



Official Provider

# Cardiff Group of Advanced Motorists (Cardiff IAM)

## **Privacy Policy**

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Group Data Manager

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## History and revisions

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## Authorisation

Version	Authorised by	Date
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**During this policy “*Cardiff IAM, us, group*” will be used instead of “*Cardiff Group of Advanced Motorists*”**

## 1. Introduction

### **About Cardiff Group of Advanced Motorists:**

Cardiff Group of Advanced Motorists (Cardiff IAM) is a voluntary organisation and a registered charity, Charity Number: 1057448.

We are linked to IAM RoadSmart. Our aim is to improve road safety through training and coaching to IAM RoadSmart advanced driving standards, helping people achieve the Advanced Driving Test qualification.

Through our team of observers, we provide one-to-one training and coaching for new Associates who have joined IAM RoadSmart. You would use us as your local group providing you with local, tailored driver training. We can help you improve your observation and anticipation skills and implement advanced driving techniques to successfully take the Advanced Driving Test and consequently, to become a safer driver.

The group is run by a committee of volunteers who are elected at our AGM. They plan events, coordinate training with observers and ensure the IAM RoadSmart standards are maintained.

You can contact us by phoning our group Secretary on: **07586 338009** or email [Secretary@cardiffiam.co.uk](mailto:Secretary@cardiffiam.co.uk)

Cardiff IAM is registered with the Information Commissioner's Office (ICO) under GDPR.

### **What is GDPR in the UK?**

The Data Protection Act 2018 controls how your personal information is used by organisations, businesses or the government.

The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

Everyone who is responsible for using personal data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary

- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage.

## **2. What type of personal information does Cardiff IAM collect?**

Cardiff IAM currently collects and processes the following personal information:

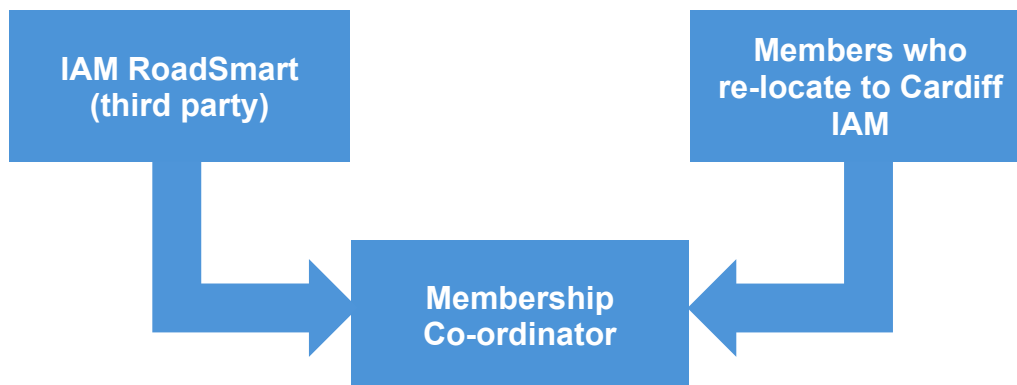
- IAM RoadSmart Membership Number
- Cardiff IAM Membership Number
- Title
- Full Name
- Full Address
- Postcode
- Contact Number (Home & Mobile)
- Email Address
- Cheque Number.

## **3. Personal information Cardiff IAM will not collect:**

Cardiff IAM will not collect the following information:

- Driving Licence number
- Driving conviction information, etc.
- Car Insurance details.

#### **4. How we get your personal information and why we need it:**



Most of the personal information that Cardiff IAM processes is provided to us by a third party (IAM RoadSmart) following purchasing of an Advanced Driving Course. This person is classed as an “*Associate Member*”. Our Membership Co-ordinator will then input their details onto our group membership system.

Or

Sometimes, Cardiff IAM will receive personal information from a current member who has completed a group membership form (***see appendix 1***) to allow them to re-locate to the Cardiff group. The form will then be sent to our Membership Co-ordinator who will add their details onto the group membership system.

