

**Moray Advanced Motorists and Motorcyclists (MAMM)
(Group Number 6039)**

Registered Charity Number 035561

Data Retention and Use Policy (General Data Protection Regulations – 2018)

Purpose – the purpose of this document is to provide an overview of how the MAMM Group will protect and use your personal data, as described and required by the GDPR(2018) and IAM RoadSmart.

Applicability – the policy (including the Rules and the actions identified in it) apply to:

- All MAMM Group Committee members
- All MAMM Group Observers

Additional information – additional information regarding the Group's Rules in relation to data protection is available at Appendix 1 to this Policy.

Data Source(s) – all the data held by the Group is provided by IAM RoadSmart from:

- Notification of Group allocations (a new member has been assigned to the MAMM)
- The IAM RoadSmart DTE Website, used to manage members' progression through the training process and membership details

Any additional data provided by an Associate to an Observer or other Group Member, in relation to the Group's business, will be treated in accordance with this policy.

Opting out – all Group members (Associate and Full) have the right to opt out of the Group's Policy on Data Retention and Use by:

- Indicating your choice on the Group's Contract Statement
- Informing the Group Treasurer (Membership Secretary)

Review – the Policy and Rules will be kept under review to ensure your data remains safe so far as reasonably practicable and compliant with any changes to the Regulations, made known to the Group by IAM RoadSmart. They will also be reviewed when the role of Chair is passed to a new, elected person.

Contact – in the event of needing any further information contact the Group Chairman using the address that can be found on the Contact page of this website.

Sign:

A handwritten signature in black ink, appearing to read 'Ian Jones', written over a light blue horizontal line.

Date: 30 September 2018

Ian Jones - MAMM Group Chair

1. **Retention and Use Policy Group - Associate Members Information**

RECORDS HELD (Type of Data)	REASON FOR RECORD (The purpose or use of the data)	RETENTION PERIOD (Timescale in years)	ACTION FOLLOWING RETENTION	ACTION COMPLIES WITH
<p>Data will be held electronically and will include some or all of the types identified below:</p> <ul style="list-style-type: none"> • Name • Address • Year of birth • Email address • Emails • Telephone • Photographs • Testimonials • Video¹ <p>The hard copy portfolio of evidence regarding course progression will be held by the Associate</p>	<p>Your data will be used to contact you to:</p> <ul style="list-style-type: none"> • Make or update training session arrangements • Inform you of Group information • Notify you of relevant official Group business (AGM, for example) <p>The Group will NOT use your data for marketing purposes or pass it to 3rd parties for any purpose.</p>	<p>Once converted to Full member status, data is held as below.</p>	<p>If the Associate does not continue to full membership, all data will be cleansed</p> <p>See 'Retention and Use Policy Group - Full Members'</p>	<p>GDPR Guidelines IAM RoadSmart Policy</p>

¹ If used for Observed rides or recorded Testimonials

2. Retention and Use Policy Group - Full Members Information

RECORDS HELD (Type of Data)	REASON FOR RECORD (The purpose or use of the data)	RETENTION PERIOD (Timescale in years)	ACTION FOLLOWING RETENTION	ACTION COMPLIES WITH
<p>Data will be held electronically and will include some or all of the types identified below:</p> <ul style="list-style-type: none"> • Name • Address • Year of birth • Email address • Emails • Telephone • Photographs • Testimonials 	<p>Your data will be used to contact you for:</p> <ul style="list-style-type: none"> • Official Group business • Renewal of Group membership subscriptions <p>The Group will NOT use your data for marketing purposes or pass it to 3rd parties for any purpose.</p>	<p>Permanent while the person remains a Group member</p> <p>Computers, tablets and smart phones used to keep data on will be password protected, use up-to-date software and have an appropriate level of security software measures</p>	<p>If a member leaves the Group data will be retained for a period not exceeding 2 years</p>	<p>GDPR Guidelines IAM RoadSmart Policy</p>

