

THE HARLEY-DAVIDSON RIDERS CLUB OF GREAT BRITAIN
PRIVACY NOTICE FOR OUR MEMBERS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you have registered to become or are a member of our club. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we**, **our** or **us** in this privacy notice are to the **Harley-Davidson Riders Club of Great Britain** an unincorporated body contactable at PO Box 62, Newton Abbot, Devon, TQ12 2QE.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but the Club Chairman has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, postal and email addresses and telephone numbers
- date of birth
- membership type
- any linked membership(s)
- membership start and end date
- details of any "home" Region preference expressed and whether you consent to your details (excluding address) to be passed to your area representative
- the model and year of any owned motorcycle qualifying for membership
- details of an 'In Case of Emergency' (ICE) contact telephone number and Emergency Information provided.
- details of persons involved in Junior or Associate membership (see Section 3. *Where we collect your information* below)
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us
- cheque, PayPal or other payment related details you provide so that we can receive payments from you and the details of financial transactions with you.
- any disciplinary and grievance information.

If you engage with the Club on any of our social media channels, for example Facebook, you should know that we do not collect your personal information from these origins. It remains within the platform that we are using and so you should familiarise yourself with their privacy notices and policies.

Where you make payments to us, we receive and hold sufficient details as you and/or your bank/payment provider send us. We retain these to enable us to administer your membership or other services you purchase from us and to facilitate our accounting.

Where you provide us with your bank or other payment details in order that we can make payments to you we will hold these until they are no longer necessary or you tell us not to.

You should consult the data and/or privacy policies of any third parties you use to interact with us to ensure you are content with the information they hold and provide us with on your behalf.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

Subject to your choices made, we may also collect, store and use the following "**special categories**" of more sensitive personal information regarding:

- information about your **health**, including any medical condition, allergies, blood group or other information and data you deem to be of use in case of an emergency

In relation to any special category personal data that we do process we do so on the basis that it is based on your **explicit consent**.

In the table below' we refer to these as the "special category reasons for processing of your personal data".

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you apply to become a member of the club, you register an account with us at Membermojo.co.uk/h-drcgb, you register an account with us at www.hdrcgb.org, when you purchase or utilise any services or products we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you provide us with details of family members and emergency contact details, they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us, and preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
To arrange and manage any contracts for the provision of any member services or products	Contact details, transaction and payment information. Records of your interactions with us and products, services or assets obtained.	This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have purchased or loaned from us.
To send you information which is included within your membership benefits package, including any updates or changes.	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our club and in some cases, we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal

information we may not be able to admit you as a member or we may not be able to properly perform our contract with you, comply with legal obligations and we, therefore, may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on basis other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

5. DIRECT MARKETING

Email, post and SMS marketing: We do not currently use direct marketing, any communications sent by email are part of your membership package. Should we use direct marketing in the future this will only be with your consent.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you.**
- **Other service providers:** for example, the supplier of our membership cards, the company printing and mailing the Harleyquin magazine, banking and payment processors, the provider hosting our Club Shop and the provider holding records of assets for our Club Tool Loan Scheme.
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect is not intentionally transferred to and stored in countries outside of the UK and the European Union. However, some of the providers we use do make use of cloud-based services.

8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period of 2 years after the expiry of your membership or your last contact with us.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes - for example if you change your address, phone number or, particularly, your email address. You can review and update the personal information we hold about you through your account at Membermojo.co.uk/h-drcgb at any time and this should be your first port of call. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the **right to be informed** about how your personal information is being used;
- the **right to access** the personal information we hold about you;
- the **right to the rectification** of inaccurate personal information we hold about you;
- the **right to the erasure** of your personal information in certain limited circumstances;
- the **right to restrict processing** of your personal information where certain requirements are met;
- the **right to object** to the processing of your personal information;
- the **right to data portability** should you require the transfer of your data either to you or another service provider; and

- the **right to object to automated decision-making** processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and would encourage you to contact us to resolve your complaint first.

10. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

11. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email membership@hdcrgb.org.uk or write to us at The Membership Secretary, H-DRCGB, PO Box 62, Newton Abbot, Devon, TQ12 2QE.

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Version history

V1.0 – First version drafted and approved by the National Committee on 28 April 2021.