tools, register for an event (e.g. meeting, conference, workshop, etc.), request information, or request user support. We may ask you to provide information such as your name, email address, phone number, username and password. In addition, as we offer strictly professional railway-related IT applications in Europe we may ask information about the name and type of your employer (e.g. infrastructure manager (IM), allocation body (AB), railway undertaking (RU), terminal operator, etc.) and your language preferences. Not all of the personal information RNE holds about you will always come directly from you. It may, for example, come from our members (e.g. IMs, ABs, rail freight corridors), your employer (e.g. IM, RU, terminal), other organizations, bodies and authorities we are in cooperation with (e.g. associations from the railway sector, European Commission, European Union Agency for Railways, etc.). In addition, our servers, logs, and other

technologies automatically collect certain information to help us administer, protect, and improve our Services; analyse usage; and improve users' experience.

We may provide the possibility to upload your portrait picture in some of our IT systems (e.g. MS SharePoint). We may also need to publish your pictures taken on some of our events. You will be explicitly asked to consent to this and with the submission of your registration we consider you agree and give an explicit consent on the above usage of your pictures in our applications, website/s, printed materials (e.g. brochures) and social media (e.g. RNE's LinkedIn page).

For the sole purpose of taking coherent minutes of meetings we may record some of our groups' and decision-making bodies' (i.e. Managing Board and General Assembly) meetings when they are held online (e.g. via Microsoft Teams). The recording and/or transcriptions will be subject to the participants' explicit prior consent and kept in the RNE Joint Office cloud or the cloud of our providers (e.g. Microsoft) until the minutes of the meeting are approved. The participants and their substitutes or relevant colleagues within their company may request to access the recording and/or transcription.

For training purposes or to promote our activities, we may record video of some of our internal and external meetings for distribution to our members and/or various stakeholders and for online publication (e.g. RNE website). As participants are asked to turn off their cameras and mute their microphones, your face and voice will not normally be recorded, unless it is a question-and-answer session or similar. In all cases, you will be explicitly asked to consent to this processing.

We do not collect and process any data that may be considered sensitive personal information (e.g. racial/ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, other medical information including biometric and genetic data, sexual life, etc.)

### **How we use personal information**

We process personal information for these Service- and business-related purposes:

- Project management and decision making: We use personal information such as your name and company email address to organise meetings, send out agendas and minutes of meetings, conduct opinion gatherings in RNE groups, hold online meetings, vote in the RNE General Assembly, etc. In these situations, and given the limited number of participants, mainly from our members and business partners, we usually address people collectively and do not use the Bcc functionality of the MS Outlook and MS Teams.
- Account setup and administration: We use personal information such as your name, email address, phone number, and information about your employer to set up and administer your account, provide technical and customer support and training, verify your identity, and send important account, subscription, and Service information.
- IT System-related notifications: We use your email address to send messages relating to newsletters, new deployments, versions, system specific functionalities, etc.

- Mobile applications: We may have mobile applications for tracking of trains (e.g. TIS app for train drivers). In these cases, no personal data of users is being processed, only the location and movement of trains.
- Event management: We use personal information to deliver event communications to you across various platforms, such as email, telephone, and online. If we send you such an email (e.g. an invitation for event registration), it will include instructions on how to unsubscribe from receiving these emails in the future. Please note that even if you opt out of receiving invitation emails, we may still send you important Service information related to your account in particular IT system.
- Sales management: We may use your personal information in presenting our IT services and data to your company or organisation. In this regard we do not send unsolicited offers.
- Newsletters: We may use your email address for RNE newsletters. These will be sent using a bulk email tool (e.g. Mailjet) in a blind setting, so you will not see the other addresses and they will not see you.
- Surveys and polls: If you choose to participate in a survey or poll, any personal information you provide will only be used internally and not for marketing or market research purposes.
- Pilots: We may use your personal information for our pilot projects (e.g. test account) and to improve and test the features and functions of our IT systems.
- Content management: Some of our Services provide content management and document storage as an integral part of the software product (e.g. Microsoft SharePoint). Documents and data stored by us in the RNE Joint Office (JO) and our members in Microsoft SharePoint maintained by RNE may contain personal information. Any information stored by or on behalf of our members and users is controlled and managed by and only made accessible to those members and users. Our access to this information is limited to the RNE JO personnel with a critical business reason, such as project management activities, technical support or invoicing.
- Legal obligations: We may be required to use and retain personal information for legal and compliance reasons (e.g. rail regulatory body inquiry). We may also use personal information to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate: (a) under applicable laws in Austria; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; (c) to enforce our terms and conditions; and (d) to protect our rights, privacy, safety, or property, or those of other persons.

RNE does not use any technology powered with artificial intelligence online (e.g. chatbots, voicebots, profiling) or offline on RNE premisses to process your personal data.

