



The Triumph Sports Six Club Limited DATA PROTECTION POLICY

1. INTRODUCTION

This document sets out the measures adopted by The Triumph Sports Six Club Limited (“TSSC”) to ensure compliance with the General Data Protection Regulation (“GDPR”). TSSC is subject to the requirements of GDPR and has adopted these measures to be able to demonstrate compliance.

GDPR regulates the “processing” of “personal data”. For this purpose “personal data” means any information relating to an identifiable person which can be used directly or indirectly, to identify that person and “processing “ covers any collection, storage or use of that information. GDPR applies to the processing of personal data by automated means and to the processing by manual means of personal data held in filing systems.

For the purposes of GDPR, TSSC is a “controller” of personal data and persons to whom personal data relates are “data subjects”. As a controller TSSC is required, in processing personal data, to comply with the following six principles:-

1. Personal data must be processed “lawfully, fairly and in a transparent manner”.

2. Personal data must be processed only for “specified explicit and legitimate purposes”.

3. Personal data must be “adequate, relevant and limited to what is necessary”.

4. Personal data must be accurate and kept up to date.

5. Personal data must not be kept for longer than necessary.

6. “Appropriate technical and organisational measures” must be put in place to maintain the security of personal data.

For the purpose of the first of these principles personal data is not to be regarded as being lawfully processed unless one of the following conditions applies:-

(A) the data subject has given consent to the processing.

(B) the processing is necessary for the performance of a contract with the data subject.

(C) the processing is necessary for compliance with a legal obligation.

(D) the processing is necessary to protect the vital interests of the data subject.

(E) the processing is carried out in the exercise of official authority in the public interest.

(F) the processing is for the purpose of the controller's legitimate interests and those interests are not overridden by the interests of the data subject.

GDPR also requires controllers to provide data subjects with certain information, gives various rights to data subjects and imposes additional obligations on controllers.

Section 2 of this document describes the basis of TSSC'S compliance with conditions required for lawful processing in accordance with the first principle above.

Section 3 contains the information which TSSC is required to provide to data subjects.

Section 4 sets out the rights of data subjects in relation to personal data held by TSSC.

Section 5 details the procedures adopted by TSSC to ensure compliance with its additional obligations.

The remaining sections deal with ancillary matters, namely the position of Area Organisers and International Contacts, TSSC's policy on retention of personal data and updates to this document.

2. BASIS OF PROCESSING

TSSC processes personal data of the following types:-

- names, addresses and email addresses of members and others having dealings with TSSC.
- bank and credit/debit card details
- employee records
- records of Area Organisers ,International Contacts, Club Officials and COM members
- details of current and former owners of club vehicles
- information and pictures contained in material submitted for use in The Courier or posted on the TSSC website
- web server log entries which may contain information relating to login ID, IP address and details of usage of the TSSC website.

This data is used for the management and administration of TSSC and the conduct of its affairs, including the collection of subscriptions, the publication of The Courier, the maintenance of membership records, the operation of the TSSC website, the maintenance of records of club vehicles, the organisation of events and activities, the supply of goods and services, the organisation of local areas/International Contacts and communication with and between members.

On the basis of the above TSSC has determined that its processing of personal data is necessary for the purposes of its legitimate interests and that those interests are not overridden by the interests or fundamental rights and freedoms of the data subjects.

For this purpose TSSC's legitimate interests are :-

- the achievement of TSSC's objectives set out in its constitution, as amended from the time to time.
- the promotion of TSSC and of the facilities, goods and services which it offers or arranges.
- the provision of advice, information and assistance to owners of, and persons interested in, Triumph and Triumph based motor vehicles and the provision of goods, services and facilities to such owners and other persons.
- the issue of communications (including The Courier and the TSSC website) to members and the facilitation of communications between members.
- the organisation of events and activities at national and/or local level in the UK and elsewhere.
- the management and administration of TSSC.

TSSC believes that this is the most appropriate basis for processing personal data. Balancing the interests of individuals against those of TSSC, TSSC believes that the interests of data subjects do not override its legitimate interests as described above:-

- personal data is only used by TSSC in ways data subjects would reasonably expect
- personal data is not used in ways which data subjects would reasonably consider intrusive or which would cause them harm
- the personal data held is primarily names and addresses/email addresses
- access is limited and it is not considered that security breaches would result in major detriment

3. INFORMATION FOR DATA SUBJECTS.

3.1 The controller of personal data processed by TSSC is Triumph Sports Six Club Limited, Sunderland Court, Main Street, Lubenham, Market Harborough, Leicestershire, LE16 9TF.

3.2 The purpose and legal basis of processing of personal data by TSSC is as set out in section 2.

3.3 The legitimate interests of TSSC on the basis of which personal data is processed are set out in section 2.

3.4 TSSC needs to disclose personal data to organisations providing services to TSSC and/or its members namely the distribution of The Courier and other publications, the arrangement of insurance requested by members and the fulfilment of certain orders for goods and/or services placed through TSSC.

3.5 personal data held by TSSC may be made available to Area Organisers and International Contacts in accordance with section 6 of this document.

3.6 the periods for which TSSC retains personal data are set out in section 7 of this document.

3.7 the rights of data subjects in relation to personal data held by TSSC are as set out in section 4 of this document.

4. RIGHTS OF DATA SUBJECTS

Under GDPR data subjects have a number of rights. A data subject can request a copy of all personal data relating to him or her held by a controller and can ask to be provided with information about how such personal data is processed.

