



DATA PROTECTION POLICY

GENERAL DATA PROTECTION REGULATION (GDPR) 2018

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1. About the Group and this Policy.

RoSPA Advanced Drivers and Riders Cambridgeshire (RoADARC), is a non-profit making Group affiliated to the Royal Society for the Prevention of Accidents (RoSPA). It is run solely by volunteers who are committed to Road Safety and helping its Members become better and safer drivers and riders.

For the Group to run successfully it has to have certain Personal Information about each Member and this Policy explains why we collect this information about our Members, how we use it, how we keep it secure and your rights in relation to it.

We reserve the right to amend this Data Protection Policy from time to time without prior notice. You are advised to check our website www.roadarc.org.uk regularly for any amendments (but amendments will not be made retrospectively).

We will always comply with the General Data Protection Regulation (GDPR), or any amendments thereto, when dealing with your Personal Data and the “Controller” of that data for the Group is the Membership Secretary.

1.1. Contact Information.

Being a voluntary Group, we do not have an office or clubhouse address, but we can be contacted in the following manner:

The Membership Secretary Email address: memsec@roadarc.org.uk

Secretary Email address: secretary@roadarc.org.uk

1.2. Personal Information.

Members' details are provided by the Members themselves and are stored on computer and paper systems and will only be used for the purposes of administering their Membership of the Group. None of this information will be given to any person or organisation, other than authorised Members of the RoADARC Committee, Helpers and Tutors or to comply with Clause 6.2 of the Group's Constitution (on road incidents). A Helper is a Member who has been recruited by the RoADARC Committee to perform a specific role.

However, if a Member becomes a Member of our Committee, a Helper or a Tutor their details will be shared with RoSPA (our parent organisation). Personal Information is not gathered from any other source. RoSPA have their own Data Protection Policy. See <https://www.rospace.com/Help-Information/Privacy> for details.

Only in exceptional circumstances, might we be required to disclose Members' Information to the Police, regulatory bodies or our legal advisors.

<u>Type of Information</u>	<u>Purposes</u>	<u>Legal Basis for Processing</u>
Member's title, name, address, telephone numbers, email addresses and any advanced driving qualifications obtained including RoSPA membership details where applicable.	Managing the Member's membership of the Group or compliance with Clause 6.2 of the Group's Constitution (on road incidents).	Operating the Group and allowing the Group to have dialogue with the Member.
Tutor's title, name, address, telephone numbers, email addresses and advanced driving qualifications obtained including RoSPA membership number(s) and date(s) of latest test(s).	Managing Driving & Riding Tuition within the Group or compliance with Clause 6.2 of the Group's Constitution (on road incidents).	Operating the Group and allowing the Group to have dialogue with the Member when providing voluntary training including providing a Tutor's contact details.
Subscription payments details (amount, method and date). [Note: Member's bank account details are available to us from cheques and our bank statements, but are not routinely stored by us].	Managing the Member's membership of the Group, primarily the payment of annual membership subscriptions.	Operating the Group and allowing the Group to have dialogue with the Member.

<u>Type of Information</u>	<u>Purposes</u>	<u>Legal Basis for Processing</u>
The validity and expiry of Member's driving documentation, including: vehicle registration number, driving licence, vehicle insurance, payment of vehicle excise duty, MOT (where applicable).	To verify the Member's driving documentation, including: vehicle registration number, driving licence, vehicle insurance, payment of vehicle excise duty, MOT (where applicable) before training commences.	Performing due diligence to ensure the legality of driver/rider, and car/bike before commencing training on the public highway.
Member's password used to access the RoADARC computer-based Membership Database.	To protect an individual's data from un-authorised access.	For additional security, the Group DOES NOT have access to the Member's password.
Sensitive Personal Data. Only in exceptional circumstances will a Member's disability(s) be recorded, and only where this is relevant to their ability to drive/ride or be tutored. e.g. profoundly deaf.	To tailor communication methods and training given to accommodate a Member's specific disability(s).	In order that a Member with a disability(s) is not, as far as is practical, discriminated against.

