



## MORECAMBE BAY ESTUARIES ADVANCED MOTORCYCLISTS

### GENERAL DATA PROTECTION REGULATIONS 2016

### PRIVACY POLICY, PRIVACY NOTICE & DATA RETENTION POLICY

#### Document Control & Approval

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## **A. Scope and Limitations**

This policy applies to all personal data handled, stored and processed by Morecambe Bay Estuaries Advanced Motorcyclists (MBEAM). We may change this Policy from time to time.

## **B. Purpose**

The main purpose of this policy is to outline how MBEAM will handle, store and transmit personal data in order to ensure appropriate measures are taken to protect data in line with risk. This Policy and Notice covers MBEAM in relation to the collection and use of the information that MBEAM members give us.

## **C. Who we are**

MBEAM is an independent registered UK road safety charity, affiliated to IAM RoadSmart, as part of their support for Associate Members preparing for the advanced motorcycling test. We exist to improve rider skills through coaching and education:

- “For the public benefit to promote the improvement of the standard of driving and the advancement of road safety”.
- “Improve road safety by raising riding standards and Prepare people for their Advanced Riding Test.

MBEAM is run by volunteers who are - Team Players, Leaders, Empowered and Passionate about road safety and enjoying motorcycling: we believe in what we do and the difference it can make for motorcyclists, which drives us to be our best.

Our activities fall into distinct areas that are intended to complement each other. They are:

- Providing advanced rider training through:
  - National Observer training
  - Local Observer Assessor training
  - Local Observer training
  - Quality Assurance activity – maintaining consistency & quality
- Promoting & sustaining MBEAM membership through:
  - Ride leader training & support
  - Bike Safe & events
  - Assessments & Refresher training for MBEAM members
  - Masters

## **D. Data Set Identification and Definition**

For the purposes of these Policies and Notice - data is information which is:

- (a) being processed by a computer or other electronic device
- (b) is being recorded in order to be processed by a computer or other electronic device
- (c) is a paper-based record

This policy is also only concerned with data which is defined as Personal Data: “Data which relate to a living individual who can be identified:

- (a) from those data, or
- (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller,

And includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual". This also includes Sensitive Personal Data which includes:

- (a) Racial or ethnic origin
- (b) Political opinions
- (c) Religious beliefs or other beliefs of a similar nature
- (d) Trade union membership
- (e) Physical or mental health or condition
- (f) Sexual life
- (g) The commission or alleged commission by the data subject of any offence
- (h) Any proceedings for any offence committed or alleged to have been committed by the data subject.

## 1. Introduction

The GDPR (General Data Protection Regulation) is EU legislation. Whilst the UK remains in the European Union, the GDPR applies automatically and Morecambe Bay Estuaries Advanced Motorcyclists (MBEAM) has had to comply with it since its implementation on 25 May 2018. If the UK leaves the EU it would still need its own data protection legislation such as GDPR or equivalent.

GDPR does not just lay down the principles of what needs to be achieved but, in many cases, says exactly what we have to do to be compliant. The key aspect of data protection under the GDPR is an accountability principle, meaning that an organisation not only has to comply but it has to be able to demonstrate that it complies.

MBEAM has specific data and information management responsibilities in relation to those responsibilities held by IAM RoadSmart under GDPR. MBEAM for the purpose of GDPR in part of its relationship with IAM is a Data Processor because it an IAM RoadSmart Group and IAM RoadSmart is in this case the Data Controller. IAM RoadSmart will provide a Contract to all its members which will be sent to all its existing members (at least once) and new members upon joining.

MBEAM also collects Data from its Members, Associates and Affiliates, in order to operate and function as an organisation. In this case MBEAM becomes the Data Controller in relation to that data. There is an important distinction here, in simple terms, when IAM RoadSmart (as Data Controller) passes MBEAM details of a new Associate allocated to MBEAM (as Data Processor) those details can only be used for the purpose of delivering Advanced Rider Training. Therefore, MBEAM needs GDPR policies and procedures that ensure compliance with both elements of being a data controller and a data processor.

MBEAM must manage its data effectively and in compliance with data protection and other regulations. MBEAM collects, shares, holds, stores and creates data and information. This policy and procedures provide a framework of retention and disposal of categories of information and documents, thereby ensuring MBEAM meets its obligations in relation to data management.

The implementation of these guidelines demonstrates the commitment to the principles of data protection, including the principle that information is only to be retained for as long as necessary for the purpose concerned.

