



# Data Protection Policy

## Introduction

Hinckley Motorcycle Training Scheme (**the organisation**) needs to keep certain personal data, for example about its staff and customers, to fulfil its purpose and to meet its legal obligations. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this, Hinckley Motorcycle Training Scheme must comply with the GDPR Principles which are set out in The General Data Protection Regulations 2018.

## Principles

Personal data shall:

- Be obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met.
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
- Be adequate, relevant and not excessive for those purposes.
- Be accurate and kept up to date.
- Not be kept for longer than is necessary for that purpose.
- Be processed in accordance with the data subject's rights.
- Be kept secure from unauthorised access, accidental loss or destruction.
- Not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

Hinckley Motorcycle Training Scheme and all its staff who process or use personal information must ensure that they follow these principles at all times. In order to ensure that this happens, we have developed this Data Protection Policy.

## Status of the Policy

This policy has been approved by The Chief Instructor - Hinckley Motorcycle Training Scheme and any breach will be taken seriously and may result in more formal action.

Any member of staff or customer who considers that the policy has not been followed in respect of personal data about themselves should raise the matter with the Chief Instructor of Hinckley Motorcycle Training Scheme in the first instance.

## **Notification of Data Held and Processed.**

All staff, customers and other users are entitled to

- Ask what information the organisation holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed what the organisation is doing to comply with its obligations under the General Data Protection Regulations 2018.

## **Responsibilities of Staff and Customers**

All staff and customers are responsible for:

- Checking that any personal data that they provide to the organisation is accurate and up to date.
- Informing the organisation of any changes to information which they have provided, e.g. changes of address.
- Checking any information that the organisation may send out from time to time, giving details of information that is being kept and processed.

If, as part of their responsibilities, staff collect information about other people (e.g. about customer learning records, E-mail / social media accounts or driving licence details etc.), they must comply with the Policy.

## **Data Security**

The need to ensure that data is kept securely means that precautions must be taken against physical loss or damage, and that both access and disclosure must be restricted. All staff are responsible for ensuring that:

- Any personal data which they hold is kept securely
- Personal information is not disclosed either orally or in writing or otherwise to any unauthorised third party.

## **Rights to Access Information**

Staff and customers and other users of the organisation have the right to access any personal data that is being kept about them on computer and also have access to paper-based data held in certain manual filing systems. Any person who wishes to exercise this right should make the request in writing to the Data Controller - Hinckley Motorcycle Training Scheme. Hinckley Motorcycle Training Scheme will make a charge of £10 on each occasion that access is requested.

Hinckley Motorcycle Training Scheme aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days of receipt of a written request unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.

It is the right of any individual to request that data be removed from electronic or written media. Requests to do so should be directed to the Data Controller - Hinckley Motorcycle Training Scheme in writing.

### **Publication of ATB Information**

Information that is already in the public domain is exempt from the 2018 GDPR Act. This would include, for example, information on staff contained within externally circulated leaflets such as marketing material. Any individual who has good reason for wishing details in such publications to remain confidential should contact the Chief Instructor.

### **Subject Consent**

The need to process data for normal purposes has been communicated to all staff, and to customers at the time of meeting or enrolling on a rider training course. In some cases, if the data is sensitive, for example information about health, race or gender, express consent to process the data must be obtained. Processing may be necessary to operate our organisations policies such as health and safety and equal opportunities.

Promotional subject matter, such as photographs of staff / customers will be used on social media unless expressly requested that it is not (once initial permission has been given to take the images).

### **Retention of Data**

Hinckley Motorcycle Training Scheme will keep information for the period of employment for staff and for the period of training + 24 months for customers.

### **Hinckley Motorcycle Training Scheme's Designated Data Controller**

Hinckley Motorcycle Training Scheme is the data controller under the Act and is therefore ultimately responsible for implementation. However, day to day matters will be dealt with by the Chief Instructor – Nigel Thornber.