## When we share personal information

RNE shares or discloses personal information when necessary to provide Services or conduct our business operations as described below. When we share personal information, we do so in accordance with data privacy and security requirements. Below are the parties with whom we may share personal information and why.

- Within RNE Joint Office: Personal information will be made available to the JO employees if necessary for the provision of Services, such as sales, invoicing, customer and technical support, project management. All our employees are required to follow our data privacy and security policies when handling personal information.
- Our members: We partner with our members to manage projects, events and meetings (e.g. RNE General Assembly meeting, working groups meetings, etc.). As part of these arrangements, we and our members may collect and share information about you with us and vice versa.
- Our business partners: We occasionally partner with other organizations to manage projects, or to host trainings, events and conferences. As part of these arrangements, you may be a partner of both RNE and our partners, and we and our partners may collect and share information about you. RNE will handle personal information in accordance with this Policy, and we encourage you to review the privacy policies of our partners to learn more about how they collect, use, and share personal information.
- Our third-party working groups and project leaders: We have chairpersons and project and task force leaders from our members and third parties. All of them are required to follow our data privacy and security policies when handling personal information processed by RNE they have been entrusted with.
- Our customers: We provide a range of IT and data services to the railway sector in Europe. As part of these arrangements, you via your company/employer may be a customer of RNE, and we may collect and share information about you.
- Our third-party IT service providers: We partner with and are supported by IT service providers around Europe. Personal information will be made available to these parties only when necessary to fulfil the services they provide to us, such as software, system, and platform support; cloud hosting services; data analytics. Our third-party service providers are not permitted to share or use personal information we make available to them for any other purpose than to provide services to us.
- Third parties for legal reasons: We will share personal information when we believe it is required, such as:
  - To comply with legal obligations and respond to requests from government agencies, including law enforcement and other public authorities.
  - To protect our rights, users, systems, and Services.

### **Where we process and store information**

All of your personal information is collected and stored on secure servers located in Vienna, Austria or other locations in the European Union (e.g. Microsoft data centres). In exceptional cases, personal data is collected, stored and updated by JO employees for the purposes of mailing lists and project management (e.g. Excel files with members of working groups, task forces, projects). These files may be exchanged between different teams within the JO and with our members. These processing activities are entirely in the context of RNE business and do not breach data protection rules and procedures.

### **How we secure personal information**

RNE takes data security seriously, and we use appropriate technologies and procedures to protect personal information. Our information security policies and procedures are closely aligned with widely accepted international standards and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements.

### **How long we keep personal information**

We retain personal information for as long as we reasonably require it for legal or business purposes. In determining data retention periods, RNE takes into consideration Austrian laws, contractual obligations, and the expectations and requirements of our members and users. When we no longer need personal information for the purposes for which they are kept, we securely delete or destroy it.

### **Your rights**

In principle, you have the rights to information, access, correction, deletion, restriction, data portability and objection in regard to your personal data. We respect your rights, and we will respond to your requests for information and, where applicable, will correct, amend, or delete your personal information.

- **Access to personal information:** If you request access to your personal information, we will comply, subject to any relevant legal requirements, including identity verification procedures (e.g. by asking questions to which only you know the answer). If this is not possible, only then before providing data to you, we will ask for proof of identity (e.g. ID) and sufficient information about your interaction with us so that we can locate any relevant data for you in all our IT systems.
- **Correction and deletion:** You have the right to correct or amend your personal information if it is inaccurate or requires updating. You may also have the right to request deletion of your personal information; however, this is not always possible due to legal requirements and other obligations and factors (e.g. in PCS).

- **Filing a complaint:** If you are not satisfied with how RNE manages your personal data, you have the right to make a complaint to the Data Protection Officer of RNE via email address [dpo@rne.eu](mailto:dpo@rne.eu) and/or the data protection authority in Austria:

### **Österreichische Datenschutzbehörde**

Barichgasse 40-42

1030 Wien

Tel. +43 1 52 152-0

e-mail: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

website: <http://www.dsb.gv.at/>

### **Connecting via social media**

Our Services do not include social networking features, so you cannot use your own social networking logins from, for example, Facebook or LinkedIn, to log into some of our IT systems.

### **Links and connections to third-party services**

In general, our Services do not contain links to third-party apps, services, tools, and websites that are not affiliated with, controlled, or managed by us. However, if this is the case the privacy practices of these third parties will be governed by the parties' own privacy policies. We are not responsible for the security or privacy of any information collected by these third parties. You should review the privacy policies applicable to these third-party services.

### **Children's privacy**

RNE provides information solutions for professionals only, and our Services are not aimed in whatever way at children.

### **How to contact us**

If you have any questions about this policy or our privacy practices, please feel free to contact us in one of the following ways:

RNE Data Protection Officer:

Email address: [dpo@rne.eu](mailto:dpo@rne.eu)

Postal address:

RailNetEurope

Attn: Data Protection Officer  
Jakob-Lind-Straße 5  
Austria Campus 3  
1020 Vienna  
Austria