Fundamental to this principle is the creation of a nominated 'MBEAM Data Manager' which would normally be held by an individual Committee member of the MBEAM. In the absence of the role or the role is not recruited to, then responsibility for the overall MBEAM management of GDPR will fall to the MBEAM Trustees as defined by the Charity Commission. See Annex 3 for MBEAM Data Manager role and responsibilities.

MBEAM has reviewed its data and processes and has followed the IAM RoadSmart guidelines to establish a complaint way of working to meet GDPR requirements; see checklist at Annex 6. IAM RoadSmart requires that MBEAM completes the Group Declaration Form (shown at Annex 4) to confirm that MBEAM has received and has implemented the IAM RoadSmart GDPR and Data Management Guidelines for Groups.

## 2. MBEAM commitment to membership privacy

We are committed to protecting the privacy of our members and this policy sets out how we comply with the principles of the GDPR.

MBEAM aims to be very clear when we collect your personal data and will not do anything you wouldn't reasonably expect in order to provide the products and/or services that you request, to communicate with you, and to personalise our information we send to you.

We will process your personal data for the purpose of delivering Rider Training and MBEAM membership.

### **3 Type of data that MBEAM retains**

We will use your personal information in a number of ways which reflect the legal basis applying to processing and controlling your data. To enable us to contact you in relation to rider training, managing your MBEAM membership, group activities, sharing news, and social events we need to collect a minimum set of personal data:

- Name
- Address
- Year of Birth
- Contact details

We record such data, in various electronic forms, including our MBEAM membership database which has the contact information that IAM RoadSmart send to us when Associates are allocated by IAM RoadSmart to MBEAM. We supplement this basic Associate information with further personal information for the purposes of:

- Managing MBEAM membership
- Delivering advanced rider and observer training
- Providing membership information and organising and undertaking social events and activities

This data and information includes:

- MBEAM membership status
- MBEAM observer status
- MBEAM observer training records
- 'In case of emergency' contacts (ICE)
- Banking information

Third party data is also kept where it is necessary to the administration and delivery of those matters listed above. Third parties include:

- Police – named officers for collaborative training
- Fire Service – named officers for collaborative training
- Cumbria County Council – delivering of road safety activity and grant support
- Neighbouring Advance Motorcyclist Groups – delivery of collaborative training

### **4 What MBEAM does with personal data**

MBEAM members will receive general notifications and information about training, committee activity and committee events, group news, group social events and advanced motorcycling and road safety. [Definitive list of MBEAM data sets can be found at Annex 1.](#)

### **5 What MBEAM doesn't do with personal data**

We will not use personal data for any other purpose than would be reasonably expected. For example:

- MBEAM Treasurer may hold Group member personal bank details
- MBEAM Chief Observer may hold Observers and Associates personal details and records

- MBEAM Committee & Officers may hold details of those willing to assist at events
  - MBEAM Observers may hold details of Associates while under instruction
- Definitive list of MBEAM datasets can be found at Annex 1.

## **6 MBEAM members rights to control use of their personal data**

We follow strict security procedures in the storage and disclosure of information that Group members have provided to us. You have the right to object to this data processing. All MBEAM members have legal rights to control what MBEAM can do with their personal information. For example:

- the right to be informed about the collection and use of personal data
- the right to access the information we hold
- the right to correct or update information we hold
- the right to have the information we hold erased (except that mentioned above)
- the right to restrict or suppress personal information
- the right to obtain and reuse personal data for their own purpose
- the right to object to the processing of personal data in certain circumstances

MBEAM members will be provided with a Group Member Statement regarding GDPR and personal data options when joining MBEAM and annually when their membership is due for renewal. This form is shown at Annex 5.

Any MBEAM member can exercise these rights at any time by emailing the MBEAM Data Manager at [datamanager@mbeam.org.uk](mailto:datamanager@mbeam.org.uk). Exercising these rights may mean that we are no longer able to provide members with access to our services.

Members also have the right to withdraw from receiving general notifications at any time by emailing the MBEAM Data Manager at [datamanager@mbeam.org.uk](mailto:datamanager@mbeam.org.uk). If so, we will only make contact regarding MBEAM membership renewal.

Members may request all data be removed; we require some data for membership management therefore a request for complete deletion of data also means leaving MBEAM. We retain the right to keep certain data if it is required for statutory, legal purposes and/or investigatory proceedings.

