

Privacy Policy for GDPR for Standard Motor Company Ltd trading as the Standard Motor Club

The Standard Motor Company trading as the Standard Motor Club is a not for profit members' Club.

The new General Data Protection Regulations act comes into force from 25th May 2018. This Privacy Policy is written to explain how the Standard Motor Company Ltd trading as the Standard Motor Club (SMC) uses members' personal data and to record the club's steps taken to ensure compliance with provisions of the General Data Protection Act 2018 and associated Regulations, GDPR.

The Standard Motor Company Ltd trading as the Standard Motor Club is the Data Controller of your Information. The Club's Secretary has been designated as the person responsible for Data Protection Compliance.

1. Data held

a. What personal data do we hold?

Title, name address, phone number, email address of members and associate members. Data from past members is held as an archive with vehicle details. (See below.)

We also hold data (which is not personal data) on vehicles owned by members and the history of such vehicles. Members' data is securely held in electronic format for the duration of their membership and afterwards until the membership is deemed to have lapsed permanently or a request for erasure is made. A record of vehicle details and membership data is kept in an Archive for purposes of vehicle authentication or historical research

b. Where did it come from?

All data is supplied by the member on joining or renewing membership.

c. Who is it shared with?

Names and addresses of current members are supplied to our magazine printers to enable postage. This company has its own security policy for data protection.

Committee members and spares officers and fulfilment officers have access to the full database. This is necessary to enable communication, follow up and to manage Webshop spares sales. Members' names, postal addresses, telephone numbers and email addresses for Webshop orders are kept and shared with spares officers and fulfilment officers.

Members' contact details may be passed on to other Club members for appropriate and reasonable purposes such as technical advice or organisation of club activities.

Consent to hold and communicate an individual's information as described is sought on a positive opt-in basis on joining the Club, and for existing members on the first renewal.

The SMC does not trade, share or sell information to any other organisations who intend to use it to market their products or services to members.

2. Communicating Privacy Information

From 25 May 2018 the membership form, renewal form and all membership forms on the Webshop will contain the following Privacy Statement which members must consent to in order to become a member or retain membership.

Please read the following Privacy Statement when you consent to join or renew membership of the Standard Motor Club.

New General Data Protection Regulations apply from 25/5/2018. The data you provide when you join the Club or if you inform it of changes is necessary for the contract of membership between you and the Club. The legal basis for the Club holding this data is Legitimate Interest.

Club committee members and other officers or members who are responsible for administering club activities (such as magazine mailing, purchases or organising activities) have access to your data. It will not be shared with other commercial organisations outside the club.

The club holds your data securely for the duration of your membership and afterwards until your membership is deemed to have lapsed permanently. A record of vehicle details and your data is kept in an Archive for purposes of vehicle authentication or historical research.

You have the right to request access to your data, to ask for errors to be corrected or for your personal data to be erased. (This would mean loss of membership as without it the contract of membership between you and the club ceases.)

I wish to join/renew membership of the Standard Motor Club and consent for the club to use my data.

Signed..... Date.....

Note: Junior membership is for members under the age of 25. Members under age 16 **must have the consent of a parent or carer for personal data to be given.**

Parent or Carer's signature

3. Individual's Rights

These are:

- The right to be informed about what personal data we hold about you.
- The right of access; any member may request access to their personal data held by the Club, there will be no charge for this and a reply will be sent within one month of the member's request.
- The right to rectification; members can inform the Club of errors or changes to personal data.
- The right to erasure. Members may request that the club deletes their personal data. This would mean that the membership would terminate. Please note that we cannot delete your information if we are required to have it by law or where it is already in printed format, such as past copies of the magazine which may be already in the public domain.

- The right to restrict processing of data. Processing members' data includes supplying lists to the printer and local group members and the committee and spares/fulfilment officers. However if a member does not wish their data to be used in these ways then their membership would cease.
- The right to data portability – this allows individuals to obtain and reuse their personal data for their own purposes across different services. Members may obtain the data held by us in electronic form on request.
- The right to object. The Standard Motor Company Ltd t/s the Standard Motor Club will cease to use a member's personal data if that member objects to its use on the grounds of legitimate interest. However the membership will also cease in this case. We do not use personal data for research or direct marketing purposes.
- The right not to be subject to automated decision-making including profiling. This is not something that the SMC undertakes.

4. Subject Access Requests

We have to supply data we hold to individuals requesting their own data within a month of the application being received

5. Lawful Basis for Processing Personal Data

Standard Motor Company Ltd trading as the Standard Motor Club has reviewed the types of processing activities it carries out and has identified the lawful basis for doing so as Legitimate Interest.