#### **5. We use the information that has been given to us in order to:**

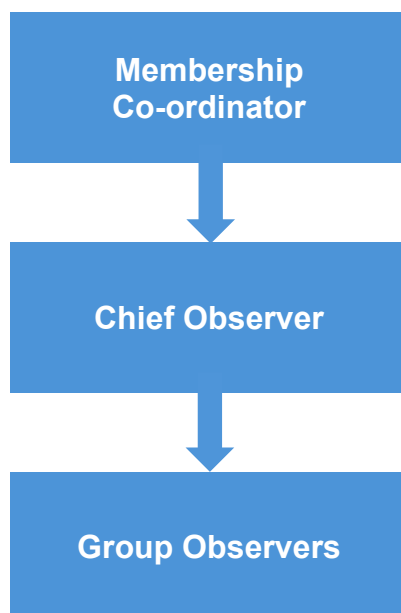
- Register you as a new Associate to the group
- Register you as an IAM Full Member to the group
- Allow our Observers to contact you (as an Associate) to deliver your Advanced Driving course, including access to online training modules
- Allow our Observers to contact you to deliver taster sessions or other ad hoc training
- Allow Cardiff IAM to contact members by email or post about events which the group is putting on
- Allow Cardiff IAM to contact members by email or post about renewing or querying their Cardiff IAM membership
- Allow Cardiff IAM to contact members by email to send out our group newsletters.

**6. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:**

- **Your consent.** By applying for an IAM RoadSmart Advanced Driving course or any taster sessions, you give consent for Cardiff IAM to hold your personal information. You are able to withdraw your consent at any time. By withdrawing your consent, your membership with Cardiff IAM will be terminated and if you are an Associate member, your Advanced Driver course will stop. To withdraw your consent, you should do this by contacting our GDPR officer at [GDPR@cardiffiam.co.uk](mailto:GDPR@cardiffiam.co.uk)
- **We have a vital interest.** Cardiff IAM will only pass your personal information to the emergency services in the event of a medical, or other emergency during an observed drive or at a Cardiff IAM group meeting or event
- **We have a contractual obligation.** When a new Associate has purchased an Advanced Driving course with IAM RoadSmart, their personal information will be passed to Cardiff IAM which has an obligation to train new Associates to complete their Advanced Driving course
- You are not required to pay any fee for exercising your rights. If you make a request, we have one month to respond to you. Please contact us at [GDPR@cardiffiam.co.uk](mailto:GDPR@cardiffiam.co.uk) if you wish to make a request.

## **7. How we will share your personal information within Cardiff IAM:**

Below is a flowchart showing how personal information is shared within Cardiff IAM and the reason why the information is shared.



### **Membership Co-ordinator**

Our Membership Co-ordinator is the first point of contact regarding group membership and is responsible for processing all members' information onto our membership system.

### **Chief Observer**

Our Chief Observer is responsible for all our group Observers. The Chief Observer requires the Associate's personal information to allow him/her to pass your details onto the assigned Observer for the Associate.

### **Group Observers**

The aim of our group Observers is to train and support new Associates to undertake their Advanced Driving course. To allow our Observers to fulfil this role, Cardiff IAM will share the Associate's personal information with the assigned Observer (usually only one Observer is assigned to each Associate and only that Observer will receive the personal information of the Associate being assigned). The information enables the Observer to contact the new Associate to start their course and while delivering their course.



Our Observers will keep the Associate's personal information until any of the following apply:

- The Associate does not wish to continue with their Advanced Driving Course and formally withdraws from IAM Roadsmart and Cardiff IAM
- The Associate is removed from the IAM RoadSmart system (and the Cardiff IAM system) for failing to complete their IAM RoadSmart training and test within 12 months of joining
- The Associate has passed their Advanced Driving Test.