## **7 Use of other personal data and information by MBEAM**

Pictures, videos, news articles, and written updates of MBEAM events such as training, committee and social events at which MBEAM members may be in attendance or referred to, may also be published on our web-based Forum, Facebook group, newsletters, and the MBEAM website.

MBEAM would like to use members photographic images and limited personal data (names) for publication through the media listed above. This publicity data will be made available via the Internet and therefore anyone with internet access may be able to access the data; MBEAM will not have total control of this data once published. Members and previous members can request their publicity data be removed and opt out of MBEAM holding this data (see section 6).

## **8 Data Security undertaken by MBEAM**

MBEAM will ensure that personal data is stored electronically in a secure fashion. This will be done using appropriate up to date software and documents, files, folders, systems, devices and hardware are encrypted and password protected. And appropriate back-up and disaster recovery solutions will be in place.

Access to personal data shall be limited to only those MBEAM personnel who need access and appropriate security will be in place to avoid unauthorised sharing of information.

When personal data is deleted this will be done safely such that the data is irrecoverable.

## **9 Personal data retention (policy and practice)**

We will generally only hold personal information for the period of MBEAM membership, in some cases this may be extended to one year beyond membership. Definitive list of datasets and associated retention action is provided at Annex 2.

Some exceptions to this apply where some information might be retained after the membership period with us has come to an end. For example:

- Fulfilment of our HMRC statutory obligations; it may be necessary for MBEAM to keep records of payments made for at least six years.
- Some information may be retained indefinitely for historical, statistical or research purposes.

Paper records will be shredded before being disposed of. Personal data held on personal electronic equipment (phones, tablets, USB storage, and computers) will be removed before they are disposed of.

Where possible paper data and duplication of data will be avoided. Electronic data will be password protected. Shared data, for example on a on server / database will be password protected and access given only to those who need it and only to the sections relevant to their role.

## **10 Disclosure of data to third parties**

We will not share member details with third parties except:

- Where we are required to deliver a product or service
- Where we are required by law and by law enforcement agencies, judicial bodies government entities, tax authorities or regulatory bodies
- Where we have members specific and individual permission

## **11 General data handling and security**

GDPR imposes greater restrictions on us with regard to the data we can legitimately collect and use. The previous sections have identified the type of data we need to function. And we have no need to hold data that we have accumulated in the past.

Given this the legislation calls for data to be cleansed to comply with the GDPR and IAM RoadSmart policy. Any excess data must be destroyed immediately.

Circulation lists that are used to keep members informed of events, and the use of Social media platforms to publicise activities and achievements, under GDPR, require a contract with our existing members utilising the form outlined in Annex 5. The contract provides members with the option to withdraw from the contract at any time.

It is also necessary to renew this contract on an annual basis, by issuing it with our membership fee collection notice.



All data that we hold has to be securely stored and protected. Documents held electronically (preferred method) must be password protected with access rights only granted to designated officers who have a necessary and legitimate purpose for access.

This will be the responsibility of the MBEAM Data Manager or nominated trustee, who will also be responsible for providing individuals with their right to view what data is held by you, on them.

MBEAM will register as a Tier 1 category within the GDPR Guidelines as a Charity, there will be an annual £40.00 fee payable to the Information Commissioners Office.

## **12 Reporting data breaches**

A personal data breach can be broadly defined as a security incident that has affected the confidentiality, integrity or availability of personal data. In short, there will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable, for example, when it has been encrypted by ransomware, or accidentally lost or destroyed.

We are required to notify the Information Commissioners Office (ICO) within 72 hours if, when a personal data breach has occurred, we establish that it is likely that there will be a risk to people's rights and freedoms; if it's unlikely then we don't have to report it. However, if we decide we don't need to report the breach, we need to document the breach and the decision made.

If a data breach is identified, then the Data Manager must be contacted as soon as is practical. The Data Manager will review the breach to determine if MBEAM is required to inform the ICO. More details here: <https://ico.org.uk>

## ANNEX 1 – MBEAM DATA SETS (format, responsibility and description)

The Data Controller in this case is MBEAM. No Data Processors are used by MBEAM to process data on our behalf. MBEAM handles, stores and protects (collectively defined as processing) the following Personal Data Sets:

Data set	TYPE	Responsibility	Description
MBEAM Membership	Electronic (database, spreadsheet) and paper (forms, filing)	Membership Secretary	Information about current members. Personal data held: Name, address, contact details, IAM number, membership status details such as payment status. Core personal data captured from IAM DTE database.
Associates assigned to MBEAM	Electronic (database, spreadsheet) and paper (forms, filing)	Membership Secretary (Associate Administrator)	List of new associates assigned to MBEAM by IAM. Personal details held include: Name, address, email address, year of birth, phone number, IAM membership number and enrolment date.
Associate administration	Electronic (database, emails, phone contacts, spreadsheet)	Associate Training Administrator	<i>List of current and previous associates provided by IAM DTE database or via the Membership Secretary. Used to assign associates to observers and manage their training progress. Personal data held: Name, email address, phone number, home town, availability for training.</i>
Observers (personal to role)	Electronic (database, spreadsheet) and paper (forms, filing)	Chief Observer	List obtained from IAM DTE website for local use. Used to provide MBEAM current observer list for observer management, training and quality

			assurance. Personal data held: name, address, email address, phone number, training and qualification history and availability.
Observer Team Leaders	Electronic (database, email, phone contacts, spreadsheet) and paper (forms, filing)	Chief Observer	Observer team details, personal data includes name, address, email address, phone number, availability. Assigned associates, personal data includes: Name, email address, phone number, home town, availability for training.
Observers (associates assigned)	Electronic (emails, phone contacts, spreadsheet) and paper (forms)	Chief Observer	Assigned associates; personal data held includes: Name, email address, phone number, home town, availability for training. In addition – in case of emergency contact details. And final assessment/mock test reports.
Newsletter	Electronic (word, publisher)	Newsletter Editor (Committee Member)	List of email addresses of members and interested parties who receive MBEAM newsletter. Personal MBEAM member names, contacts and images included in newsletter content.
Ride Leaders	Electronic (database, spreadsheet)	Events & Promotion Officer (Committee Member)	List of MBEAM Ride Leaders personal data includes - email addresses, phone numbers.
Group mailing list	Electronic (database, spreadsheet)	Membership Secretary	List of MBEAM email addresses of those members wishing to receive

			information about MBEAM management and its activities.
Regalia	Electronic (database, spreadsheet)	Regalia Officer (Committee Member)	Personal data including name, address, contact for those members ordering and purchasing MBEAM regalia.
Events & promotion	Electronic (database, spreadsheet, email, phone contacts, facebook, forum) and paper (forms, leaflets)	Events & Promotion Officer (Committee Member)	Personal data including name, address, contact for those members interested in or participating in events and activities organised for MBEAM members.
Event and activities participants	Electronic (database, spreadsheet, email, phone contacts, facebook and forum) and paper (forms, filing)	Events & Promotion Officer, (Ride Leader), (Committee Member)	Personal data held in the planning, organising and execution stages of such events and activities. Personal data includes: name, address, contact for those members and where necessary in case of emergency contacts.
Finance and accounts	Electronic (database, spreadsheet, ledger, statements, expense forms) and paper (forms, filing, statements, cheque stubs)	Treasurer	Gift aid, personal data includes: Name and address, date form signed, donation date and value. Annual financial records, personal data includes: full name, address, transaction date and value. Bank statements, cheque stubs, expense claims: names.
Secretariat	Electronic (database, spreadsheet, emails) and paper (forms, filing)	Secretary	Documents include – agendas, minutes, papers and reports relevant to the administration of MBEAM through its

			Committee as a charitable organisation. Documents will include personal data regarding the names of Committee Members and members.
Committee	Electronic (database, spreadsheet, emails) and paper (forms, agendas, minutes, reports)	Secretary (Chair)	Documents include – agendas, minutes, papers and reports relevant to the administration of MBEAM through its Committee as a charitable organisation. Documents will include personal data regarding the names of Committee Members and members.
Website - MBEAM	Electronic	Webmaster (Committee Member)	Personal details included: names of committee members and any members in specific content. Bespoke Privacy Policy published on the MBEAM website.
Forum - MBEAM	Electronic	Webmaster (Committee Member)	Personal MBEAM member details included: names of members in specific content.
Third parties	Electronic (database, email, phone contacts, spreadsheets)	Membership Secretary, Chair, Secretary, Events & Promotion Officer, Webmaster	Personal data held relevant to various third party individuals and organisations associated with delivering and support of MBEAM objectives. Includes – Police, Fire Service, Cumbria County Council, other Advanced Motorcyclist groups.

## ANNEX 2 Data Retention policy and practice - destruction and removal of records

We will generally only hold personal information for the period of MBEAM membership. Should an individual request that all their records are destroyed, MBEAM will delete all information related to that individual however their membership will also end as we must keep minimum information about all members to fulfil certain statutory obligations (see section 6).