Our lawful basis is that we are a members' Club. The legitimate interest for the data we hold is for communication to the membership as a whole, or groups of members and to allow members to communicate with each other.

We also hold members' data with records of purchases through the Webshop. We do not hold Plastic Card Information.

We do not disclose members' data to outside agencies.

6. Consent to use personal data

Consent must be freely given, specific, informed and unambiguous. When you join you are consenting for your data to be given to the Standard Motor Company t/a the Standard Motor Club.

7. Children

If a person under the age of 16 joins the club then consent must be given for their membership by their parent or carer.

8. Data Breaches

The GDPR introduces a duty on all organisations to report certain types of data breach to the ICO, and in some cases, to individuals. We would notify the ICO of a breach where it is likely to result in a risk to the rights and freedoms of individuals – if, for example, it could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage. Where a breach is likely to result in a high risk to the rights and freedoms of individuals, they would be notified.

In order to minimise the risk of data breaches, the data will be held securely by the club and its officers and password protected or encrypted when processed.

9. Data Protection Design and Data Protection Impact assessments (DPIA)

A DPIA is required in situations where data processing is likely to result in high risk to individuals, for example: where a new technology is being deployed; where a profiling operation is likely to significantly affect individuals; or where there is processing on a large scale of the special categories of data.

The Standard Motor Company Ltd t/a the Standard Motor Club's Legitimate Interest Assessment (LIA) does not indicate that in the context of the data held that a DPIA is required. However we will review our LIA annually.

10. Data Protection Compliance

The Company Secretary takes responsibility for Data Protection Compliance.

11. International

The Lead Data Protection Supervisory Authority is the UK as the majority of members and activities are here. We do have members in EU and other countries. The GDPR applies if you have a single establishment in the EU that carries out processing which substantially affects individuals in other EU states. This is not the case with the Standard Motor Company t/a the Standard Motor Club.

12. Links to other websites

When you use our website you may find and use links to other sites. These will be from organisations or companies offering services for members' convenience or information. These organisations operate independently from the Standard Motor Company Ltd t/a the Standard Motor Club and will have their own privacy notices, statements or policies. We advise that members review these, as we are not responsible for the content of non SMC operated sites or the privacy practices of such sites.

13. Further information

Please write to the Data Protection Compliance Officer at the Company's registered office WOODLANDS GRANGE, WOODLANDS LANE, BRADLEY STOKE, BRISTOL, BS32 4JY if you require further information.

14. Complaints

Please write to the Data Protection Compliance Officer at the Company's registered office WOODLANDS GRANGE, WOODLANDS LANE, BRADLEY STOKE, BRISTOL, BS32 4JY if you have a complaint about how your personal data is used by The Standard Motor Company Ltd t/a the Standard Motor Club.

15. Policy review

This policy will be reviewed regularly to ensure that The Standard Motor Company Ltd t/a the Standard Motor Club continues to protect the privacy of its members.

Appendix 1

Information about cookies

A cookie is a small text file stored alongside your internet browser on your computer or smartphone. It enables us to recognise your computer when you visit the website. The tool is used by many websites to help collect information, such as how many people visit and return to the website, what products or services are being accessed, to make certain parts of the Site function properly and for the purposes of website and system administration. If you have disabled the cookies file in your browser, you may experience technical issues with some parts of the website. See our separate Cookies Policy.

Appendix 2

Social Media

When you participate in various social media forums like Facebook, you should be familiar with and understand the tools provided by those sites that allow you to make choices about how you share the personal data in your social media profile(s). Also, depending on the choices you have made regarding your settings on various social media sites (and/or in combination with your settings on the Standard Motor Club Website Pages), certain personal data may be shared with us about your online activities and social media profiles (e.g. interests, marital status, gender, user name, photo, comments and content you have posted/shared etc.)

Appendix 3

Our Privacy Policy is communicated to any officer or member with access to our database or any members' personal data. We require such officers or members to make the following declaration.

Declaration of compliance with GDPR and SMC Privacy Policy:

I have read and understand the privacy policy of the Standard Motor Company Ltd t/a The Standard Motor Club and I agree to comply with the conditions stated below. I will only use the Personal data supplied by the SMC for the purposes of communicating with members for club matters. I will keep all Personal Data in my possession secure and not allow third party access to it. I will remove from my record any Personal Data no longer required. I will remove all Personal Data from my records upon relinquishing the post I now hold in the club.