



## MEMBER PRIVACY POLICY

The Royal Automobile Club is committed to protecting your privacy and meeting the requirements of data protection legislation. This privacy policy explains:

- what personal data we collect about you
- why we collect that personal data
- who we share your personal data with
- why we might contact you and how you can change that
- how long we retain your personal data for
- how we keep your personal data secure
- what rights you have in relation to your personal data.

When the Club talks about 'personal data' in this policy, the Club means any information which could be used to identify you, either directly or indirectly when combined with any other information the Club may hold about you.

This privacy policy covers our use of your personal data which the Club collects about you through the membership and renewals process, reservations and bookings at our facilities, attendance at our events, and your other interactions with the Club.

In this privacy policy, when we refer to 'we', 'us', 'our' or 'Club' we mean Pall Mall and Woodcote Park Clubhouses Limited which is often referred to as The Royal Automobile Club of 89/91 Pall Mall, London SW1Y 5HS. The Club is the data controller for the purposes of the Data Protection Act 1998 under the Information Commissioner's Office registration number ZA317056.

If you would like to contact the Club about this privacy policy or for further details about how the Club use your personal information please contact [members@royalautomobileclub.co.uk](mailto:members@royalautomobileclub.co.uk).

### Personal data collected by the Club

The Club holds the following personal information:

- Personal data that you provide to us

We store personal data you provide directly to us through your membership application and throughout the length of your membership, which includes your annual renewal, bookings, enquiries, preferences provided and attendance at events.

- Personal data we collect about you

The Club stores personal data that the Club collects about you when you use our services and physical and online facilities. These include things such as bookings history, financial transaction information and CCTV images.

- Personal data from other members

As part of the membership application process the Club will collect information about you from other members who are supporting your application. The Club may also hold on file information from other members of the Club and or which is in the public domain, where appropriate.

- Personal data relating to children

The Club holds data relating to members aged under 16 years old in order to provide Junior memberships. The Club collects and processes this data with the consent of a parent or holder of parental responsibility.

### **Reasons for collecting that personal data**

The Club collects and stores personal data in order to provide you with membership-related services, such as access to our facilities and attendance at our events, on the basis of performance of a contract or to take steps to enter into a contract such in the application for or renewal of membership.

The Club has a legal obligation to collect and store some information, such as information to safeguard the health and safety of our members and employees.

The Club also has legitimate interests for processing your data which include:

- collecting and storing information for demographic and research purposes in line with the Club's heritage values and to assist the Club's business planning for members
- collecting and storing information about your preferences, likes and dislikes in order to provide a high level of customer service
- processing information in order to provide members with information about Club news and events and offers available as part of their membership
- processing information relating to usage of Club facilities for consideration for committee membership
- processing information such as your preferences and purchase history in order to send you tailored offers and events
- organising activities and matches through the Club's Activity Groups
- information required to investigate a breach or suspected breach of the Club's rules.

Where the Club is relying on its legitimate interests for using your data, it will conduct an assessment to ensure that this is proportionate and fair.

The Club will process special categories of personal data as required, such as medical (including allergy) information in order to make special adjustments for the use of premises and facilities, where you have chosen to make this information known to us. The Club will store this information for the duration of your membership.

### **Who the Club shares your personal data with**

The Club may share your personal data with the following types of organisations when required:

- printing firms within the UK, in order to provide printed documents necessary for our services such as membership cards, seating plans for events and similar
- mailing houses within the UK, in order to post out information to you, such as our Annual General Meeting (AGM) information and *Pell-Mell & Woodcote*
- the providers of the IT systems used by the Club (including by Activity Groups)
- partner companies within the UK with which the Club is running events, in order to compile guest lists
- from time to time the Club may use an accredited third party confidential waste provider to securely dispose of personal information.

The Club will only provide your personal information (such as name, membership number and contact information) to Reciprocal Clubs (whether within or outside of the EEA) at your explicit request in order for you to use their facilities within the UK or overseas.

### **Receiving communications from the Club and updating your preferences**

Members receive emails from the Club about events, activities and offers that the Club thinks may be of interest to them as a benefit of being a member of the Club. Members are able to update their contact preferences online in the My Account area of the website or by contacting [communications@royalautomobileclub.co.uk](mailto:communications@royalautomobileclub.co.uk).

The Club may also send email communications to non-members whose personal details the Club has received through interest in or attendance at one of our events. The Club will only contact them with their consent and they can opt out of future communications at any time by contacting [communications@royalautomobileclub.co.uk](mailto:communications@royalautomobileclub.co.uk).

### **Retention of personal data**

The Club retains personal data for no longer than required in line with our retention schedule which is based on:

- the Club's heritage purpose
- operational requirements
- legislative requirements.

## Security of personal data

The Club takes the confidentiality, integrity and availability of your personal data seriously and has implemented technical and organisational measures to ensure that your information is kept secure. These include, but are not limited to, encryption, access controls and third-party assessments of our facilities.

## Personal data and your rights

Data protection legislation gives you the right to:

- correct any data we hold about you that is not correct (Rectification)
- request we delete data in some circumstances (Erasure)
- block or suppress the further processing of your personal data in certain circumstances (Restriction)
- request access to personal data that the Club hold about you (Subject Access)
- in some circumstances, receive the personal data which you have provided to us, in a structured, commonly used and machine-readable format and have this transmitted to another data controller (Data Portability)
- withdraw consent where this is the legal basis for the Club processing your information
- object to processing where the Club is relying on its legitimate interests as the legal ground for processing.

Please contact at [members@royalautomobileclub.co.uk](mailto:members@royalautomobileclub.co.uk) or write to Membership Office, Woodcote Park Epsom, Surrey, KT18 7EW if you wish to exercise your rights in relation to personal data.

If you have concerns about the way the Club has handled your personal data please contact the Club in the first instance. If you remain unsatisfied you can contact the Information Commissioner's Office (ICO) on 0303 123 1113, by emailing [casework@ico.org.uk](mailto:casework@ico.org.uk) or by post at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Last Reviewed: 26 October 2020