

# WFTR Car Club – Data Protection Policy Statement



WFTR car club needs to collect and process certain personal data (information) about its members.

To comply with the General Data Protection Regulation (GDPR), this information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this, we comply with a number of Data Protection Principles, which are set out in the Data Protection Act 1998 ("the Act").

This data protection policy statement sets out our club's commitment to protecting personal data and how we implement that commitment when collecting and using club member's personal information. Our data protection policies and procedures work within and are cognisant of those parameters, guidelines and processes adopted from time to time by the TR Register.

## **(1) WFTR will:**

- comply with the eight data protection principles as listed in (2) below.
- meeting our legal obligations as laid down by the Data Protection Act 1998.
- use collected data fairly and lawfully.
- process personal data only in order to meet the club's needs or fulfil legal requirements.
- take steps to ensure that personal information is up to date and accurate.
- establish appropriate retention periods for personal information.
- ensure that data subjects' rights can be appropriately exercised.
- provide adequate security measures to protect personal information.
- Nominate a WFTR committee member to be responsible for data protection compliance and provide a point of contact for all data protection issues.
- delete personal information after it has served the purpose for which it was gathered.
- make all WFTR committee members are aware of good practice in data protection.
- deal with data protection queries from members promptly and effectively.
- regularly review data protection procedures and guidelines within the club.

## **(2) WFTR comply with the following data protection principles:**

- Personal data shall be processed fairly and lawfully.
- Personal data shall be obtained for one or more specified and lawful purposes and shall not be processed in any manner incompatible with that purpose or purposes.
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998.
- Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of and damage to, personal data.
- Personal data shall not be transferred to a country or territory that does not have the same level of data protection.

## **(3) WFTR collect and securely record the following personal information:**

- TRR membership number and type.
- Members full name including initials and title, members postal address, members phone number(s) if provided.
- Members email address if provided.
- Name(s) and contact details of any family member(s) over the age of 18 years, if provided by the member with the individuals prior agreement
- Members attendance at WFTR organised Events.

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- Members classic car details if provided.
- Members payments for WFT organised Events.
- Personal event images provided by members to WFTR.
- Club night attendance statistics.

### **(4) WFTR will process this information to:**

- Keep members informed of WFTR activities.
- Register members on WFTR organised events.
- Organise WFTR member Events.
- Publish member supplied images to the WFTR website gallery.
- Facilitate the day-to-day running of the car club.
- Record the personal information of members received from the TRR office in respect of an individual's membership.
- Respond to requests for members' personal information received from the TRR office pursuant to the effective management of the club.
- Canvas the membership to solicit feedback regarding the running of the club and its programme of events and activities.
- Issue bulletins and newsletters to members.

### **(5) Processing members personal information**

WFTR will only process personal information if the following qualifications apply:

- The processing is necessary in the legitimate interest of the TR Register and/or WFTR car club and for the coordination and management of the supported events and activities.
- or
- The processing is necessary for compliance with a legal obligation to which the data processor is subject.

### **(6) Sharing members personal information**

Data is captured on a legitimate interest only basis either directly from the TR Register who provide the information to WFTR in a password protected document or directly from the member.

Data may be shared with the TR Register the WFTR Committee members or other WFTR members for liaison purposes on WFTR events/shows etc. We will never share members personal data with other third parties without seeking and gaining their prior permission to do so.

### **(7) Deleting personal information**

Personal information processed for any purpose or purposes will be deleted as soon as practical after it is no longer required for the purpose or those purposes for which it was originally processed and no later than within 28 days. Club membership details will be deleted within 28 days in the event of a member leaving the club.

### **(8) Legitimate Interest**

We have completed a detailed assessment (LIA) encompassing the current and historical practices in obtaining and processing members data, we believe that we have lawful grounds for assuming that we have a legitimate interest. This LIA will be subject to annual review.



### **(9) Accessing your information (Subject Access Requests)**

Members are entitled to ask for a copy of the personal information that we hold about them and to have any inaccuracies in that personal information corrected. This will be completed in 28 days.

A member submitting a request for their personal information is entitled to:

- I. know what personal information we are processing or have processed;
- II. why we have processed members personal information – the reason(s) and purpose(s) for the processing of your personal information;
- III. know if we have shared member's personal information and, if so, with whom and for what purpose(s).

Member requests for personal information must be submitted to the club in writing (email) and addressed to the Membership Secretary [membership@wfr.co.uk](mailto:membership@wfr.co.uk)

### **(10) WFTR member's rights**

Members rights under GDPR are specifically:

- right to be informed;
- right of access;
- right to rectification;
- right to erasure;
- right to restrict processing;
- right to data portability;
- right to object.

### **(11) Links to other websites**

WFTR website may include links to other websites. We are not responsible for the data protection and privacy practices of other organisations, including their website. This Data Protection Policy applies exclusively to WFTR car club.

Windsor Forest TR's Committee members

25<sup>th</sup> May 2018