



The Mercedes-Benz Club

Privacy Notice

This document sets out the current policy of The Mercedes-Benz Club Limited (**we** or **the Club**) in relation to the personal data we collect. We keep our policy under review and may update it, in which case we will publish the updated version on our website. We will also inform Members and Officials of any updates relevant to them.

This document contains the following parts:

- Part A – About Us
- Part B – Members
- Part C – Club Officials (Volunteers)
- Part D – Club Officials (Employees)
- Part E – Third Party Officials and Other Third Parties
- Part F – Storage of Personal Information
- Part G – Your Rights.

If you are a Member who is also an Official you therefore need to read Part B in conjunction with Part C, D or E as relevant to you.

Part A - About Us

The Club is the official Mercedes-Benz club for the UK and the Republic of Ireland (**Ireland**). We are a company limited by guarantee, owned by our Members, and registered in England with company number 00615792. We also have a branch registered in Ireland with number no. 910075. Our purpose is to foster admiration and enthusiasm for the Mercedes-Benz marque (including its precursors and derivatives), to represent the marque in contemporary motoring circles, and to provide a range of club benefits and services for our Members. Currently all our Members have to be over 18 years old.

We are run by a Board of unpaid Directors normally elected by ballot from amongst our Members and around 130 other Officials. Most of these Officials are Members who similarly volunteer their services to the Club. These include Regional Officers who organise local events, Model Register Captains who have knowledge of particular models and may also organise events, a team who provide specialist technical advice, a team of valuers and many others on whom the Club depends to function. We also have a very small number of Officials who work for us on an employed or independent contractor basis.

We enter into contracts with third parties for the provision of various goods and services and may also obtain or be given information about other third parties in the course of our activities.

Our full contact details are:

| | |
|-------------------------------|---|
| Name: | The Mercedes-Benz Club Limited |
| UK registered office address: | 30 Scotgate, Stamford, Lincs, PE9 2YQ, UK |
| Irish branch address | 23 Parnell Place, Cork, T12 T853, Ireland |
| Phone number: | +44 (0)1780 482111 |
| E-mail: | office@mercedes-benz-club.co.uk |
| Website | https://mercedes-benz-club.co.uk/ |

Part B – Members

This Part B applies to you if you are a Member. If you are an Official, this Part B should be read in conjunction with Part C, D or E as applicable to you.

1. The types of personal information we collect

We collect and process personal information relating to your membership of the Club, including as follows:

- your full name, title, postal address, email address and telephone number
- financial information such as credit card information and bank account details
- details of your car(s) if you provide these
- your marketing preferences
- information needed to give you access to our websites, including the Club's Forum where you can post and reply to topics of interest to you
- records of any visits to our websites
- which events you sign up for
- any valuations of your car(s) under our Classic Car Insurance Scheme
- photographs and videos of you and/or your car(s) taken at Club events or otherwise provided by you
- information contained in letters or articles provided by you for publication and/or in postings on our Forum or social media sites
- information contained in correspondence relating to you, and
- whether you have agreed to the provision of official information to you via the Club's website.

2. How we get your personal information and why we have it

Most of the personal information we collect about you is provided to us directly by you (or if you are a joint Member, provided by your other joint Member with your permission) for one of the following reasons:

- to join the Club

- to pay subscription fees on renewal of your membership
- to receive membership benefits associated with being a Member
- to indicate your marketing preferences
- to participate in events organised by us or on our behalf
- to access our websites
- for the purposes of publication in the *Gazette* or on the Forum, and
- because you have a query that you want to raise with us.

Additionally, some information relating to you will be generated by us. For example, we will allocate a membership number to you when you join, will hold a record of your membership renewal date and will also keep a record if any communication we send you (such as the *Gazette* or an email) is returned undelivered. We may generate personal information in the form of a record of events you tell us you would like to attend or have attended, photographs or videos if you attend events that we organise, valuations of your car(s) that you ask us to carry out or in the course of correspondence that relates to you. If you visit any of the Club's websites, this will create a log of your visit.

Other Members may also provide personal information relating to you from time to time, for example, in postings on our Forum or in reports of events you have attended.