## **8. How we securely store your personal information:**

- All members' personal information is stored securely on our Membership Co-ordinator's group-owned laptop (within a database) to which only our Membership Co-ordinator has access. The laptop is secured by passwords and antivirus software.
- We use Microsoft 365 software, which is password protected, to store and share all group members' personal information. Section 2 of this policy document explains what personal information we store.
- All members' personal information is kept on our membership system for a minimum of 12 months unless cancelled by the member. After 12 months, to remain a member of Cardiff IAM, members are required to renew their group membership. If members do not renew their membership, our Membership Co-ordinator will delete all personal information stored on our membership system and any paper copies will be shredded.

## **9. Your data protection rights:**

Under data protection law, you have rights including:

- **Your right of access**  
You have the right to ask us for copies of your personal information
- **Your right to rectification**  
You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete
- **Your right to erasure**  
You have the right to ask us to erase your personal information in certain circumstances (***This will affect your membership, please see section 6, 'Consent' bullet point***)

- **Your right to restriction of processing**  
You have the right to ask us to restrict the processing of your personal information in certain circumstances
- **Your right to object to processing**  
You have the right to object to the processing of your personal information in certain circumstances
- **Your right to data portability**  
You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

## **10. How long does Cardiff IAM keep your personal information?**

Cardiff IAM will keep your personal information on our membership system while you are a paid-up member of the group until you decide to leave or fail to renew.

## **11. Removal of Data**

If a group member does not choose to renew their membership, then all personal information held by Cardiff IAM will be deleted after 30 days from the lapsed date. The 30 days will give the member time to renew their membership should they change their mind before their personal data is deleted.

Once an Associate has passed their Advanced Driving Test the Observer will return any records made to the Associate. All other information to do with the Associate (e.g. contact details, etc.) must be returned to the Chief Observer for storage while they are still a member of Cardiff IAM. The Observer must delete all stored email addresses and phone numbers that they have on their computers or phones.

If the Associate abandons their course, or was unsuccessful at the test and does not renew the course or book a repeat test, then all data that Cardiff IAM holds will be returned to the Associate or destroyed.

## **12. What is a data breach?**

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

This includes breaches that are the result of either accidental or deliberate causes. It also means that a breach is more than just about losing personal data.

### **13. How do you report a data breach?**

If you have any concerns about our use of your personal information, you can make a complaint to us at Cardiff IAM. Please email your concerns to our GDPR Data Manager using [GDPR@cardiffiam.co.uk](mailto:GDPR@cardiffiam.co.uk)

### **14. What is the process for your complaint?**

Cardiff IAM takes complaints very seriously. Once we receive your complaint, our Data Manager will investigate your concerns and under the data protection law Cardiff IAM must reply to you within one month from the date that we received your complaint. If Cardiff IAM needs something else from you to be able to deal with your request (e.g. ID documents) the time limit will begin again once Cardiff IAM have received these documents. *An example of a complaints letter is shown at Appendix 2.*

If you receive our response following our investigation into your complaint and you don't understand or you are unhappy with it and require further clarification, please contact our GDPR Manager again, giving as much information as you can on what further clarification you require. *An example of a further clarification letter is shown at Appendix 3.*

### **15. What happens if you are not happy with our investigation?**

If you feel that Cardiff IAM has been unable to resolve your complaint satisfactorily and you wish to complain further, you can send your complaint to the ICO using the address shown below:

Information Commissioner's Office  
Churchill House  
17 Churchill Way  
Cardiff  
CF10 2HH

Helpline number: 0330 414 6421

ICO website: <https://www.ico.org.uk>

Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

# Appendices



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## **CARDIFF GROUP OF ADVANCED MOTORISTS**

### Application Form for Full Membership

This form can be completed and sent electronically to: [Membership@cardiffiam.co.uk](mailto:Membership@cardiffiam.co.uk). Step between the entries using the cursor, or the **Tab** and **Shift-Tab** keys. Check boxes can be ticked/ unticked by clicking or by pressing the space bar. Alternatively, it may be printed out, completed by hand and mailed to: Cardiff IAM Membership Co-ordinator, Llys Y Coed, St. Fagans, Cardiff, CF5 6DW.

