

## **PRIVACY POLICY**

### **INTRODUCTION**

Welcome to Salopian Drivers Club's Privacy Policy.

The Salopian Drivers Club respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you deal with us and when you visit our website (regardless of where you visit it from), and will tell you about your privacy rights and how the law protects you.

### **1 IMPORTANT INFORMATION AND WHO WE ARE**

#### **Purpose of this Privacy Policy**

This Privacy Policy aims to give you information on how the Salopian Drivers Club (SDC) collects and processes your personal data through your dealings with us and your use of our website, including any data you may provide during such dealings and such use, and in particular when you apply for and become a SDC member and attend and participate at our events & networking, use and order and purchase our products and services.

We do not knowingly deal with children and our website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

#### **Controller**

SDC is the controller and responsible for your personal data (collectively referred to as 'we', 'us' or 'our' in this Privacy Policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

#### **Contact details**

If you have any questions about this Privacy Policy or our privacy practices, please contact our data privacy manager in the following ways:

Name	<b>Mr Miles Preston</b>
Email address	<a href="mailto:members@salopiandriversclub.org">members@salopiandriversclub.org</a>
Address	Severn Hill Lodge, the Schools, Shrewsbury School, SY3 7BA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

#### **Changes to this Privacy Policy and your duty to inform us of changes**

We keep our Privacy Policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### **Third-party links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not

control these third-party websites and are not responsible for their privacy statements. When you leave our website we encourage you to read the privacy policy of every website you visit.

## 2 THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** - Includes your first name, last name and username or similar identifier, and where applicable your SDC membership number.
- **Contact Data** - Includes your home or correspondence address, billing address, delivery address, email address, telephone number and mobile number, and where applicable your SDC membership contact details.
- **Financial Data** - Includes your bank account and payment card details.
- **Transaction Data** - Includes details about payments to and from you, and details of products and services you have ordered or purchased from us.
- **Technical Data** - Includes your internet protocol (IP) address, 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.
- **Profile Data** - Includes your username and password, your attendances and participation at our events & networking, your use and your orders and purchases of our products and services, and your interests, preferences, feedback and survey responses.
- **Usage Data** - Includes information about how you attend and participate at our events & networking, use and order and purchase our products and services, and how you use our website.
- **Marketing and Communications Data** - Includes your preferences in receiving marketing from us and our third parties, and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. For example, if you apply for SDC membership and do not provide us with the necessary information about yourself we may have to reject your application, but we will notify you if this is the case at the time.

### 3 HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions** - You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for (or update or renew) SDC membership; or
  - attend or participate at our events & networking, use or purchase our products or services; or
  - create an account on our website; or
  - subscribe to our service or publications; or
  - request marketing to be sent to you; or
  - give us feedback or contact us.
- **Automated technologies or interactions** - As you interact with our website we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.
- **Third parties or publicly available sources** - We will receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers, advertising networks and search information providers;
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
  - Identity and Contact Data from data brokers or aggregators; and
  - Identity and Contact Data from publicly available sources.

### 4 HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data where:

- we need to perform a contract we are about to enter into, or have entered into, with you; or
- it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests; or
- we need to comply with a legal obligation.

For more details about the types of lawful basis that we will rely on to process your personal data see below:

- **Performance of contract** - Means processing your data where it is necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.
- **Legitimate interest** - Means the interest of our organisation in conducting and managing our operation to enable us to give you the best SDC membership experiences and the best and most secure products and services. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our

interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- **Comply with a legal obligation** - Means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data, although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose or activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To process and manage your SDC membership (including applications, updates and renewals)	Identity Contact	Performance of a contract with you
To process and manage your attendance and participation at our events & networking, your use of our website, and your purchase of our products or services	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you  Necessary for our legitimate interests (to comply with our various duties of care)
To process and deliver your orders for SDC products and services, including the management of payments, fees and charges and the collection and recovery of money owed to us	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you  Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you, which will include notifying you about changes to the terms and conditions of your SDC membership or our Privacy Policy, and asking you	Identity Contact Profile Marketing and communications	Performance of a contract with you  Necessary to comply with a legal obligation