3. Retention and Use Policy Group Observers (Local and National) Information

RECORDS HELD (Type of Data)	REASON FOR RECORD (The purpose or use of the data)	RETENTION PERIOD (Timescale in years)	ACTION FOLLOWING RETENTION	ACTION COMPLIES WITH
Data will be held electronically and will include some or all of the types identified below: <ul style="list-style-type: none"> • Training records and portfolio of evidence • CPD attendance • Associate details 	The data held will be used to: <ul style="list-style-type: none"> • Contact Observers to make or update training session arrangements • Proof of progression of learning as an Observer <p>The Group will NOT use your data for marketing purposes or pass it to 3rd parties for any purpose.</p>	While active in the role	Destroyed	GDPR Guidelines IAM RoadSmart Policy

Appendix 1: Data Retention and Use Policy (GDPR – 2018) – Group Rules for Data Retention and Use

Appendix 1

Data Retention and Use Policy (GDPR – 2018) – Group Rules for Data Retention and Use

1. Applicability:

1.1 These Rules apply to:

1.1.1 All MAMM Group Committee members (elected Officers of the Group).

1.1.2 All MAMM Group Observers (Local and National).

2. Data Retention and Security:

2.1 Members' and Associates' data (as defined in the Policy) *shall* be held:

2.1.1 Only by elected Officers of the Group or Group Observers² for the purpose(s) relevant to the role of the elected Officer or Observer.

2.1.2 In electronic format only.

2.1.3 For the duration specified in the Policy.

2.1.4 On an electronic device that is password protected (the password *shall* be **known only** by User of the data) and has up-to-date security software.

2.2 Any paper documents created *shall* be given to the Member/Associate, at the time of creation, for their retention – no copies *shall* be made of the paper document by an elected Officer or Observer.

2.3 Elected Officers of the Group and Group Observers are **personally** responsible for the security of the data they hold.

2.4 Any loss of data, potential or actual breach of data security *shall* be reported **immediately** to the Group Chairman

3. Data Use:

3.1 Members' and Associates' data (as defined in the Policy) *shall* be used **solely** for the following purposes:

3.1.1 Effective management of the Group, including (but not limited to) contacting Members and Associates to inform them of IAM RoadSmart or Group matters, provide them with information relating to the Group, requesting membership renewal subscriptions, promoting the Group (with the Associate's or Member's permission – see 3.2.4 below).

3.1.2 Allocation of Observers to Associates for the purposes of IAM RoadSmart course progression.

3.1.3 Arranging observed drives/rides appropriate to their IAM RoadSmart course package.

² In respect of the Associates they are assigned to for the purposes of IAM RoadSmart course progression

- 3.2 Members' and Associates' data (as defined in the Policy) *shall not* be:
 - 3.2.1 Retained in paper format.
 - 3.2.2 Retained beyond the retention period stated in the Policy.
 - 3.2.3 Used for Group marketing or advertising purposes without the Member's or Associate's explicit permission.
 - 3.2.4 Shared with anyone who is not an elected Officer of the Group or outwith the Group, without the Member's or Associate's explicit permission. The permitted exchange of that data *shall* be specifically and *solely*, for Group or IAM RoadSmart purposes.
 - 3.2.5 Held on a device that is not password and security protected (as described in Section 2.1.4) of this Appendix.
 - 3.2.6 Held on a USB memory stick, flash-drive, SD card or other such storage device.

4. Data Destruction:
 - 4.1 Members' and Associates' electronic data *shall* be **permanently** deleted from all storage devices on which data is held when:
 - 4.1.1 A Member leaves the Group, after a period not exceeding 2 years.
 - 4.1.2 An Associate does not continue to full membership.
 - 4.1.3 An elected Officer resigns or is voted out of the position held, in accordance with the Group Rules.
 - 4.1.4 An Observer ceases to hold that role within the Group.

5. Exceptions:
 - 5.1 If an Associate or Member chooses to provide any data (as defined in the Policy) to any Member of the Group (whether an elected Officer or Observer or not) for purposes other than official Group business, the retention, use and destruction of that information does not fall within the scope of this Policy or Rules.