The form will usually open in your browser, or Adobe Acrobat reader, a free version of which is available via <https://get.adobe.com/uk/reader/>.

<b>Surname:</b>	
<b>First Name(s):</b>	
<b>Title (Mr, Mrs, etc.):</b>	
<b>Home Address</b>	<b>Line 1:</b>
	<b>Line 2:</b>
	<b>Line 3:</b>
	<b>Line 4:</b>
<b>Postcode:</b>	
<b>Telephone number 1:</b>	
<b>Telephone number 2:</b>	
<b>E-mail address:</b>	
<b>IAM RoadSmart membership no:</b>	
<b>Date passed IAM test:</b>	
<b>Payment:</b> Standing Order is the preferred payment method. We can also accept payment by bank transfer or by cheque.	<input type="checkbox"/> <b>Standing Order</b> <input type="checkbox"/> <b>Bank Transfer</b> Please select one <input type="checkbox"/> <b>Cheque</b> (Payable to <b>Cardiff Group of Advanced Motorists</b> )
<b>Bank Details</b>	<b>Bank:</b> Lloyds <b>Sort Code:</b> 30-80-96 <b>Account Number:</b> 38494968 <b>Account Name:</b> Cardiff Group of Advanced Motorists
<b>Confirmation:</b> I wish to become a Full Member of the Cardiff Group of Advanced Motorists.	<input type="checkbox"/> <b>Yes</b>
<b>Signed:</b> (A signature is not necessary if the completed form is sent from your above email address)	
<b>Date:</b>	

Note: All information gathered will be stored and used strictly in accordance with Cardiff IAM Group Data Protection Policy, a copy of which is available on request.

[Your full address]  
[Your phone number]  
[Your email address]  
[The date]

[Name and address of the organisation]  
[Reference number (if provided within the initial response)]

Dear [Sir or Madam / name of the person you wish to contact]

### **Data Protection Complaint**

[Your full name and address and any other details such as account number to help identify you]

I am concerned that you have not handled my personal information properly.

*[Give details of your complaint, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]*

I understand that before reporting my complaint to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my complaint to the ICO, I will give them a copy of it to consider.

*[You can find guidance on your obligations under information rights legislation on the ICO's website ([www.ico.org.uk](http://www.ico.org.uk)) as well as information on their regulatory powers and the action they can take.]*

Please send a full response within 30 days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours faithfully,/sincerely, if addressed to a named individual  
[Signature]

[Your full address]  
[Your phone number]  
[Your email address]  
[The date]

[Name and address of the organisation]  
[Reference number (if provided within the initial response)]

Dear [name of the person with whom you have been in contact]

### **Information rights complaint.**

[Your full name and address and any other details to help identify you, for example an account number.]

I am writing further to your recent letter/email about my information rights complaint because I would like more clarification.

*[Organisations have an obligation to clearly explain why they are using data in the way they do or why they have refused a request. This is set out under the accountability principle of the DPA 2018.]*

*Accountability is one of the key principles in data protection law – it makes organisations responsible for complying with the legislation and says that they must be able to demonstrate their compliance.]*

I would like further clarification about

[Give details of what you don't understand. You should refer specifically to the response you have already received where appropriate]

I understand that before reporting my complaint to the Information Commissioner I should give you the chance to provide a full explanation.

If, when I receive your response, I would still like to report my complaint, I will give them a copy of your response to consider.

*[You can find guidance on your obligations under information rights legislation on the ICO's website ([www.ico.org.uk](http://www.ico.org.uk)) as well as information on their regulatory powers and the action they can take.]*

Please send a full response within one calendar month. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours sincerely,  
[Signature]