2. How we will protect your Personal Data.

2.1. Paper-based Records.

Paper based records will be kept securely by the Membership Secretary and Treasurer, for a minimum of two years for back-up and auditing purposes and then securely shredded.

During training a Member's Tutor will temporarily keep paper-based records. These documents may be called upon if a claim is made on the insurance cover provided by RoSPA. Upon completion, or cessation, of training this temporary information will be securely destroyed by your Tutor or returned to you.

2.2. Computer-based Records.

Our computer-based membership records are hosted by **membermojo Ltd.**, a company registered in England & Wales and number: 08956121, who have their own GDPR policy which can be viewed at: <https://membermojo.co.uk/mm/help/gdpr>.

membermojo use cookies to help make their website, and the way you use it, better.

Note: Cookies are small text files that sites transfer to your device (computer, phone or tablet) and make interacting with their website faster and easier.

Our cloud-based back-up and data transfer records are hosted by **Dropbox**, a company based in San Francisco, California USA, who have their own privacy policy which can be viewed at: https://www.dropbox.com/en_GB/privacy

Details of the validity and expiry of Member's driving documentation, including: vehicle registration number, driving licence, vehicle insurance, payment of vehicle excise duty, MOT (where applicable) are held on paper during Member training and shredded on completion of training. They are NOT held on a computer. (See 2.5 below).

2.3. Transfer and Security of Data.

We will not transfer your data outside the European Economic Area (EEA), except as outlined above, or to any other organisation, except RoSPA (our parent organization) as detailed above.

We have implemented generally accepted standards of technology and operational security in order to protect Personal Data from loss, misuse, or unauthorized alteration or destruction.

Please note that where you, or we, are transmitting information to each other over the internet, or by email, this can never be guaranteed to be 100% secure.

To further protect your data and maximise security not all Committee Members, Helpers & Tutors have equal access to all Member's Personal Information. Only the relevant information is made available to them in order to fulfil their duties in relation to the running of the Group and Member training.

All payments made by a Member online to the Group's Bank Account are protected by the Member's Bank's encryption and security software and the Member's own computer firewall and security software and cannot be the responsibility of RoADARC.

Any refunds or payments made directly into a Member's bank account will be made online from the Group's bank account, unless payment is requested by cheque.

2.4. Who else has access to the information you provide us.

We will never sell or share your Personal Data with any third parties except where required to do so by law.

We will only pass your Personal Information on to RoSPA (our parent organisation) **if:**

- You become a Member of the RoADARC Committee, a Tutor or Helper.
- You request us to assist you in applying for a RoSPA test.
- As required to comply with Clause 6.2 of the Group's Constitution (on road incidents)

2.5. Correction, Alteration or Deletion of Personal Information.

The computerised Personal Data that we hold on you is available for you to view at: <https://membermojo.co.uk/roadarc>. Sign in by entering your email address and password and click on View or Edit Details. You then should be able to review all the Personal Information that we hold on you. Should you wish to edit any of this information, click on Edit and change those entries you wish to change and then click on Save, you can then check that the relevant changes have been made correctly. Please note that some items are not editable by members so please contact the Membership Secretary as described below.

Alternatively, you can request the Membership Secretary to let you see what computer-based details we hold on you. For security reasons, this information will only be posted to you at your last known postal address. Once you formally leave, or you simply fail to renew your membership, your details, including payment details, may be held for a further 2 years minimum for auditing and record checking purposes. Paper records of any training you receive will be destroyed by your Tutor when you complete or cease training.

You can also request the Membership Secretary to correct, alter or delete all or any of your Personal Information at any time. However, payment details may need to be retained until the accounts have been audited.

2.6. GDPR Training.

All Committee Members, Helpers & Tutors are required to sign the Doc 022 MOJO RoADARC GDPR Training Confirmation Form indicating that they have understood this RoADARC Data Protection Policy and agree to abide by its Terms and Conditions.

2.7. Data Protection Review.

We will undertake an annual review of who has access to what information RoADARC holds to ensure that your data remains only accessible by authorised Committee Members, Tutors or Helpers.

