TR Register (TR OWNERS CLUB LIMITED) Privacy Policy

This document's purpose is to be published online at: www.tr-register.co.uk/privacy-policy

1 INTRODUCTION

[TR Owners Club Limited (TR Register), "Us", "We", "Our") registered in England and Wales under company number 1499634 is the data controller of your Information for the purposes of the Data Protection Act 2018 (the "Act"). We respect your privacy and we are committed to protecting your personal information as that term is defined in the Act ("Information"). We comply with the principles of the Act and aim to maintain consistently high levels of best practice in our processing of your Information. Please read in conjunction with our <u>Terms and Conditions</u>, our <u>Cookie Policy</u> and our policy for the GDPR.

This Privacy Policy ("Policy") is intended to inform you how we collect, use and disclose your personal data. This Policy is intended to assist you in making informed decisions about your Information when using our website or the services provided by us. Please take a minute to read and understand the Policy.

By using our website and services you consent to our collection and use of your Information as described in this Policy. If we change our Policy and/or procedures, we will post those changes on our website to keep you aware of what Information we collect, how we use it and under what circumstances we may disclose it. Your continued use of the website or services after this Policy has been amended shall be deemed to be your continued acceptance of the terms and conditions of this Policy, as amended. We encourage you to bookmark this Web page and review this Policy regularly.

In addition to this Policy, each service offered by us may have additional privacy provisions that are specific to the particular service. These supplemental disclosures are made adjacent to the particular service at the time your Information is collected.

2 WHAT INFORMATION DO WE COLLECT?

All your Information will be held and used in accordance with the Act where applicable. If you want to know what Information we collect and hold about you, please write to our Data Controller Jo Whitty at: office@tr-register.co.uk. When you visit and use our website, request our services or join the TR Register Car Club you may provide us with or we may collect your Information such as your postal address, email address and other personal information. You may provide or we may collect this Information in a number of ways:

2.1 Information you voluntarily provide to us

We collect and maintain Information that you voluntarily submit to us during your use of our website or services. For example:

- •When you register on our website or for a service, you may provide us with certain Information including your name, email address, screen name, password and demographic information
- •Where our website contains a social networking function, such as on our Forum or Members Area, you may create and add to your profile by providing Information about your interests
- •If you sign up to receive a newsletter, a magazine, enter a contest or participate in social networking activities such as using our forum, you may provide us with contact information (e.g., email, telephone and/or or physical address)
- •You may provide us with Information in the course of email, member support interactions and surveys.

You can choose not to provide us with certain Information, but this may stop you from gaining access to a service or limit the features that you can use on our website. For more information, please see the "How We Use Your Information" section of the Policy below.

2.2 Information we collect through your use of our Website

As you use our website, Information may also be passively collected by us through our use of cookies and other technologies. This Information allows us to deliver more helpful information, services, tools and advertisements. Please see our Cookie Policy for more information.

3 HOW WE USE YOUR INFORMATION

We will use your Information in the ways described below and as described at the time that the Information is collected.

3.1 To Provide the Services

In general, we use your Information as necessary or appropriate for the TR Register Car Club's purposes including to:

- •Administer your account where you have opened an account with us
- •Register you and provide you access to the website or services requested by you
- •Respond to inquiries or requests that you direct to us
- •Fulfil your requests for products or services
- •Send communications and administrative emails about the website, our services and events.
- •Personalise and better tailor the features, performance and support of the website and our services for your use; analyse, benchmark and conduct research on user data and user interactions with the website and our services
- •Running competitions
- •Other purposes related to any of the above

3.2 Marketing

Where you have provided us with the appropriate consents, or where the Data Protection Act 2018 entitles us to do so, we may send you marketing materials about other car club related products, events or services offered by TR Owners Club Limited (TR Register). However, be assured that we understand the irritations of unsolicited communications and we are fully committed to ensuring the rights and obligations set out in the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003, updated 2016 are respected.

4 HOW CAN I FIND OUT WHAT PERSONAL INFORMATION TR REGISTER HOLDS ON ME?

You have a right to view, amend or delete any or all of the information we hold about you without charge and within 14 days. This is called a subject access request and gives you the right to be forgotten should you feel you wish to exercise that right.

Under the Act you have the right to request a written copy of the Information that we hold about you. It will require two pieces of identification to prove your identity. Please make a written application to the Data Controller, Jo Whitty, Unit 1B Hawksworth, Southmead Industrial Estate, Didcot. Oxon. OX11 7HR.

If any of the Information that we hold about you is incorrect, you can click on the <u>Update my details</u> link on our website. This Information also relates to your magazine subscription so it is imperative to keep it up to date.

5 HOW AND WHEN WE DISCLOSE YOUR INFORMATION TO OTHER ORGANISATIONS

We may share your Information with third parties as specifically approved by you or under the circumstances described below.

5.1 Disclosure for legal reasons

We may disclose your Information if we are under a duty to disclose or share your Information to comply with any legal obligation or in order to enforce or apply or fulfil our terms and conditions and other agreements or protect the rights, property, or safety of our members. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction.

We use a number of third party organisations to help provide a professional service to our members and users i.e. third party suppliers, contractors, local groups, and website designers). These organisations act as data processors and are strictly controlled in how they may/may not use your Information and we remain responsible for the protection of your Information.

5.2 Changes to our Company

In the event we go through a business transition such as a merger with another car club, your Information may be among the assets transferred. You acknowledge that such transfers may occur and are permitted by this Policy.

