# **European Meeting GDPR Policy**

This policy has been drafted on behalf of those participating European TR clubs who wish to manage and deliver a European Meeting by using a shared website tool herein called the European Meeting Website (EMW). The EMW can be configured for a specific Meeting which will be created, managed and delivered by the host club. Each such Meeting will have its own website pages but the EMW can be used for multiple Meetings by re-configuration each year.

All participating European TR clubs respect individual club member's privacy and we will only use their information in the way we describe in this policy. When using a participating club member's information we aim to be fair, transparent, and to follow our obligations under UK and EU data protection laws. The information referred to in this policy is solely collected and used for the administration of European Meetings within the EMW by the participating clubs.

GDPR require a named person to be accountable for collecting and processing of personal data by companies and clubs. Therefore, Mick Forey, a member of The TR Register's management team is currently the nominated Data Controller for this policy. The Data Controller determines the purposes and means of processing personal data and is responsible for, and has to be able to demonstrate, compliance with the principles. The participating European TR clubs’ office staff, contractors and event organisers are data processors for the specific Meeting and a full list of internal and external parties with which data is shared is found below under **"Sharing Information"** and for any specific Meeting in a document based upon the template given in Appendix 1. The processors are responsible for processing personal data on behalf of the controller and are required to maintain records of personal data and processing activities and will have legal liability if they are responsible for a breach.

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## **Awareness.**

All directors, committee members and other decision makers of all participating European TR clubs responsible for a specific Meeting must be aware of the requirements and impact of the General Data Protection Regulations and be familiar with their responsibilities and obligations. Directors or equivalents of all clubs must review this GDPR policy during the preparation stages of a specific Meeting and accept its obligations on behalf of their club and communicate them to their management team, staff, contractors, data processors and event organisers.

## **Personal data the European Meeting Website holds.**

The European Meeting Website (EMW) collects participating club member's personal data when they sign-up to a specific Meeting. The EMW then holds club member's personal data on a cloud based database management system. The IT system is secure and can only be accessed by authorised people who hold the necessary passwords. The EMW may hold the following personal data of the participating clubs members who have signed up for the specific Meeting and agreed that their personal data is collected, held and processed within the EMW;

• Name

• Date of Birth

• Address

• Telephone Number's

• Email addresses

• IP address

• Car details, including make, model & registration number

• Participating club membership details

## **Using club member's personal data.**

The European Meeting Website (EMW) will only be used to hold and process participating club member's information to administer the specific Meeting that the member has signed up for.

The information will be held in the EMW for only as long as it is necessary for the host clubs to deliver the specific Meeting and keep financial records for a reasonable period. Such a period will not usually exceed 12 months after the Meeting. Following this period all participating club members’ data will be deleted from the EMW, unless the member has opted to allow the EMW to hold their data for a similar Meeting in the future.

No participating club member’s personal data will be shared with other participating clubs membership databases or used to solicit membership or communicate with them except as defined within this policy.

## **The European Meeting Website (EMW)**

When a participating club’s member uses the EMW, it will collect their IP (Internet Protocol) address, by using cookies. Cookies help us to recognise them when they return to the website, and they may also help the member to login securely to our web-based services, including on line entry and payment. For more detail about how we use cookies please view our [Cookies Policy.](http://www.tr-register.co.uk/cookies-policy)

## **Sharing information**

**The data is shared with those responsible amongst the host club for managing and delivering the specific Meeting on a need to know basis. These could include:**

• Host club's Directors, staff, contractors and event organisers who would become data processors.

• For a specific Meeting, the names of the above data processors will be recorded in a document based upon the template given in appendix 1.

**The personal data may be shared externally with**

• Nominated third parties, agreed by the host club, in order to manage and deliver a specific Meeting. These may include printers, venue suppliers and other event management companies

• For a specific Meeting, the names of the above third parties and their data processor will be recorded in a document based upon the template given in appendix 1

All such third party companies must provide their own GDPR policy. These policies will be vetted and cleared by the host club's representatives before data is shared.

The participating clubs will not share data held in the EMW internationally (i.e. outside the EEA).

## **Participating Club Member's rights**

Unless subject to an exemption [under the GDPR], club members have the following rights with respect to their personal data: -

• The right to request a copy of their personal data held within the EMW and a list of locations that data is held and who it is shared with;

• The right to request that the data held within the EMW is corrected if any personal data is found to be inaccurate or out of date;

• The club member may ask participating clubs to stop using their information, and to delete it. If the member asks the participating clubs to delete all their personal data from all locations we will not be able to continue our contract with that member.

• The right, where there is a dispute in relation to the accuracy or processing of a member’s personal data, to request a restriction is placed on further processing;

• The right to lodge a complaint with the Information Commissioners Office ([www.ico.org.uk](http://www.ico.org.uk/)) or equivalent in their country.

## **Subject access requests**

All data and processing requests will be dealt with by the Data Controller with a target to respond to any request within 14 days. It will require two pieces of identification to prove your identity. Please make a written application to the current Data Controller as specified in this policy.

## **Lawful basis for processing personal data**

The participating clubs consider “legitimate interests" [Article 6(1)(f)] as a lawful basis to process personal data. The participating clubs believe this basis is the most appropriate to enable the participating clubs to use the EMW to manage and deliver a specific Meeting. We have checked that the processing is necessary and that there is no less intrusive way to achieve the same result. We have done a balancing test and are confident that individual's interests do not override those legitimate interests. We only use individuals' data in ways they would reasonably expect, unless we have a very good reason.

## **Children**

Children under the age of 18 will not be able to register for a specific Meeting or authorise any payments within the EMW.

## **Data breaches**

Any data breaches will be investigated thoroughly and once the breach details have been found the ICO or equivalent will be informed. If the investigation determines that the breach was intentional and identified the processor then disciplinary action may be taken which could include suspension or dismissal from their participating club. If the investigation determines that the breach was unintentional then action will be taken to modify the process to avoid a similar breach.

## **Data protection**

A “Privacy Impact Assessment" and “legitimate interests balancing test" has been carried out with outcomes being integrated back into this policy.

## **Users Compliance and Security**

All employees, directors, contractors and event organisers from participating clubs that collect or process the above personal data, must read, understand and abide by this policy.

**Appendix 1 – Template for each specific Meeting**

**European Meeting Name:**

**Host club:**

**Nominated data processors and their club name:**

**Nominated third parties and their data processor’s name:**

**Revision history**

Version 1 the original policy drafted by Mick Forey, dated 1 August 2022