Where any personal data relating to a data subject is inaccurate that data subject has the right to require the controller to correct the inaccuracy.

A data subject has the right to require the deletion/erasure of personal data if the data concerned is no longer required (for example where a TSSC member has ceased to be a member) or any applicable consent is withdrawn, or the data has been processed unlawfully, or the data subject objects to that data being processed on the basis of the controller's legitimate interests or where there is a legal obligation to delete/erase the data.

Data subjects can also require that the processing of their personal data be restricted (suspended) if they believe that the data concerned is inaccurate, the data is no longer required, the processing is unlawful or the data subject objects to the data being processed on the basis of the controller's legitimate interests.

A data subject can in any event object to the processing of his or her personal data on the basis of the controller's legitimate interests and/or to the use of his or her personal data for direct marketing.

Data subjects wishing to exercise any of the above rights in relation to personal data held by TSSC should contact TSSC at Sunderland Court, Main Street, Lubenham, Market Harborough, Leicestershire, LE16 9TF (email: info@tssc.org.uk) identifying the personal data concerned and specifying the action (provision of a copy, correction of specified errors, erasure, restriction or cessation of use etc) required in relation to such personal data. TSSC may take reasonable steps to verify the identity of anyone seeking to exercise any such right.

In the event that a data subject has any complaint about TSSC's processing of personal data he or she has the right to refer the issue to the Office of the Information Commissioner Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (<https://ico.org.uk/concerns>, telephone 0303 12311113).

5. OBLIGATIONS OF TSSC.

GDPR requires controllers to be able to demonstrate that their processing of personal data is carried out in accordance with GDPR requirements. The objective of GDPR is to ensure that measures are integrated into all systems, processes and procedures involving the processing of personal data which will ensure compliance with the six data protection principles set out in section 1 above.

TSSC aims to achieve GDPR compliance by the adoption and implementation of the policy contained in this document. As part of this policy TSSC is required to observe and apply with certain further specific obligations beyond those necessary to give effect to its obligations referred to in sections 1,2,3, and 4 above.

Where TSSC personal data is processed on behalf of TSSC by third party processors. TSSC will take steps to ensure that the processing of personal data by those processors is undertaken in conformity with GDPR and under written contracts.

TSSC will implement generally accepted technological and operational security measures to protect personal data from loss, misuse or unauthorised alteration or destruction. Such measures will be reviewed from time to time with a view to keeping them up to date. Security breaches will be notified to the Office of the Information Commissioner within 72 hours of TSSC becoming aware of the breach and any affected data subjects will be advised promptly if TSSC consider that an incident poses any risk of loss or damage.

TSSC will maintain records of its processing with a view to being able to demonstrate GDPR compliance.

6. AREA ORGANISERS AND INTERNATIONAL CONTACTS.

Area Organisers in UK and International Contacts in EU countries may access the TSSC membership database in order to obtain contact details of members resident in their area/country. Contact details of members resident in other countries will be made available to the International Contacts for the countries concerned where such members have given consent. Any personal data made available by TSSC to Area Organisers or International Contacts may be used by them solely for the purposes of communicating with members in their area/country on matters of relevance to TSSC and/or its activities and of organising and promoting events and activities of interest to such members.

Area Organisers and International Contacts are not permitted to make any use of TSSC personal data except as set out above. They must implement appropriate security measures (including the use of password protection and up to date anti virus software on any computer system holding TSSC personal data) for the protection of any TSSC personal data they may hold and must destroy, erase or return to TSSC all such TSSC personal data forthwith on any termination of their appointment. Area Organisers and International Contacts should also note that they are solely responsible for any additional personal data they may collect from TSSC members which does not appear in TSSC's own databases.

7. RETENTION OF PERSONAL DATA.

The fifth data protection principle referred to in section 1 above requires that TSSC does not retain personal data for longer than necessary. To give effect to this principle TSSC has adopted the retention periods specified in this section for various types of personal data.

Names and contact details of members will be retained while such members remain members and for six months thereafter to allow for the re-activation of lapsed memberships where requested.

Bank details included in direct debit mandates will be retained until termination of the mandates concerned. Credit and Debit card details will be retained only until completion of the transaction (s) in relation to which such details were provided.

Employee records will be retained until six years after the relevant employee's employment has come to an end.

Records of Area Organisers, International Contacts, Club Officials and COM members will be retained indefinitely. These form part of TSSC's history and will appear in The Courier and as such can be considered to be publicly available, as well as being accessible via the TSSC website.

Details of current and former owners of club vehicles will be retained indefinitely. TSSC considers that building up the history of club vehicles is an important part of preserving the motoring heritage which these vehicles represent. The ownership record of such vehicles forms part of their history and former owners may be willing to provide details of the history of the vehicles concerned.

Information and pictures contained in material submitted for use in The Courier will be retained indefinitely. Again this forms part of TSSC's history. Historic issues of The Courier and of other TSSC publications are available via the TSSC website and it would not be practicable for personal data to be redacted from those issues.

Web postings and content and web server log files are deleted in accordance with the retention and deletion policies of TSSC's hosting supplier.

8. UPDATES.

The policy contained in the document is applicable from 25th May 2018. It will be reviewed from time to time by the Council of Management of TSSC with a view to ensuring that TSSC's policy on data protection is at all times compliant with applicable legislation, TSSC reserves the right to amend its data protection policy at any time without prior notice but will give details of any changes on the TSSC website.