

ThamesMOG

Data Protection Policy

1 Introduction

This document defines ThamesMOG's (the Centre's) policy concerning the collection, use and security of personal data. The policy is compliant with the legally-binding General Data Protection Regulations (GDPR) now in force. It is mandatory that every organisation that holds personal data has a policy, appoints someone in the organisation to take responsibility for compliance with the Regulations and can provide evidence of compliance.

Although the policy is much the same for all organisations like ours, and may appear overly bureaucratic, for a Centre such as ours the actual operation of the policy is not expected to be onerous. The Regulations are the embodiment of common sense in the context of protecting the privacy of individuals' personal data.

Failure to comply with GDPR can result in fines being imposed by the Information Commissioner's Office (ICO) and compensation claims by people adversely affected.

Everyone in an organisation should understand their responsibilities with regard to people's rights to privacy, i.e. not just those with a defined role in the organisation. You are therefore asked to understand this policy, confirm your acceptance of, and undertaking to comply with, it.

2 Policy

1. **Compliance with GDPR.** The Centre's Data Protection Policy (DPP) will be compliant with GDPR and the Centre will endeavour to operate according to the policy at all times. The Centre's DPP will be consistent with the DPP of the central Morgan Sports Car Centre (MSCC) and comply with data protection obligations placed on Centres by the MSCC. [In the event of any conflict between the requirements of MSCC and the GDPR, the latter shall take precedence].
2. **Communication of DPP.** All Centre members will be advised of the Centre's DPP and of any material changes to it before it is implemented.
3. **Limitation of data.** The Centre will only collect, store and use personal data for the effective operation of the Centre and to maintain a Centre history. These purposes will be embodied in the DPP.
4. **Members' rights.** All Centre members will have the right to know what data is held for them by the Centre, as individuals, and to have it corrected or deleted. Such requests should be directed to the Centre's Data Controller.
5. **Privacy & security.** The Centre will hold personal data in a secure manner, taking reasonable measures to ensure privacy. Any suspicion that there has been a breach of privacy or security should be communicated to the Centre's Data Controller.
6. **Audit.** The Centre will conduct a periodic (at least every two years) audit of its personal data and its compliance with the Centre's policy.
7. **Responsibility for compliance with GDPR.** The Centre will appoint a Data Controller, responsible for maintaining the policy and to handle inputs, requests and enquiries from members concerning the personal data held for them. The Data controller will also be responsible for advising on data protection matters. *It is noted that it is also the responsibility of all Centre members to respect the privacy of other members' data and that this continues even though Centre membership may cease.*
8. **The scope and purposes of personal data for the Centre**
 - a. **Individual's name.** Used as the identity of current, potential and past members.
 - b. **Individual's email address(es).** Used as the default means of communication between the Centre and its members. Email addresses will only be shared between members if a specific need arises (for example in organizing an event) and if the members concerned have given their consent.

- Emails sent through the centres newsletter distribution system are personal emails sent to each recipient individually.
- Where a committee member or event contact needs to send an email to a group of members they will employ the blind copy (Bcc) method so that no email address is inadvertently shared.
- The email addresses of committee members will be public on the website to facilitate communication within the Centre generally, with other parties wishing to contact the centre and between committee members.
- The email addresses of members acting as event contacts will be public in the website to facilitate event coordination and allow for members of other centres to participate.

To comply with 2.5 above where an email address is public in the website the centre will ensure it is appropriately obscured using industry best practice to avoid it being picked up by robots.

- Individual's postal address.** Used when it is necessary to communicate in this way, for example when original hard copy needs to be transferred or when visiting a member's home for the purpose of a meeting or delivery or collection of items.
 - Individual's telephone number(s).** Used for relatively urgent communications when email or postal communication would not be sufficiently effective.
 - Attendance at Centre meetings and events.** A record of attendance at committee meetings is required to be included in meeting minutes. A record of attendance at Centre Noggins is required in order to award the associated trophy. A record of attendance at other events may or may not be required in order to reconcile payment and/or to facilitate the operation of the event. These records may include other information such as car details, but all such information will be provided at the option of the member and only recorded if purposeful.
 - Monetary transactions.** These are records in the treasurer's journal of money paid and received and may of necessity include the identity of individuals. Such records are necessary to properly account for the Centre's money.
 - Individual's names quoted in Centre documents.** Individual's names appear in AGM documents (Minutes, Annual Committee Reports, Election documents), Committee Meeting Minutes and Correspondence generated from time to time as part of the operation of the Centre. Most of these documents form part of a permanent Centre record and are available to be read via the Centre's website, but only by registered centre members who will have signed up to the DPP.
 - Individual's Names quoted in Centre emails.** Individuals' names are only quoted in emails if it is necessary to meet the objectives of the email.
- 9. Retention Period:** Personal Data will be retained only for as long as useful. Individuals' names, email and postal addresses will be removed from membership lists as soon as possible one year after Centre membership ceases unless the member requests to be kept informed of Centre activities pending possible future return to Centre membership. A lapsed member may request that their personal data be removed from membership lists at any time. It is noted that the Centre does not undertake to retrospectively delete personal data from any of the permanent records of the Centre. Permanent records of the Centre are:
- Committee meeting minutes
 - AGM minutes
 - Annual Committee and Financial Reports
 - Accounting records
 - Other Centre documents published to members
 - Reports on, for example, shows and Centre events that are published externally
 - Centre newsletters and similar documents
- 10. Individuals' Acceptance of DPP.** Each current and prospective member will be asked to formally accept the Centre's DPP. This is the means of complying with the requirement of GDPR that the Centre has clear evidence of data protection awareness and undertaking. Each member will also be asked to give their consent to the offered methods of communication from the Centre.

3 Acceptance, Consent and Undertaking

Acceptance of the Centre's Data Protection Policy should be made through the registration form or user profile form on the centre's website. If you cannot do this then complete the form below and return it to the data controller.

If accepting via hard copy:

Please tick all that apply to you:

- ☐ I accept the foregoing policy and agree to ThamesMog holding the data necessary to contact me and to coordinate events I may be involved in. I undertake to respect the privacy of all Members' personal data that may be shared with me by ThamesMog.
- ☐ I agree to the sharing of my data with other centre members who have accepted the Centre's Data Protection Policy in connection with the purposeful operation of the Centre's activities.

Signed

Date

Print name

2nd Joint Member using shared contact details

Signed

Date

Print Name