

# YAM Data Collection, Processing, Retention and Destruction Policy

## 1. INTRODUCTION

This policy document provides a description and statement of GDPR data processing and a framework of retention and disposal of categories of information and documents, thereby ensuring that York Advanced Motorcyclists (YAM - affiliated group to the IAM RoadSmart) meets its obligations in relation to data management. The implementation of these guidelines demonstrates the commitment to the principles of data protection, including the principle that information is only to be retained for as long as necessary for the purpose concerned.

Member's data will be held under the principles of data protection; they are:

- (i) Accurate
- (ii) Securely held
- (iii) Used in Accordance with GDPR guidelines
- (iv) Retained
- (v) Destroyed

## 2. ICO REGISTRATION

YAM is (and will remain) registered as a Tier 1 category with the Information Commissioner's Office (ICO). The YAM Data protection Officer name is registered along with the YAM registration.

## 3. DATA ACQUISITION

Upon registration with the IAM, the YAM member record is held on the DTE (The IAM Roadsmart Database system). The DTE allows for periodic extraction and download of members data by the groups and for members belonging to this group only. This data is used solely for communication purposes.

**3.1 Personal data download** – list of fields, all of them from the IAM application form

YAM Member ID, Surname, Forename, Title, Category (Full or Associate), Age, email address, Home telephone no, mobile telephone no, Address, Post Code, YAM reference no.

This format is defined and controlled by the IAM RoadSmart DTE system (the parent organisation); YAM have no control over this format.

#### **4. DATA STORAGE**

- (i) No data is stored on paper.
- (ii) No data is stored on PC/laptop hard drives, mobile phones or portable tablet devices.

The data is securely stored and protected in the form of Google Sheets in the industry-standard platform of the Google G Suite/ Secure Cloud Infrastructure. Access is controlled by the Data Manager's administrative privileges and restricted via authenticated user id and strong password to the Data Manager, the Membership Secretary, the Group Secretary and the Data Protection Officer, all of which have a necessary and legitimate purpose for access.

#### **5. DATA SHARING**

The personal data will be shared with the IAM only (the parent organisation and the original source). YAM will NOT disclose or share any of this data with any third party, company or individual. The only exception will be in the case of a legitimate disclosure under a Freedom of Information (FOI) request.

Data will be shared across the club's officers for training purposes.

#### **6. DATA PROCESSING**

A weekly run sheet is created as a paper form containing the relevant details of that particular run:

Date, destination, Observer Name (but not the personal details), role, Associate Name (but not the personal details)

Once recorded onto the electronic system, the run sheet is destroyed.

#### **7. PAPER RECORD DESTRUCTION**

As no data is held on paper, there is no need to destruct.

#### **8. RETENTION / DELETION**

The key principle behind Data Retention is that Information is only to be retained for as long as necessary for the purpose concerned.

- (i) Personal data

By the very nature of the perpetual/real time data download from the IAM DTE system the YAM secure storage holds only current YAM (IAM group no 4229) members' personal data at any given time. The extraction is activated periodically by

YAM's membership secretary and replaces the previous version, thus ensuring that only current data is extracted. As members are transferred to other groups or leave the IAM for whatever reason the latest extraction contains only current YAM members and previous members' personal data is deleted at source ; there is therefore no need or means for deletion at a local level.

(ii) Historical runsheet data

As stated in the GDPR principles historical data retention is permitted for performance management or statistical purposes so that their use is deemed necessary.

The runsheet information (containing names but NOT personal data - meaning that the data is desensitised and no reference can be made to the member's personal details) forms an integral part of YAM's operation, essential in order to perform its function.

Examples of reasons for keeping historical runsheet information (the list is not exhaustive):

- (i) Number of runs per observer per year (so that they maintain their observer status)
- (ii) Observer who undertook the progress check for a particular associate failing test.
- (iii) Number of runs on average for associate to take test (may span over two calendar years)
- (iv) Observer names (usually more than one) who trained a particular associate
- (v) The ratio of normal observing runs to development training

The training records of non-active observers will be deleted in line with GDPR / IAM requirements.