

# NTRAK Privacy Policy

## Policy Coverage

This Statement of Privacy applies to the NTRAK Modular Railroading Society, Inc. website [www.ntrak.org](http://www.ntrak.org), T-TRAK website [www.ttrak.org](http://www.ttrak.org), and their membership/customer data. All references to NTRAK refer to NTRAK Modular Railroading Society, Inc., [ntrak.org](http://ntrak.org) and [ttrak.org](http://ttrak.org). The NTRAK and T-TRAK websites contain links to other websites and NTRAK encourages you to review their privacy statements on their websites. NTRAK is not responsible for the privacy statements or other content on websites outside of the NTRAK websites.

## Collection of your Personal Information

NTRAK does not collect personally identifiable information from visitors to our websites. To enable purchases of products for sale, we do collect and store personal information in the United States of America separate from the websites. All financial information used in purchases through the websites including billing and credit card information is handled by a third party. The information we do collect is used for fulfillment of the order.

NTRAK may collect personal information from users in connection with voluntary surveys. Data may be collected on the NTRAK websites or through mail. The information provided in answers to optional survey questions may be shared, but only in the aggregate with outside parties unless notification is given at the time of collection.

Information about your computer hardware and software may be automatically collected by NTRAK. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the NTRAK websites. Neither analytics tools (like Google Analytics) nor cookies are used on the websites.

In terms of the General Data Protection Regulation (GDPR) 2016/679 of the European Union, NTRAK is both controller and processor of personal data, with the payment processors (as of May 2018, PayPal [www.paypal.com](http://www.paypal.com) for online orders, Wells Fargo [www.wellsfargo.com](http://www.wellsfargo.com) for check handling) being additional processors, limited to individual transaction information and operating under their own posted privacy policies.

We do not use and do not collect sensitive personal data, i.e., data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

## Security of your Personal Information

NTRAK keeps personal information from unauthorized access, use or disclosure by storing it in a secure location separate from the websites and not accessible from the Internet. Backups are kept locally on removable storage and expire after a few months. We point out that internet-based data transfer is not fail-safe, so a perfect end-to-end protection against access by third parties is not possible.

### **Children Under Sixteen**

NTRAK does not knowingly collect personally identifiable information from children under the age of sixteen. If you are under the age of sixteen, you must ask your parent or guardian for permission to use this website.

### **E-Mail Policy**

NTRAK does not sell or distribute personal information, including email addresses of members or customers, to any other organization or commercial entity.

NTRAK will on occasion send out notices to members and customers who have agreed to receive such notices including information about the Society, notices regarding publications and surveys.

### **Submitting Requests**

Members may submit a request to be removed from the e-mail list or for other actions as listed below by sending the request to the Company Store which maintains the list.

All requests may be sent to: [order@ntrak.org](mailto:order@ntrak.org) by e-mail or may be sent in writing to:

NTRAK, Inc.  
1421 Trowbridge Street  
Garland, TX 75044  
USA

In accordance with the European GDPR, your rights include:

- ***Right to be informed:*** We let you know what data we have, through this policy and other means. If you initiate contact through an order, the data you provide at that point, except for some specifics of the payment information (in particular credit/debit card information), will constitute the set of data we use and store. Additional transactions may generate additions to the stored data. We will also let you know about data breaches should any occur and about related mitigation that we initiate.
- ***Right of access:*** Ask for and receive a listing of your personal data that we have.
- ***Right to data portability:*** Ask for and receive an electronic copy of your data in a portable format (which would be comma separated variables in a text file).
- ***Right of rectification:*** Ask us to correct any errors in your data.

- ***Right of erasure / right to be forgotten:*** Upon request, we will remove your data from our database. Backups expire within a few months, making erasures from the member/customer database permanent. While we have to retain transaction information (e.g., for tax audits), basically in the form of electronic copies of purchasing slips, we do not and will not ever retrieve personal information from those for any purpose unless we are obliged to by law.
- ***Right to restrict processing:*** Any processing beyond immediate order fulfillment occurs only with your agreement, given by an explicit opt-in choice of yours. You can withdraw this permission at any time.
- ***Right not to be subject to automated decision-making:*** We do not perform any such data processing.

### **Changes to this Statement**

NTRAK will occasionally update this Statement of Privacy to reflect company and customer feedback. NTRAK encourages you to periodically review this Statement to be informed of how NTRAK is protecting your information.