

WOLSELEY REGISTER
GENERAL DATA PROTECTION REGULATION (GDPR)
STATEMENT OF POLICY AND PROCEDURE

The Wolseley Register takes seriously its responsibilities for the proper handling and protection of the personal data of its members and past members. We understand the provisions of the GDPR and have put in place procedures which should ensure compliance.

We must also remind you that your personal data is, indeed, yours and at any time you can ask to see what data the Register holds. You may also request that data is deleted. However, as we make clear on the Membership Application Form, we are a members' club and wish to encourage contact between members. For this reason, we do not allow Members to be completely anonymous and a condition of membership is that your membership, town and country will always be published for the benefit of other members.

It is not just the Officers of the Register who have responsibilities for data protection: Members, too, must behave responsibly. As a Member you have access to the contact details of other Members. You must treat this information with care, not disclosing it to non-members nor using it for any commercial purposes.

Personal Data

The Personal Data we collect and process comprises:

- The names of our members and their contact details, including but not limited to postal addresses, telephone numbers and email addresses.
- The names and contact details of non-members who contact the Club for various purposes, including making purchases from the Club and applying to join club events.

For all on line transactions – membership renewal/regalia or other purchases payment card data is only collected by a highly secure third party and neither the Register nor any of its officers have access to that data.

We do however have a mail order/telephone order facility with which to process credit and debit cards. In order to do this the Wolseley Register has to meet the Payment Card Industry Data Security Standards (PCI/DSS). This is monitored and reviewed regularly through the financial services 'safer payments' procedures with an annual approval process. Each of those officers involved are aware of the requirement for data security and compliance with PCI/DSS and card data is destroyed once the payment process is complete.

Personal data may also be collected on the basis of legitimate interest for both members and non members via both paper and online forms, in order to process enquiries and applications to events.

In all cases personal data is stored securely and is used only in connection with the respective purchase/enquiry/or accounting procedure and may be held for a period of six years in order to deal with updates, claims, recalls, refunds and inland revenue requirements.

We also collect and store data on Wolseley cars. This is not itself, personal data, but may be so when details of a particular car are associated with a named individual.

Why we hold and process personal data

The Wolseley Register is a 'Members' Club', formed over fifty years ago. Membership is open to all persons with an interest in the Wolseley marque across the years of production (1895-1975) and having an enthusiasm to promote the well-being of the Club and the marque.

We charge our members a subscription; we send them copies of the Club's magazine, Wolseley World, by post; and we contact them by post, email or phone for various club purposes. We also facilitate member to member contact. To make all of this possible, we maintain a record of members and their contact details. As well as being visible to the Club's officers, the list of members and their contact details can be seen by all members of the club.

The security of personal data

The membership database is held on a secure server located in a fully protected datacentre in the UK. Data is backed up, also to a UK location, and old backups are deleted after 30 days. Following a request for data to be deleted it will be removed from our live database within 72 hours and will disappear from our backups within 32 days. All communication between Members' web browsers and our server is encrypted using SSL. Our website maintenance contractor and the datacentre operate in compliance with relevant Data Protection legislation and have policies in place to that effect.

Members' data is never shared with third parties other than our web service providers and our printing contractor. All of our web service partners are subject to their own specific Data Processing statements.

Members can access the membership database via the Club's website, using a secure log-in. The membership database is not visible to non-members who visit the website.

The legal basis on which we hold and process personal data

We process members' personal data on the basis that a contract has been entered into which requires us to use data such as postal and email addresses in order to deliver services to members. This data is only used for this purpose and is kept securely.

You will be asked if you wish to consent to your name and contact details being published in our list of members which will allow other members to be able to get in touch with you. You may choose not to give this consent, in which case none of your identifiable personal data will be published to other members.

Members

When new members join the Club, their attention is drawn to this Statement of 'Policy and Procedure' which explains that the provision of personal data is a condition of membership to enable the club to service the needs of its members. The condition of membership also includes the requirement to display non identifiable personal data such as membership number, town and country. Consent is requested to share personal contact information with other members of the club.

When membership ceases contact details are retained on the membership database for up to one year, accessible to the Club's officers, but are not visible to members.

Members have the right to withdraw their consent at any time, from which time, their contact details will no longer be shared with other members. However, if they request that their data is deleted, we will become unable to deliver membership benefits and will therefore terminate the membership after we have deleted the data. Members also have the right to view the data we have collected. This may be viewed and corrected at any time by logging in to the website and going to 'My Profile'.

Non-members & Customers

Personal data of non-members who make enquiries, purchases from, or event applications to, the Register is restricted to the officers of the Register, the data is stored securely and is used only for the purpose of the enquiry or purchase. It is never used for marketing purposes or released to a third party.

Sharing of personal data

The Club will use the personal data of its members solely for the operation of the Club and will not disclose this data to any third parties without explicit consent unless obliged to do so by a UK law enforcement agency.

Responsibilities

- All officers of the Club have a duty to use responsibly the personal data of members and to comply with this policy.
- Members have a duty to treat members information with care, by not disclosing it to non-members nor using it for any commercial purposes
- The Membership Secretary is the Club's nominated Data Controller.
- The Club's Deputy Chairman has the responsibility for ensuring compliance with this policy.