



# PRIVACY POLICY

## for The Imp Club Limited



The Imp Club Limited (hereinafter referred to as "the Club") treats the privacy of its members and website users very seriously and we take appropriate security measures to safeguard your privacy. This Policy explains how we protect and manage any personal data\* you share with us and that we hold about you, including how we collect, process, protect and share that data.

\*Personal data means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home or other physical address, an email address or other contact information (whether at work or at home). Once you have joined the Club you will be allocated a membership number, this will be linked to other personal data as indicated above. We will also record any owned vehicle information which includes its registration number (as appropriate) and the Vehicle Identification Number (VIN).

### How we obtain your personal data

#### Information provided by you

You provide us with personal data either on your application form, renewal form, via an online application or renewal form, by email communication or over the telephone (we do not record telephone conversations). We may also keep information contained in any correspondence you may have with us by post.

This includes:

- Name,
- Address,
- Email address,
- Mobile and/or landline telephone number,
- Forum username (if a registered user)
- Vehicle details including registration number and VIN

We record this information in a computer database (locally/off-line) and use this information in order to manage and administer your membership whilst you remain a member of the Club. Please also see the 'How long do we keep this information about you?' section below.

### How we use your personal data

We use your personal data to manage and administer your membership. This includes the collection of payments and verifying your identity when you contact us to discuss your membership. We undertake at all times to protect your personal data, including any financial interactions, in a manner which is consistent with the requirements of Data Protection and all associated legislation. We will also take all reasonable security measures to protect your personal data in storage.

The key component of your membership and the services we offer is the delivery, by post, of your club magazine. Holding your name and address is therefore essential. Your personal details will be used to communicate with you for the purposes of managing your membership (eg renewal notification).

All members of the Club, whether FULL, ASSOCIATE, COMPLIMENTARY or HONORARY and whether resident in the United Kingdom, European Economic Area or the Rest of the World will have their personal data managed and administered in the same way in accordance with this policy and in line with UK data protection legislation.

### Do we use your personal data for marketing purposes?

Any information that you choose to give us will NOT be used for marketing purposes by us. We will hold your personal data only for the purposes of administering and managing your membership.

## **Information about cookies**

A cookie is a small text file stored alongside your internet browser on your computer or smartphone. Details about Forum cookies and the Forum's Privacy Policy can be found via a link on the Forum login page. More details about Cookies can be found here: [www.aboutcookies.org](http://www.aboutcookies.org).

## **About the Club Forum**

Forum.theimpclub.co.uk is a Club service, but is an open forum that can be used by members and non-members. The information you enter and share here is covered by the phpBB (our forum provider) general forum rules, terms and conditions. The only mandatory elements include a uniquely identifiable name (forum user name), a valid email address (not necessarily the same one on your membership record) and a real name. At the time of registering you will be asked to mandatorily tick a box to confirm you are a Club member and voluntarily enter a membership number. The Club forum administrators will use your forum entered details to confirm you are a Club member to enable you to gain access to the 'member only' pages and to administer your forum membership. Your forum user name will be shared with the Club Membership Secretary as a means to confirm you as a member.

## **Sharing information**

We will keep information about you confidential and sharing of your personal information will only be those detailed below.

### **Sharing of personal data internally:**

From time to time share your personal information within the Club, but will only with those detailed below:

- Treasurer - for the purposes of accounting and financial regulation.
- Regalia Officer - for the purposes of verifying membership and delivery of ordered regalia items.
- Spares Officer - for the purposes of verifying membership and delivery of ordered spares items.
- Area Centre Co-ordinator - for the purposes of managing and delivering services to the Area Centre network.
- Area Centre Organisers (UK) for the purposes of arranging and co-ordinating local meetings, events and activities together with related necessary communications.
- Overseas Contacts (Outside the UK) for the purposes of arranging and co-ordinating local activities together with related necessary communications. (Upon request and only overseas members relevant to their area of interest).
- Forum Manager for the purposes of administering the forum and verify membership for member specific access and ensuring accuracy of records.
- Model Registrars – to maintain and collate records of vehicles and their production history.
- In relation to our National Club Event with event organisers only – for the purposes of verifying your membership and ensuring accurate recording of information.

### **Sharing of personal data externally:**

We will only share your personal details outside the Club in order for you to be able to receive the benefits of Club membership. These are detailed below:

- Mailing and printing agents that provide a service to us in order to deliver Club benefits (eg Impressions) making use of their secure data portal and on the understanding that they keep the information in line with their own Privacy Policy.
- sharing of limited personal details (eg membership number and name) with Committee approved organisations in relation to spares and services directly related to the Hillman Imp and its related models and variants in order for them to verify your identity when you wish to make use of member exclusive offers.

