

## **PRIVACY POLICY for the Giulietta Register**

The Giulietta Register is the trading name of The Giulietta Club Ltd registered in England and Wales as a private limited company, number 647733.

The Giulietta Club Ltd ('Register') is committed to protecting the privacy of your personal data. Personal data means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home or other physical address, an email address or other contact information (whether at work or at home). This Policy explains how we protect and manage any personal data you share with us and that we hold about you, including how we collect, process, protect and share that data. It also explains how you can control your data and your rights generally as a data subject, and our procedure in respect of cookies.

There are various ways that you might interact with the Register e.g. when applying for or renewing your membership or using our website. Data collected when you supply your details to the Register or use the website is processed on the basis either that the processing is necessary for the purposes of our legitimate interests or where you have provided specific consent (see below).

### **How We Obtain Your Personal Data**

The Register may collect and record basic data (for example names, email addresses, postal addresses, telephone numbers) which you voluntarily provide via the website, or email, or in writing. We may also collect and record data relating to your car(s) (for example model, registration, year of manufacture, chassis number, engine number, condition). The Register may also use cookies (see below) to collect data pertaining to users of our website, including IP addresses, source domain names, specific web pages, and pages that have been accessed.

We record this information in a secure computer database and use this information in order to manage and administer your membership whilst you remain a member of the Register. Your car data is recorded in a separate secure database by member's name only.

### **How We Use Your Personal Data**

We control data in respect of our directors, management committee members, and members. When you join the Register, we record your details to ensure that we can for example:

- provide a membership subscription service to you
- send you our Magazine which may be in both hardcopy and electronic form
- contact you to provide information applicable to you
- deal with any financial queries.

By applying to become a member or renewing your subscription you automatically agree to receiving marketing offers in the form of our Magazine (currently quarterly). The Register uses personal data which we collect to provide you with services which you request or to improve our existing services. We also use personal data to contact our members with details of club organised or supported events and services, AGM details and invitations to renew membership.

In addition, if you provide your specific consent, we publish your restricted contact details (name, region, country, email address) in a Membership List which is accessible to other members only via our password protected Resources website. If you do not consent to the Membership List we will not provide your contact details to another member without your permission and giving you the reason why we wish to provide it.

When you contact the Register, we may keep a record of your communication to help us respond to your enquiry and to help us resolve any issues that you might be facing.

Your personal data may be retained for a reasonable time and in line with our record retention procedures (financial records for six years and membership details for ten years) for use in any future contact with you, or for future improvements to the Club's services. Car data, when provided, is retained by the Register as a historical record.

The Register will not disclose your personal data to any third party without your permission unless

- we are required by law to do so or
- when the Register believes, in good faith, that such use or disclosure is necessary to protect the rights, property or safety of the Register, its directors, management committee members, or others.

### **Data Subject Rights and Subject Access Requests**

Where we control data you, the data subject, have certain rights such as:

- the right (in certain circumstances) to erase your personal data (and to be forgotten)\*\*
- the right to request inaccurate information about you be corrected
- the right to withdraw consent (where data is being processed on the basis of consent)
- the right to launch a complaint with the Office of the Information Commissioner
- the right via a subject access request to know whether or not we are processing your personal data, the nature of that personal data and the purposes of the processing.

Should you seek to exercise any of the above rights, please use the contact details set out in the Questions & Queries section below.

\*\*Please note that we cannot delete your information where we are required to have it by law, or where it is in printed format, such as past copies of the newsletter or similar publications and already in the public domain.

### **Information About Cookies**

A cookie is a small text file stored alongside your internet browser on your computer or smartphone. It enables us to recognise your computer when you visit our websites. The tool is used by many websites to help collect information, such as how many people visit and return to the website, what products or services are being accessed, to make certain parts of the site function properly and for the purposes of website and system administration. You may choose to accept or decline cookies in the settings of your web browser, but if you disable the cookies you may experience technical issues with some parts of the website.

### **Links to Other Websites**

When browsing the Register websites, you may encounter links to other websites for your convenience and information. These websites may operate independently from the Register, and may have their own privacy notices, statements or policies. We strongly suggest that you review them to understand how your personal data may be processed in connection with those sites, as we are not responsible for the content of non-Register-owned or managed sites, or the use or privacy practices of those sites.

### **Questions & Queries, Who to Contact?**

If you would like to contact the Register about any of the above please write or email to the Membership Secretary at the address listed in the contact details in the Magazine.

### **Policy Changes**

This privacy policy is regularly reviewed to ensure the Register continues to protect your privacy. We reserve the right, at all times, to update, modify or amend this Policy. If any amendments are made, we will endeavour to inform each nominated contact that a change or update has been made. It is our recommendation you take time to review the amended Privacy Policy.

### **If You Have a Complaint**

If you have a complaint regarding the use of your personal data then please contact us. By either writing or emailing the Membership Secretary at the address referenced in Questions & Queries above.