

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our members, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to current and former members.

**DATA PROTECTION PRINCIPLES**

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- processing is fair, lawful and transparent
- data is collected for specific, explicit, and legitimate purposes
- data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- data is not kept for longer than is necessary for its given purpose
- data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- we comply with the relevant GDPR procedures for international transferring of personal data

**TYPES OF DATA HELD**

We keep several categories of personal data on our members in order to carry out effective and efficient processes. We keep this data in a personnel file relating to each employee and we also hold the data within our computer system.

Specifically, we hold the following types of data:

- Personal details such as name, address, phone numbers, email address and date of birth
- Name and contact details of your next of kin
- Your gender, information of any disability you have or other medical information
- Information on your race and religion for equality monitoring purposes
- Bus pass information
- Trip history

**COLLECTING YOUR DATA**

You provide several pieces of data to us directly during the membership registration.

Personal data is kept in files or within the Charity’s computer system.

**LAWFUL BASIS FOR PROCESSING**

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage your trip requests and requirements.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carry out the membership application form we send you e.g. using your name, contact details, education history,	Performance of the Membership
Making reasonable adjustments for disabled	Legal obligation
Making Bookings	Our legitimate interests

### SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- Health
- Race

### FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for becoming a member with the charity. This could include being unable to offer you transport.

### WHO WE SHARE YOUR DATA WITH

We will share you data only on emergency with emergency staff or local authorities if we believe there is a problem and your need help. We ensure data is processing in line with GDPR.

We do not share your data with bodies outside of the European Economic Area.

### PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

### RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your membership with us though in some cases we will keep your data for a period after your membership has ended. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below:

Record	Recommended Retention Period
Membership Application forms	6 months to a year

### AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

### MEMBERS RIGHTS

You have the following rights in relation to the personal data we hold on you:

- the right to be informed about the data we hold on you and what we do with it;
- the right of access to the data we hold on you.
- the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as ‘rectification’;
- the right to have data deleted in certain circumstances. This is also known as ‘erasure’;
- the right to restrict the processing of the data;
  
- the right to transfer the data we hold on you to another party. This is also known as ‘portability’;
- the right to object to the inclusion of any information;
- the right to regulate any automated decision-making and profiling of personal data.

### CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

## **MAKING A COMPLAINT**

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

## **DATA PROTECTION COMPLIANCE**

Our Data Protection Officer is:

Sally Gibson  
General Manager  
Keep Mobile  
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