## **Transfer of your personal data outside of the European Economic Area (EEA)**

Upon request, we currently share limited elements (name, address, and car details) of your personal data with Club recognised Overseas Contacts as relevant to their own Country (area of interest). UK members will not have their details shared with Overseas Contacts. This is on the understanding that the receiver complies with the terms of this policy and agrees to provide the same or similar protection and they only use your personal data in accordance with Club rules and instructions.

## **How long do we keep this information about you?**

We keep your information for a maximum of 2 years from the time of your membership expires. This is retained to enable verification of yourself as a previous member should you wish to re-join the Club after a period of your membership being lapsed. Some of the information you have provided will need to be retained for longer to meet legal, statutory and regulatory obligations. A continuous review of the personal information held will be undertaken and information which is no longer required for the above reasons will be disposed of securely.

## **Data subject rights**

### **Subject access requests**

You have the right to ask for all the information we have about you and the services you receive from us. When we receive a request from you we must give you access to everything we've recorded about you. Our formal response shall include the following:

- details of the personal data we hold about you;
- sources from which we acquired the information;
- the purposes for processing the information; and
- persons or entities with whom we are sharing the information.

### **Ask for inaccurate information to be corrected**

You have the right to obtain from us, without undue delay, the rectification of inaccurate personal data we hold about you.

### **You can ask us to delete information**

In some circumstances you can ask for your personal information to be deleted, for example:

- Where your personal information is no longer needed for the reason why it was collected in the first place.
- Where you have removed your consent for us to use your information.
- Where there is no legal reason for the use of your information.
- Where deleting the information is a legal requirement.

Please note that we can't delete your information where:

- We're required to have it by law.
- It is for, scientific or historical research, or statistical purposes where it would make information unusable.
- It is necessary for legal claims.

### **Where data has been shared**

We shall communicate any rectification or erasure of personal data or restriction of processing as described above to each recipient to whom the personal data has been disclosed.

### **Right to data portability**

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller, without hindrance from us.

## **Right to object**

You shall have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you, including any personal profiling; unless this relates to processing that is necessary for the performance of a task carried out in the public interest or an exercise of official authority vested in us. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of you, the data subject, or for the establishment, exercise or defence of legal claims.

## **Right to not be subject to decisions based solely on automated processing**

We do not carry out any automated processing, which may lead to an automated decision based on your personal data.

## **Who to contact**

If you would like to contact the club about any of the above please write to the Membership Secretary, Stonecroft, Glebe Close, Barton, Richmond, North Yorkshire. DL10 6JZ or email to [DataProtection@theimpclub.co.uk](mailto:DataProtection@theimpclub.co.uk)

## **Accuracy of information**

In order to provide the highest level of membership support, we need to keep accurate personal data about you. please help us with this by keeping us informed of any changes when they occur.

## **Important information**

### **Questions and queries**

If you have any questions or queries which are not answered by this Privacy Policy, or have any potential concerns about how we may use the personal data we hold, please write to: Membership Secretary, Stonecroft, Glebe Close, Barton, Richmond, North Yorkshire. DL10 6JZ or email: [DataProtection@theimpclub.co.uk](mailto:DataProtection@theimpclub.co.uk)

### **Policy changes**

This Privacy Policy is regularly reviewed. This is to make sure that we continue to meet the highest standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend this Policy. We suggest that you review this Privacy Policy from time to time to ensure you are aware of any changes we may have made, however, we will not significantly change how we use information you have already given to us without your prior agreement. The latest version of this policy can be found at [www.theimpclub.co.uk/dataprotection](http://www.theimpclub.co.uk/dataprotection)

### **If you have a complaint**

If you have a complaint regarding the use of your personal data then please contact us by:

Writing to: Membership Secretary, Stonecroft, Glebe Close, Barton, Richmond, North Yorkshire. DL10 6JZ  
or email to: [DataProtection@theimpclub.co.uk](mailto:DataProtection@theimpclub.co.uk)

And we will do our best to help you.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioners Office (ICO), you can contact them on 01625 545745 or 0303 123 1113. You also have the right to judicial remedy against a legally binding decision of the ICO where you consider that your rights under this regulation have been infringed as a result of the processing of your personal data. You have the right to appoint a third party to lodge the complaint on your behalf and exercise your right to seek compensation.

**(Version date: April 2018)**