<p>to leave a review or take a survey</p>		<p>Necessary for our legitimate interests (to keep our records updated and to study how SDC members and their guests attend and participate at our events &amp; networking, use and purchase our products or services)</p>
<p>To administer and protect our organisation and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Identity Contact Technical</p>	<p>Necessary for our legitimate interests (for the operation of our organisation, the provision of administration and IT services, network security, to prevent fraud, and in the context of an organisation restructuring)</p> <p>Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you, and measure or understand the effectiveness of the advertising we serve to you</p>	<p>Identity Contact Profile Usage Marketing and communications Technical</p>	<p>Necessary for our legitimate interests (to study how SDC members and their guests attend and participate at our events &amp; networking, use and purchase our products or services, and to develop such interests, to grow our organisation, and to inform our marketing strategy)</p>
<p>To use data analytics to improve the marketing of SDC membership and its benefits, improve the marketing of SDC generally, and in particular our events &amp; networking, and our products and services, improve your SDC membership experience, improve such events &amp; networking, and products and services, and improve the SDC website</p>	<p>Technical Usage</p>	<p>Necessary for our legitimate interests (to define types of SDC members for our products and services, to keep our website updated and relevant, to develop our organisation, and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about our SDC membership benefits, events &amp; networking, , and products or services, that may be of interest to you</p>	<p>Identity Contact Technical Usage Profile Marketing and communications</p>	<p>Necessary for our legitimate interests (to develop our SDC membership benefits, events &amp; networking, and products or services, and to grow our organisation)</p>

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us, and you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **Opting out**

You can at any time ask us or third parties to stop sending you marketing messages by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product or service purchase, warranty registration, product or service experience or other transaction.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5 DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the parties set out below for the purposes set out in the table above:

- third party service providers who provide IT and system administration services;
- third party professional advisers including lawyers, bankers, auditors and insurers who provide legal, banking, accounting, insurance and consultancy services;
- HM Revenue & Customs, regulators and other authorities;
- other third party providers of ancillary services such as fraud prevention agencies and price comparison sites; and

- third parties to whom we may choose to sell, transfer or merge parts of our organisation or our assets. Alternatively, we may seek to acquire other organisations or merge with them. If a change happens to our organisation, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes, and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6 INTERNATIONAL TRANSFERS**

We generally do not transfer your personal data outside the European Economic Area (EEA).

However, should any of your personal data be transferred out of the EEA we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission (*For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries*);
- where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe (*For further details, see European Commission: Model contracts for the transfer of personal data to third countries*); and
- where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US (*For further details, see European Commission: EU-US Privacy Shield*).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **7 DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those officers, employees, workers, contractors and other third parties who have a operational need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8 DATA RETENTION**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about SDC members and customers for our products and services (including Contact, Identity, Financial and Transaction Data) for 6 years after they cease being SDC members or customers for tax purposes.

Where we have been a BLC member or we have provided you with products or services, we will keep information relating to the relevant membership or contract for 7 years after the SDC membership ends or completion of the performance of the contract (or where the contract was executed as a deed for 13 years after completion of its performance), being the 6 year (or where the contract was executed as a deed 12 year) statutory limitation period for breach of contract and tort claims (including negligence) under the Limitation Act 1980, plus 1 year to cover potential claim administration and process.

In some circumstances you can ask us to delete your data. For further information see your legal rights below.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, and in which case we may use this information indefinitely without further notice to you.

## 9 YOUR LEGAL RIGHTS

### Your rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- **Request access to your personal data (commonly known as a 'data subject access request')** - This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you** - This enables you to have any incomplete or inaccurate data we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data** - This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** – This right is available where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data** - This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - if you want us to establish the data's accuracy; or
  - where our use of the data is unlawful but you do not want us to erase it; or
  - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party** - We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which



you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent at any time** – This right applies where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our data privacy manager.

### **No fee usually required**

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.

### **What we may need from you**

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. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

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.

March 2023