Committee Members, Helpers and Tutors will be reminded annually that copies of personal information – paper, computer and electronic - must be kept to an absolute minimum (e.g. entered in mobile phone directories or email contact lists) and deleted when no longer required.

2.8. Data Breaches.

We will notify you promptly in the event of any breach of your Personal Data which might expose you to serious risk. We will give you the details of who is dealing with the breach, explain the nature of the breach and the steps we are taking to deal with it.

2.9. Complaints Procedure.

If you feel we have mishandled your data in some way, and are not happy with the way we've handled a request by you in relation to your rights, you have the right to complain to the ICO (Information Commissioners Office) via their website: www.ico.org.uk

3. GDPR Rules as they apply to Committee Members, Helpers & Tutors.

Committee Members, Helpers & Tutors have access to differing amounts of Personal Data according to their role within the Group. However, wherever practical, this data is kept to a minimum for any specific role.

The following roles have full access to Personal Data (except for Members' database passwords):

- Membership Secretary
- Treasurer
- Chairman
- Car Tutor Coordinator
- Bike Tutor Coordinator
- Publicity Officer

All other Committee Members & Helpers only have access to the following information about other Members in the Committee & Helpers Directory:

- Committee post
- Phone numbers
- Email addresses
- Postcode

Car or Bike Tutors only have access to the following information about other Members in the Car or Bike Tutors Directories for their vehicle type (i.e. car /bike):

- Training Status (i.e. Tutor / Advanced Tutor)
- Phone numbers
- Email address
- Postcode

All Committee Members, Helpers & Tutors are instructed that the information is for use only in contacting other Group Members for reasons relating to the Group's activities. This information must not be used or divulged for any other reason. Copies of this information – paper, computer and electronic - must be kept to an absolute minimum (e.g. entered in mobile phone directories or email contact lists) and deleted when no longer required.

If Committee Members, Helpers & Tutors want to communicate Personal Information about Members not available to them in **membermojo**, consider using the telephone or Dropbox.

3.1. Use of Computers

When deleting files containing Members' Personal Data from computers, it is important to remove the file by using 'Shift' and 'Delete', which erases the file completely, rather than just 'Delete', which simply moves the file to the Recycle Bin from where the file could easily be recovered.

3.2. Use of Wi-Fi.

When accessing the RoADARC Membership Database, or Dropbox, authorised Members MUST NOT use PUBLIC Wi-Fi systems unless using a VPN and, if using private Wi-Fi systems, they MUST BE password protected.

3.3. Use of Emails.

Use of email MUST be considered as being insecure and is only to be used if other options are impractical. So, for example when introducing a new Associate to a Tutor; send a series of emails, over a period of time, with a single piece of information in each email. e.g.:

Email 1 – new Associate - John Smith.

Email 2 – JS - 07890 123456

Email 3 – johnsmith@btinternet.com.

For emails to several Members, send the information to your own email address, and blind carbon copy (bcc:) all the other recipients. The carbon copy (cc:) facility in emails MUST NOT be used, as this allows all recipients to see each other's email addresses.

4. Use of Personal Information in Publicity Materials and Social Media.

It MUST be assumed that anything that is contained in RoADARC publicity materials, including the RoADARC Newsletter, or placed on social media, including Facebook, is in the PUBLIC DOMAIN and as such could find its way into the national newspapers, television, radio, etc.

Committee Members, Helpers and Tutors placing any Personal Information in RoADARC publicity materials or other social media, MUST obtain the individual's **written** consent **first** and keep such information (including names, contact details or photographs) to the absolute minimum. One exception to this is that on becoming a Committee Member, Helper or Tutor, a Member agrees, under the standard terms and conditions of membership, to allow their **name** to be published in the RoADARC Newsletter.

Consent can be given on the **Doc 021 MOJO RoADARC Use of Personal Information Consent Form**. This consent will then be recorded and can be viewed on the Member's entry in **membermojo**.

You can also request the Membership Secretary to correct, alter or delete all or any of your consents at any time. However, by its very nature this cannot be retrospectively applied.