Data held	Retention period for personal data	Exceptions
Membership	On leaving MBEAM.	Retained longer if there are any ongoing legal/investigatory proceedings.
Associates	On leaving MBEAM.	Retained longer if there are any ongoing legal/investigatory proceedings.
Observers	1 year after observer status expired.	Unless observer requests their data be removed. Retained longer if there are any ongoing legal/investigatory proceedings.
Observer training & assessment forms, qualification status	1 year after observer status expired.	Unless observer requests their data be removed. Retained longer if there are any ongoing legal/investigatory proceedings.
Associate run sheets, mock test reports and associate IAM examination reports.	At completion of IAM examination or the advanced course is abandoned.	Unless associate requests their data be removed. Retained longer if there are any ongoing legal/investigatory proceedings.
Associate training tracker	At end of the operational year in which they passed (or undertook) their IAM examination.	Unless associate requests their data be removed. Retained longer if there are any ongoing legal/investigatory proceedings.
In case of emergency contacts (ICE)	For associates - kept for duration of their training and mock test only. Events and activity participants (including Ride Outs) – kept for planning and the duration of the event only.	Retained longer if there are any ongoing legal/investigatory proceedings.
Associate feedback	At end of the operational year in which they passed (or undertook) their IAM examination.	Unless associate requests their data be removed. Retained longer if there are any ongoing legal/investigatory proceedings.

Member advanced status re-assessments	At completion of re-assessment.	Retained longer if there are any ongoing legal/investigatory proceedings.
Ride Leaders	At end of their active ride leadership.	Unless Ride Leader requests their data be removed. Retained longer if there are any ongoing legal/investigatory proceedings.
Regalia	On completion of transaction – order placed, payment made and goods delivered.	Unless on-going issues with goods or service purchases - retained longer if live legal/investigatory proceedings.
Events & promotional activity	On completion of the event or activity – promotion, bookings, payment where appropriate and event or activity completed.	Unless on-going issues with goods or services purchase - retained longer if live legal/investigatory proceedings.
Finance and accounts	7 years in accordance with necessary legal / statutory requirements.	Unless on-going legal/investigatory proceedings.
Secretariat	Personal details of general members kept until passed to MBEAM Membership Secretary only. Master set of MBEAM Committee documents, including Committee meetings, AGM notices, officer nominations and appointments, agendas, reports and minutes kept minimum of 10 years (subject to review to meet charitable and other statutory organisational requirements).	Unless on-going legal/investigatory proceedings or committee matters of a none statutory nature are still subject to committee procedures and resolution.
Committee	Committee members only keep documents relevant to committee business until the specific matters being dealt with in those documents are concluded.	Unless on-going legal/investigatory proceedings or committee matters of a none statutory nature are still subject to committee procedures and resolution.
Website	Personal data exists for duration that the web content it is within remains on the website.	Member can stipulate on contract statement if they do not want to be included featured in Forum / newsletter / Facebook updates.
Forum	Personal data exists for duration of Forum membership.	Member can unsubscribe from the Forum whenever they choose to.
Facebook group	Personal data exists for duration	Member can unsubscribe

	of Facebook group membership.	from the Facebook group whenever they choose to.
Group mailing list – All MBEAM members	For duration of membership.	Member can stipulate on contract statement if they do not want to be included in contact lists.
Mailing list – Observers	For duration that observer status is held.	Observer can request they are removed from mailing lists.
Mailing list - Newsletter	For duration of membership or third parties state they want to be included.	Member can stipulate on contract statement if they do not want to be included in contact lists.



**ANNEX 3 MBEAM Data Manager role and responsibilities**



**MBEAM ROLE PROFILE**

**DATA MANAGER - GDPR**

<b>PURPOSE:</b>	
<b>1</b>	The Data Manager as part of the Committee will ensure that MBEAM operates in accordance with GDPR and IAM RoadSmart guidelines.
<b>2</b>	To manage data collected, used, stored, retained and destroyed in line with GDPR and IAM RoadSmart guidelines

<b>ACCOUNTABILITIES:</b>	
<b>1</b>	To provide guidance to data holders in line with GDPR and IAM RoadSmart guidelines.
<b>2</b>	To ensure records of contract and all data used by the group is – accurate, securely held, used in accordance with GDPR guidelines, retained and securely destroyed.
<b>3</b>	Report any breaches in data protection to IAM RoadSmart and the appropriate authority
<b>4</b>	Ensure the correct GDPR notices are included in all group communication to associates and members.
<b>5</b>	Manage any request of the option to withdraw by associates/members.
<b>6</b>	To review relevance of historical data.

