

CHRISTIAN MOTORCYCLISTS' ASSOCIATION UK

Registered charity 1080911



DATA PROTECTION & PRIVACY POLICY

The Christian Motorcyclists Association (CMA) UK is committed to protecting the information we hold about the people we support and work with, and to respecting people's rights around how their information is handled.

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1 – Policy statement

CMA UK is committed to protecting the data we hold and handle, and to respecting the rights of our data subjects (the people whose personal information we collect and use). We do this by complying with relevant laws and seeking to adopt good practice.

This policy has been approved by CMA UK's National Executive and Trustees.

2 – How do we get personal information?

The personal information we process is provided to us by the individuals themselves, such as for one of the following reasons:

- Through the CMA UK's membership application / annual reapplication process
- For those not in membership, through local branch contact information consent forms, or their equivalent
- As part of a church's affiliation to CMA UK
- An individual applies for a post within CMA UK
- An individual wishes to attend, or has attended, a CMA UK event
- An individual has written to us / emailed us / called us
- An individual is representing another organization, either in person or through communications

We do not gather personal information through other organizations or third parties.

We may receive personal information indirectly, such as in the following situations:

- We are contacted by another organization about a complaint and it includes personal information
- From regulators or law enforcement bodies
- Someone in CMA UK membership or employment gives another individuals' contact details as an emergency contact, or as part of a reference

3 – What personal information do we process and why?

The personal information we process is primarily contact information, such as names, addresses (postal and email) and telephone numbers.

Examples of where we process personal data in paper and/or electronic form are:

- To maintain our list of CMA UK's membership
- To keep our membership and local contacts informed of relevant CMA UK news and events
- To organize and manage events such as our National AGM and National Rally
- To recruit, support and manage staff, and those in official roles at the local or national level
- To share prayer requests across our membership where an individual has asked that this is done
- To maintain our accounts and records, and reclaim tax under Gift Aid
- To maintain contact with other organizations, such as CMA organizations in other countries
- To respond to enquiries and to handle any complaints

The General Data Protection Regulation (GDPR, enacted through the UK's Data Protection Act, refers to 'special categories' of data. This is information about a person's racial or ethnic origin, political opinions, religious or similar (e.g. philosophical) beliefs, trade union membership, health (including physical and mental health, and the provision of health care services), genetic data, biometric data, sexual life and sexual orientation.

CMA UK holds 'special category' data relating to an individual's religious beliefs, as a condition of being a Member or Supporter is that the individual has '...accepted Jesus Christ as my Lord and Saviour'.

Individuals may also provide us with limited health information where it is relevant when attending an event (e.g. related to accessibility), and such information is only used in relation to that specific event.

The General Data Protection Regulation defines the basis upon which an organization can lawfully process personal information, with additional criteria for the processing of special category data.

CMA UK's basis for processing personal information is primarily on the basis that individuals have given their consent to do this as part of CMA UK's activities, and that it is processed for the purposes of the legitimate interests of CMA UK or a third party (as noted in 'Sharing information'). In certain cases, the lawful basis would be to safeguard the vital interests of an individual and they are incapable of giving consent (e.g. in emergency, life or death situations).

Processing of 'special categories' of personal data is only lawful when, in addition to the conditions above, one of the extra conditions, as listed in Article 9 of the GDPR, is met. These conditions include where:

- a) the processing is necessary for carrying out our obligations under employment and social security and social protection law;
- b) the processing is necessary for safeguarding the vital interests (in emergency, life or death situations) of an individual and the data subject is incapable of giving consent;
- c) the processing is carried out in the course of our legitimate activities and only relates to our members or persons we are in regular contact with in connection with our purposes;
- d) the processing is necessary for pursuing legal claims.
- e) If none of the other legal conditions apply, the processing will only be lawful if the data subject has given their explicit consent

Further detail on where individual roles have data privacy and protection responsibilities are noted within the CMA UK Handbook.

4 – Data protection

We will seek to adopt data protection good practice, both in our governance, processes and systems.

This includes:

- Being transparent and clear about the data processing activities we carry out
- Making it clear who is accountable and responsible for the oversight and management of data and individuals' 'data subject' rights
- Ensuring we obtain and process information fairly
- Keep information only for one or more specified and lawful purposes
- Process it only in ways compatible with the purposes for which it was given to us
- Keeping it safe and secure, and protecting its integrity and confidentiality, including the use of relevant information security technical controls
- Ensuring it is adequate, relevant and not excessive
- Endeavouring to keep it accurate and up to date
- Retaining it no longer than is necessary for the specified purpose(s), as defined in our CMA UK Information Register

5 – Sharing information

We do not share your information with any third parties for the purposes of direct marketing.

In some cases others may have access to the information we hold, such as to maintain, operate or improve our information technology systems. We will have appropriate arrangements in place (such as contracts) to ensure they cannot do anything with personal information unless we have instructed them to do it, that they will not share it with any organization other than us, and hold it securely and only for the period we instruct.

In some circumstances we would be legally obliged to share information. For example, under a court order or with a regulatory body.

In any scenario we will satisfy ourselves that there is a lawful basis on which to share the information.

6 – Your rights

Under data protection law, you have rights which depend on our reason for processing your information.

- Right of access - the right to ask us for the personal information we hold. There are some exemptions, which means you may not always receive all the information we process
- Right to rectification - the right to ask us to rectify information you think is inaccurate, or to ask us to complete information you think is incomplete
- Right to erasure - the right to ask us to erase your personal information in certain circumstances
- Right to restriction of processing - the right to ask us to restrict the processing of your information in certain circumstances
- Right to object to processing - the right to object to processing in certain circumstances; e.g. for direct marketing, where the processing is not related to a legal claim, or where we cannot demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the individual

- Your right to data portability - This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated

Please contact us at cma-admin@bike.org.uk if you wish to make a request, **including “Information rights request” with your name as the subject header**, and providing your full name, contact details, and clearly describing what your concern is and what you are asking that we do / provide relating to any of your personal information that we may hold.

We have one month to respond to you.

We can refuse to comply with certain requests and in certain situations. For example, by demonstrating that we have a strong reason to continue processing an individual’s data (such as a legal claim) that overrides their request to restrict / objection to processing.

We can also refuse to comply if we believe an objection is, as the law states, “manifestly unfounded or excessive”. This takes into account whether the objection is repetitive. In such circumstances we can request a reasonable fee to deal with the request, or refuse to deal with the objection.