Your Privacy

Introduction

The Under 17 Car Club Charitable Trust (the Club) which includes The Under 17 Car Club and Under 17 Drivers Pathfinder respects your privacy.

We abide by the Data Protection Principles established by the Information Commissioner's Office to ensure that your data is:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than is necessary
- Processed in line with your rights
- Secure
- Not transferred to other countries without adequate protection.

We will never rent or sell your personal information to any third party for marketing purposes.

We do need to use some of your information for other purposes, and we've created this Privacy Policy to make sure you're aware of what information we hold and to help you understand how and why we use this information. We also want to be clear that, by providing this information and/or using our website(s), you are consenting to our collection, storage and use of your personal details as set out in this Privacy Policy.

We may need to update our Privacy Policy from time to time to reflect our changing business practices. We will publish any modified or updated versions on our website. This version was published on 22^{nd} May 2018.

The kinds of personal information we collect

To operate to your benefit we need certain personal information.

To enable us to contact you we need:

Names, addresses, email addresses, telephone numbers and contact details for you and your family/ Club Members.

To discharge our duty of care to children and young people we need:

Date of birth for anyone under the age of 18 years. To enable you to contact us we need to generate:

Usernames and passwords to give you access to parts of our website(s).

Depending on the relationship you have with us and your personal circumstances (especially health), we may also need you to provide other personal information, such as billing and payment information, tax status and medical information if such could affect your (or your Member's or Members') ability to drive or control a vehicle or machinery or could affect the safety of others.

There is some information that we do not need to know and do not collect as a matter of normal practice; this includes sensitive personal information such as:

your race, ethnicity, politics, religious or philosophical beliefs, sexual preferences, or similar information.

If you share or provide this information, we may collect it in the sense that this information will be saved on our server(s) and may become stored in our databases. We will treat this sensitive information carefully, in the same way we treat all personal information we collect.

We primarily collect information through sign-up forms, indemnity forms, sign-in sheets and our website. We occasionally collect information in person during meetings, events and by email. We also collect information when you contact us, including through email and/or our Facebook page.

When you choose to connect your social media account to your profile, we will be provided with some information from that social media website. For example, when you connect your Facebook account, we may be provided with the personal information you have made publicly available in Facebook, such as your name, profile picture, cover photo, username, gender, friend networks, age range, locale, friend list, and any other information you have made public. We may also be provided with other non-public information from the social network website with your permission.

Cookies

To better understand how our visitors use our online services and websites, and to help us provide a better experience, we may collect and store information either directly in log files and cookies, or via third party vendors, including Google, that use web tracking technologies, including <u>cookies</u> and <u>web beacons</u>. This information may include pages that you have visited, your IP address, browser type and your operating system. You can choose to disable cookies, but please remember this may mean that parts of the website(s) may not function correctly.

We use third party vendors to display relevant advertisements (ads) for the Club at locations away from our website(s) on the Internet. Some of these vendors, including Google, use cookies to display ads based on your previous visits to any of the Club's websites. You can opt out of the use of your information for online behavioral advertising by NAI member companies by visiting the <u>Network Advertising Initiative opt-out page</u>. You may also click <u>here</u> to opt out of having your data used for online behavioral advertising by Digital Advertising Alliance (DAA) member companies.

The third party vendors we work with may collect information about your online activities over time and on other websites or applications.

How we use your personal information

We generally collect and use your personal information for the purposes for which it was collected, like your name and those of your Members in order to provide training and education services, and username and email address to provide access to certain functions on our website(s) and provide you with information about the Club and its activities, and for internal business purposes.

We may use some of your personal information for research and marketing activities. We may send you promotional messages and useful information about the Club, and these messages may be personalised based on your use of the Club and other personal information you have provided to us. For example, we may let you know about interesting new venues or events based on your age, grade or previous interest.

You may also receive administrative messages from us.

How we disclose your personal information

We may share your personal information with third party service providers, including shipping and logistics companies, banks and payment processing companies, email and web service providers, and data storage providers.

We may share information with governmental agencies or other companies assisting us to prevent or investigate illegal activity. If we believe in good faith that it is necessary to do so, we may also share information to respond to legal process (eg, a court order or sub poena) to protect our property and legal rights and those of our Members or if otherwise required by law. We may also disclose or otherwise transfer personal information to an acquirer, successor, or assignee of all or part of our charitable business, including as a part of any merger, acquisition, sale, or bankruptcy.

When appropriate, we may wish to share some of your personal information with a trusted third party but, *before doing so, we would provide you with reasonable notice and give you the option to opt out.* For example, by virtue of becoming members of the Club you will become affiliate members of IAM RoadSmart (formerly The Institute of Advanced Motorists) for so long as the Club maintains its collaboration with the IAM and you continue to be Members of the Club. To that end the Club may provide to the IAM such information as is necessary for that affiliate membership to be given effect. This will include but is not limited to your names, addresses, dates of birth, email address and telephone number(s).

How we keep your information secure

While we take reasonable steps to keep your information secure, no security system is impenetrable and, due to the inherent nature of the Internet, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise, will be absolutely safe from unauthorised access by others. Your payments, if made online, are handled over an encrypted connection or via a secure third party processor. Access to personal information on our databases is restricted to authorised staff only. As appropriate, we require our service providers with access to personal information to sign agreements that require them to take steps to protect the information.

If you require help with using the Club's services, our support team may ask you to confirm some of your private information, such as your name, home address, or other relevant identifying information. The Club will never email you directly and ask for these details unless you have requested help or support.

International Transfers

All data and information provided directly to the Club is held on servers located in the United Kingdom of Great Britain and Northern Ireland and is subject to UK Data Protection legislation. Where you provide data or information to the Club via Social Media (ie, Facebook or Twitter) such data will be held by us in accordance with this policy but is held by those service providers under such terms as you have agreed with them (see third party services).

Children's privacy

Our website and services are not directed to individuals under the age of 11 although we do maintain a waiting list of prospective members who may be under the age of 11 years. We do not knowingly collect personal information from children under 11, only from their parents or guardians. If we become aware that a child under 13 has provided us with personal information, we will take steps to delete such information. If you become aware that a child under 13 has provided us with personal under 13 has provided us with personal information, please contact us.

Third party services

The site may contain features or links to websites and services provided by third parties, such as social media networks. Any information you provide on third party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through our site. We are not responsible for the content or privacy and security practices and policies of third party sites or services to which links or access are provided through the site. We encourage you to learn about the third parties' privacy and security policies before providing them with information.

How you can access or correct your personal information or make a complaint

If you have any complaints, comments or questions about the way we collect and use your personal information, or if you would like to access or correct your personal information, please just tell us.