



## Northern Ireland Rat Motorcycle Club

### Data Protection Policy

#### Introduction

1. The Northern Ireland RaT Motorcycle Club [the RaT Club] provides a programme of ride outs and events for its members. It is affiliated to the British Motorcyclists Federation (BMF).
2. In order to deliver these services, the RaT Club processes personal information on behalf of its members. This Policy sets out the RaT Club's approach to the protection of personal data.
3. RaT Club members provide certain personal data, and where appropriate, sensitive personal data when applying for membership and/or attendance at RaT Club events. The information provided is used in the administration and governance of the RaT Club, including the creation of a membership contacts list. This data is used for:
  - processing applications for membership
  - maintaining a current membership list
  - processing applications for events
  - organising events and travel\*
  - maintaining necessary historical records
  - the health and safety of members\*\*

\*The data may be shared with a third party providing a service in connection with RaT Club events, for example hotels, transport operators or clothing providers. Ordinarily, it will **not** be disclosed to any other third party without firstly obtaining your explicit consent. Personal data is not shared for marketing or commercial purposes.

\*\*Emergency Contact information –Individual members **must** ensure that they have the permission of the emergency contact to share this data with the RaT Club and that they have informed the Contact of its purpose.

#### Scope

4. This policy sets out the RaT Club's commitment to ensuring that any personal data, which it processes, is carried out in compliance with data protection law.
5. 'Data Protection Law' includes the General Data Protection Regulation 2016/679; the UK Data Protection Act 2018 and all relevant EU and UK data protection legislation.
6. Under the GDPR *processing* refers to any type of handling of personal data, including:



## Northern Ireland Rat Motorcycle Club

### Data Protection Policy

- obtaining, recording or keeping data
  - organising or altering the data
  - retrieving, consulting or using the data
  - disclosing the data to a third party (including publication)
  - erasing or destroying the data
7. **The RaT Club** will ensure that all personal data is:
- processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency')
  - collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation')
  - adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')
  - accurate and, where necessary, kept up to date and that reasonable steps will be taken to ensure that personal data that are inaccurate, are erased or rectified without delay ('accuracy')
  - kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation')
  - processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').
8. The RaT Club will facilitate any request from a data subject who wishes to exercise their rights under data protection law as appropriate.

### Procedures

9. The RaT Club will:
- not do anything with your data that you would not expect given the content of this policy and the privacy notice
  - ensure that RaT members receive the appropriate privacy notice advising members how and why their data is being processed, and advising data subjects of their rights
  - only collect and process the personal data that it needs for purposes it has identified
  - ensure that, as far as possible, the personal data it holds is accurate,



## Northern Ireland Rat Motorcycle Club

### Data Protection Policy

- only hold onto your personal data for as long as it is needed, after which time the RaT Club will securely erase or delete the personal data. This Policy sets out the appropriate period of time.
  - ensure that personal data can only be accessed by those who need to access it and that it is held and transferred securely.
10. The RaT Club will ensure that Committee Members who handle personal data on its behalf are aware of their responsibilities under this policy.

### Data Subject Rights

11. The RaT Club will facilitate any request made by an individual to exercise their rights under data protection law. The Club Secretary will deal with such requests in the first instance, but will require appropriate Committee members to consider requests without undue delay and within one month of receipt as far as possible.
12. **Subject access:** the right to request information about how personal data is being processed, including whether personal data is being processed and the right to be allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:
- the purpose of the processing
  - the categories of personal data
  - the recipients to whom data has been disclosed or which will be disclosed
  - the retention period
  - the right to lodge a complaint with the Information Commissioner's Office
  - the source of the information if not collected direct from the subject.
13. **Rectification:** the right to allow a data subject to rectify inaccurate personal data concerning them.
14. **Erasure:** the right to have data erased and to have confirmation of erasure, **but** only where:
- the data is no longer necessary in relation to the purpose for which it was collected, or
  - where consent is withdrawn, or
  - where there is no legal basis for the processing, or
  - there is a legal obligation to delete data



## Northern Ireland Rat Motorcycle Club

### Data Protection Policy

15. **Restriction of processing:** the right to ask for certain processing to be restricted in the following circumstances:
  - if the accuracy of the personal data is being contested, or
  - if our processing is unlawful but the data subject does not want it erased, or
  - if the data is no longer needed for the purpose of the processing but it is required by the data subject for the establishment, exercise or defence of legal claims, or
  - if the data subject has objected to the processing, pending verification of that objection
  
16. **Data portability:** the right to receive a copy of personal data which has been provided by the data subject and which is processed by automated means in a format which will allow the individual to transfer the data to another data controller.
  
17. **Object to processing:** the right to object to the processing of personal data relying on the legitimate interests processing condition unless the RaT Club can demonstrate compelling legitimate grounds for the processing which override the interests of the data subject or for the establishment, exercise or defence of legal claims.

### Monitoring and review

18. This policy will be monitored and reviewed, as and when required.

Agreed October 2018

Reviewed January 2023



## Northern Ireland Rat Motorcycle Club

### Data Protection Policy

| <b>Retention of information</b>   |   |   |
|---|---|---|
| <b>Ordinary personal data held in electronic format</b>   | <b>Administration Purpose/Legal Ground</b>  | <b>Guideline Retention Period</b>   |
| Agreement RaT Club<br>Constitution  | Administration of membership contract<br><br>Record of agreement to abide by RaT Club Constitution  | During membership and held for 6 years after membership ends.<br><br>Membership is updated annually.  |
| Contact details*<br>ICE contact details<br>Motorbike details<br>Passport number<br>Clothing sizes | Administration of membership contract<br><br>For membership and events purposes<br><br>Notification of RaT Club events<br><br>Emergency contact for welfare purposes<br><br>Organisation of RaT Club events<br><br>Provision of RaT Club clothing | During membership and held for 1 year from year end as per Constitution<br><br>*Contact details may be retained for longer if requested by an individual [it is the individual's responsibility to ensure contact details are up to date] |
| Financial information<br>e.g bank transaction details   | Administration of RaT Club finances and audit<br>Keeping appropriate records for<br>Inland Revenue purposes   | During membership and held 7 years from year end as per Constitution  |



## Northern Ireland Rat Motorcycle Club

### Data Protection Policy

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|---|--|---|
| <p>RaT Club Records:</p> <p>Names of RaT Club members, Committee members and Honorary members</p> <p>AGM minutes including names of attendees/ proposers</p> <p>Ride out attendance lists</p> <p>Image [where consent is given]</p> | <p>RaT Club governance and administration</p> <p>RaT Club archive purposes</p> <p>Legal purposes</p> <p>Maintenance of RaT Club website and social media</p> | <p>Retained indefinitely as a matter of RaT Club record</p>     |
| <p>Conduct /disciplinary matter involving members e.g. correspondence received/issued in accordance with the Constitution</p>   | <p>Administration of Club and welfare of members and others</p> <p>Performance of contract</p>   | <p>Indefinitely</p>   |
|   |  |   |
| <p><b>Data held in hard copy format</b></p>   | <p><b>Administration Purpose/Legal Ground</b></p>  | <p><b>Guideline Retention Period</b></p>                        |
| <p>As above</p>   | <p>As above</p>  | <p>Held during relevant membership year as per Constitution</p> |