

# Privacy Policy

This privacy policy sets out how R.R.E.C. Limited ("we" or "us" or the "Club") collects, uses and protects any personal data that you give us. In accordance with the General Data Protection Regulation (GDPR) it also sets out the legal basis on which such personal data is processed.

We are committed to ensuring that your personal data is protected. Should we ask you to provide certain data by which you can be identified such data will only be used in accordance with this privacy policy.

We may change this policy from time to time by updating this page. This policy is effective from **31<sup>st</sup> March 2018**.

## Content

[Processing on the legal basis of 'legitimate interests'](#)

[Processing on the legal basis of 'consent'](#)

[Retention of personal data](#)

[Keeping your personal data secure](#)

[Cookies](#)

[Personal data transfers](#)

[Your data protection rights](#)

[Right to lodge a complaint with a Supervisory Authority](#)

## Processing on the legal basis of 'legitimate interests' (Article 6.1(f) of the GDPR)

In simple terms the legal basis of 'legitimate interests' means that the processing is necessary to provide the benefits and services the Rolls-Royce Enthusiasts Club (the "Club") provides, be it application to become a member of the Club, administration of your ongoing membership or a general enquiry.

In order to do this we may collect and keep a record of personal data about you from our website, membership form, telephone conversations, emails and written communications. When you contact us via our website, you may be required to provide certain information such as your name, address, email address and telephone number. We may also ask you for additional information such as mobile phone number, fax, credit card details, as required under the circumstances. Please let us know if any of your personal data changes or is inaccurate so that we may keep our records up-to-date.

We may use the personal data we collect from you in various ways, including:

- to process any orders placed by you;
- to process and administer your membership
- to communicate with you;
- for maintaining our internal records;
- to improve the quality of our service; and
- to protect our website and systems against unauthorized access.

Should you choose to become a member only your surname and initial, membership number and car details will be available for display in the password-protected 'members area' of our website.

Your personal data may be circulated to officers of the Club for purposes such as informing the Club's section secretaries of new members in their areas, introducing you to your local sections of the Club, or introducing you to registers within the Club specific to your model of motor car. However, we do not share your personal data with any third parties for marketing purposes.

## Processing on the legal basis of 'consent' (Article 6.1(a) of the GDPR)

In certain circumstances we may ask for your specific permission ('consent') before processing your personal data. In these circumstances we will provide notice of the exact nature of the processing and give you a genuine choice to accept or refuse.

Should you choose to accept ('consent') to such processing you then have the right to withdraw your 'consent' by informing us that you no longer give permission for your personal data to be used in this way.

### **Retention of personal data**

Unless there are overriding legal requirements, we retain your personal data only for as long as necessary to:

- Complete the service requested.
- If you are a member for no more than 12 months after you terminate your membership of the Club.

### **Keeping your personal data secure**

All information we collect about you will be used and protected by us in accordance with current data protection law and this Privacy Policy.

We are committed to ensuring that your information is kept secure. In order to prevent unauthorised access or disclosure we have put in place appropriate technical and organisational measures to safeguard personal data from loss, misuse, unauthorised access, disclosure, alteration, damage or destruction.

### **Cookies**

In respect of data collected from our website, we use standard technology called 'cookies'. Cookies are small pieces of information that are stored by your browser on your computer's hard drive. We need this information to identify you and to store information about the products you select between visits. This helps us to improve our service to you. Although most browsers automatically accept cookies you can usually change your browser to prevent cookies being stored. If you do turn cookies off, however, this will limit the service that we are able to provide to you.

### **Personal data transfers**

The Club does not transfer the personal data it collects to any other entity outside of the EEA.

### **Your data protection rights**

Under GDPR you have certain rights with regards to the processing of your personal data. If you would like to exercise any of these rights or need further information please contact the Club at The Hunt House, Paulerspury, Towcester, Northants, NN12 7NA, telephone +44 (0) 1327 811788, E-mail: [reception@rrec.org.uk](mailto:reception@rrec.org.uk)

These rights are summarised below.

#### **Right of access**

You may request details of personal data that we hold about you including:

- a description of the personal data, the purposes for which it is being processed, whom it may be shared with and how long it is kept for
- information on your rights of rectification, erasure, restriction and objection as described below
- existence of automated decision making where relevant
  - Please note that the Club does not use automated decision making
- transfer safeguards where relevant
  - Please note that the Club does not transfer the personal data it collects to any other entity outside of the EEA

#### **Right of rectification**

You have the right to have inaccurate personal data rectified without delay.

### **Right to erasure**

Under some circumstances you have the right to request the erasure of your personal data without undue delay.

Examples

- Withdrawal of consent where consent was basis of collection
- No longer necessary for purposes collected
- No overriding 'legitimate interest' grounds

### **Right of restriction**

You have the right to ask us to restrict the processing of your personal information under the following circumstances

- Accuracy is contested
- Processing is unlawful but you oppose deletion and request restriction instead
- Your personal information is no longer needed by the Club but you require it to be kept for establishment, exercise or defence of legal claims
- Pending a right to object action (see below)

### **Right to object**

You have the right to object to processing of your personal information on grounds relating to your particular situation or circumstances.

You have the right to object to direct marketing.

### **Right to portability**

You have the right to have your personal data that we have collected on the legal basis of 'consent' transferred to another entity in a machine-readable format.

### **Right to lodge a complaint with a Supervisory Authority**

You have a right to lodge a complaint with the Supervisory Authority in the country of your place of residence or work. The Supervisory Authority in the UK is the Information Commissioner's Office (ICO).