5.3 Message Boards and Chats

We include message boards, chat rooms, and other interactive forums available as part of our services. You should be aware that any Information which you post to these interactive forums or otherwise choose to make publicly available, may be disclosed and available to all users who have access to that portion of our website or services. By using these interactive forums, you agree that we are not responsible for any Information that you disclose or communicate in such forums, and any disclosures you make are at your own risk.

5.4 External suppliers

Where we may disclose information to third party suppliers of services such as website development, e-Newsletter creation and database maintenance. Those suppliers will only be granted access following the provision of a signed copy of a data processors agreement between themselves and TR Register (TR Owners Club Limited).

6 UPDATING AND CONTROL OF YOUR INFORMATION

There are a number of ways in which you can control the collection, use, and sharing of your Information and update your Information and preferences.

6.1 Opting-Out on Receipt of Email Marketing Communications

When you join the TR Register Car Club, a subscription based organisation, we will contact you in regard to your membership subscription to send you email communications relevant to club activities; this may include but is not limited to, club news, events, invites and other information related to your club membership. Alternatively you may be a non-member who has 'opted-in' to receive email communications from us by signing up to our email newsletter via the website homepage. Following joining the club or opting-in by other means (i.e signing up via the homepage of the website to receive e-Newsletters) you will have the opportunity to "opt-out" from email communications by following the unsubscribe instructions provided in the marketing e-mail or newsletter. To unsubscribe from the TR Register e-Newsletter click the link at the foot of any email or alternatively click here. To manage your member's notifications within the website click here and login. We use a third-party service called Mailchimp for our e-Newsletters, you can view their privacy policy here. MailChimp is certified under the US-EU 'Safe Harbor Scheme', a scheme run by the US Government, to ensure that our data is protected to the same level as it would be if held in the UK. If you have any difficulties with the methods above and require assistance to change your preferences please contact the TR Register Data Controller, Jo Whitty on office@trregister.co.uk.

6.2 Contacting Us

If your information has changed or if you no longer wish to receive communications relating to your club and/or website membership from us then you can amend your Information or update your preferences if you click here.

Please note that:

- •Even if you delete Information, we may retain your Information in conformance with our data retention policy; and
- •We are not responsible for updating or removing your Information contained in the lists or databases of third parties who have been provided with Information as permitted by this Policy.

7 THIRD PARTY LINKS AND SERVICES

Please remember that when you use a link to go from our website to another website or you request a service from a third party, our Policy no longer applies. Your browsing and interaction on any other website or your dealings with any other third party service provider, is subject to that website's or third party service provider's own rules and policies. We do not monitor, control, or endorse the information collection or privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices. This Policy applies solely to information collected by us through our website or services and does not apply to these third party websites and third party service providers.

8 WHERE WE STORE YOUR INFORMATION

The Information that we collect from you is, stored and processed at a destination within the European Economic Area, (all EU countries plus Norway, Iceland and Liechtenstein). Your Information may also be processed by staff operating who work for us or for one of our suppliers, for instance, for customer service purposes. By submitting Information to us, you agree to this transfer, storing or processing. We will take all steps reasonably necessary, including the use of the Model Contractual Arrangements as approved by the EU, or other contractual means to ensure that your Information is treated securely and in accordance with this Policy and the Act.

9 SECURITY OF YOUR INFORMATION

We follow appropriate security procedures in the storage and disclosure of your Information so as to prevent unauthorised access by third parties. We also require those parties to whom we transfer personal information to comply with the same. However, unfortunately, the transmission of information via the Internet is not completely secure. So, we cannot ensure the security of your Information transmitted by you to us via the internet. Any such transmission is at your own risk and you acknowledge and agree that we shall not be responsible for any unauthorised use, distribution, damage or destruction of your Information, except to the extent we are required to accept such responsibility by the Act. Once we have received your Information we will use security procedures and features to prevent unauthorised access to it.

10 SOCIAL MEDIA

We do not control how your personal information is collected; stored or used by such third party sites or to whom it is disclosed. You should review the privacy policies and settings on any social networking site that you subscribe to so that you understand the information they may be sharing. If you do not want your networking sites to share information about you, you must contact that site and determine whether it gives you the opportunity to opt-out of sharing such information. TR Register is not responsible for how these third party sites may use information collected from or about you.

11 ANTI-SPAM POLICY

TR Owners Club (TR Register) provides content of interest to classic car enthusiasts in our emails and aims to tailor them to the specific needs & interests of our club members. We hope you enjoy receiving and reading them.

TR Owners Club (TR Register) has zero tolerance concerning the sending of unsolicited/bulk commercial email - "spam". In respect of this policy, please also refer to our full T&C's and Cookie Policy.

- 11.1 Automated Spam Filtering: We automatically scan all incoming electronic messages and filter out those that appear to be spam. As no system can be 100% accurate in detecting genuine emails from spam, authentic messages may occasionally be filtered. If you believe this may have happened, please contact the recipient by another means.
- 11.2 Unwanted messages from TR Owners Club Limited (TR Register): Any recipient of email communication from us may request, at any time, to unsubscribe. In the unlikely event you are in receipt of email communication from TR Owners Club Limited (TR Register) which could be considered as spam, we encourage you to report it to us by forwarding a copy to us at: office@tr-register.co.uk

We will fully investigate any reports of abuse.

12 HOW TO CONTACT US

If you have any questions regarding privacy or this Policy, you may contact us as follows: Data Controller c/o Jo Whitty, TR Register, Unit 1B Hawksworth, Southmead Industrial Estate, Didcot. OX11 7HR.

Email us: office@tr-register.co.uk

Changes to this Policy

We may amend/update this policy by publishing a new version on this website at any time. Updated 15th April 2018.