<b>ATTRIBUTES:</b>	
<b>Essential</b>	<b>Desirable</b>
Sound knowledge of GDPR and IAM RoadSmart Guidelines.	Good interpersonal skills Adept in use of IAM DTE system
Sound knowledge of MBEAM GDPR policies, procedures and guidance.	
IT literate.	

**ANNEX 4: IAM RoadSmart Group Declaration Form**

**General Data Protection Regulation (GDPR) Guidelines Receipt and Implementation Declaration**

To : Head of Field Service Delivery

IAM RoadSmart

1 Albany Place

Welwyn Garden City

Hertfordshire

AL7 3BT

Email:- [Amanda.smith@iam.org.uk](mailto:Amanda.smith@iam.org.uk)

Morecambe Bay Estuaries Advanced Motorcyclists hereby declare that :

- We have received the IAM RoadSmart guidelines regarding the management of personal data in relation to members of IAM RoadSmart and the group
- We understand the requirements to securely destroy all historical data relating to non-active members, no matter which format it is held in such as digital or hard copy etc.
- We understand the recommended types of data that can now be held and the relevant retention periods.
- We understand the necessary statement that is required to be issued to all group members regarding communications and activities that may receive or be part of.
- We will implement the guidelines as recommended and gain further clarification or advice on any items that we are not sure of.
- We have reviewed the requirement of registering with the Information Commissioner's Office.

We also acknowledge that we shall make another declaration to state any change in any matter contained in this declaration immediately before the change occurs.

<p>Group Chair</p> <p>Signature :</p> <p>Name :</p> <p>Date :</p>	<p>Group Secretary</p> <p>Signature :</p> <p>Name :</p> <p>Date :</p>
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Note – (a) Please put a  in the appropriate box

## **ANNEX 5: MBEAM Group Member Statement**

### **Morecambe Bay Estuaries Advanced Motorcyclists Contract Statement to Members**

MBEAM would like to thank you for becoming / renewing your membership with us, as part of your membership contract with us, we will contact you with information on training, committee, and social events, together newsletters / magazines relating to the group and Road Safety.

Pictures, videos and written updates of MBEAM events such as training, committee and social events at which you may be in attendance or referred to, will also be regularly published on Social Media sites, group newsletters / magazines and group related websites.

MBEAM also share your information with IAM RoadSmart in order to administer membership activities.

### **Option to Withdraw from the above**

You have the right to withdraw from receiving or participating in any of the above, by contacting MBEAM.

I do not wish to:-

Receive information on training, committee, and social events, together newsletters / magazines relating to the group and Road Safety.

To appear in or be referred to in or on any group social media sites such as Facebook, Twitter etc, group newsletters / magazines and group related websites.

Signature: \_\_\_\_\_

Name (in capitals): \_\_\_\_\_

Date: \_\_\_\_\_

Membership Number \_\_\_\_\_

Please notify the MBEAM Data Manager by email to: [datamanger@mbeam.org.uk](mailto:datamanger@mbeam.org.uk)

**ANNEX 6: MBEAM GDPR compliance checklist**

What to do	Assigned to	Date Completed
1. Appoint a Group Data Manager or Trustee to fulfil the role		
2. Create a full inventory of all Group members that hold data <ul style="list-style-type: none"> <li>I. Type of data</li> <li>II. Media held on (Electronic, Hardcopy etc.)</li> <li>III. Establish whether its secure</li> <li>IV. Establish whether its relevant to their role in the group</li> <li>V. Establish its use</li> <li>VI. Establish its age</li> </ul>		
3. Review the types of data held, and align with guidelines as appendix ii		
4. Implement a data security protocol for all data shared with members of the group <ul style="list-style-type: none"> <li>I. Lock Data</li> <li>II. Password protect</li> <li>III. Enforce its only to be used for the purpose created and cannot be shared (Privacy Policy)</li> </ul>		
5. Implement the member contract with all existing members		
6. Implement the contract with all new associates		
7. Cleanse all historic data		
8. Organise the secure destruction of all historic data held on members		
9. Implement process to ensure that members that request to withdraw from the contract, have their requirements met, in all sets of data held.		
10. Review the requirement of registering with the Information Commissioner’s Office.		