We use the information we collect and generate in order to manage your membership, including to:

- admit you as a Member of the Club and provide evidence of your membership
- process payment of your joining and subscription fees
- provide you with membership benefits, such as copies of the *Gazette* and its associated publications and Mercedes-Benz *Classic* magazine
- give you information relating to your membership, such as via newsletters in accordance with your marketing preferences
- give you full access to the Club's websites, including the Club's Forum if you so choose
- make arrangements for you to participate in events of your choosing
- make reference to you and/or your car(s) in the *Gazette*, including in regional reports or in articles or letters that you send for publication in the *Gazette*, and in postings on our social media platforms
- create marketing materials
- provide anonymised data to Mercedes-Benz in Germany about the models of cars held by our Members
- contact you about queries we may receive or answer any queries you may have
- carry out surveys of Members, and
- contact you if you do not renew your membership and record your reasons for not renewing.

We may also use certain information you provide or that we generate to create marketing materials.

3. How we share your personal information

We share information relating to you with third parties who are involved in delivering membership benefits or who support the administration and promotion of the Club. Third parties may include:

- the mailing house that dispatches the *Gazette* and any associated publications to you, Mercedes-Benz in Germany who are responsible for dispatching their *Classic* magazine and the issue of digital membership cards to members of Mercedes-Benz car clubs, who will be given your name and address and membership number as applicable
- suppliers of services in connection with events in which you have chosen to participate, who will be given your name and any other relevant information required
- financial intermediaries through whom payments of membership fees and for events are collected
- social media sites, such as Facebook and Instagram
- the contractors who support and develop our websites, and
- the Club's accountants and other professional advisers.

Recipients of the *Gazette*, including third parties who receive complimentary copies as well as other Members, and those who access the Club's Forum or social media sites will have access to any personal information about you that is published via those mediums. We take steps to ensure the Forum and our social media sites are appropriately moderated.

Our statutory Register of Members, which contains your name and address, the date on which you were registered as a Member and, if applicable, the date on which you ceased to be a Member, is open to inspection as a matter of law.

4. Overseas transfers of your personal information

If you are a Member located in Ireland and you wish to receive information about local events or other membership benefits in Ireland, we will pass details of your name and email address to the relevant Official(s) in Ireland. Information you provide to relevant Officials in Ireland in connection with your membership and/or membership benefits may also be transferred to the UK.

Some third parties, such as suppliers of services in connection with Club events outside the UK and Mercedes-Benz in Germany, are also located outside the UK.

5. Our bases for processing your personal information

Under the UK General Data Protection Regulation (**UK GDPR**) and, in relation to Members located in Ireland, the General Data Protection Regulation of the EU (**EU GDPR**), the lawful bases we rely on for processing your personal information are:

Contract. We hold and share certain information relating to you as set out above to administer your membership and provide you with the membership benefits we offer. We also rely on this basis to process payments of your membership fees and payments for Club events in which you wish to participate.

We have a legal obligation. In order for you to be a Member of the Club we must enter your full name and postal address and the dates on which you become and cease to be a Member in our statutory Register of Members.

Your consent. If you have provided us with your email address, your telephone number and/or information about your car(s) and/or given permission for your contact details to be shared with our Officials, you may withdraw your consent to our holding or sharing the relevant information at any time. You can do this by contacting us by email to office@mercedes-benz-club.co.uk or by letter to The Mercedes-Benz Club Limited, 30 Scotgate, Stamford, Lincs, PE9 2YQ, UK or, if you are a Member located in the Republic of Ireland, to The Mercedes-Benz Club Limited at 23 Parnell Place, Cork, T12 T853, Ireland.

If you withdraw your consent for us to use your email address and/or telephone number, however, this will reduce our ability to contact you and as a result may affect the level of membership benefits you are able to receive. If you are an Overseas Member (ie a Member whose registered address is not in the UK or Ireland) and withdraw your consent to our using your email address, this will affect your legal rights under the Club's Articles of Association.

We have a legitimate interest. We publish articles in the *Gazette*, newsletters, marketing materials for the Club, our websites and on social media platforms which may include information about the events you are attending and photographs and/or videos of you and/or your car(s). We may also identify you in these materials. If you do not renew your membership, we may use your contact details to find out from you whether this is intentional and, if it is, your reasons for not renewing.

Part C – Officials (Volunteers)

This Part C applies to you if you are, or apply to become, an Official who volunteers for the Club, including our Directors.

1. The types of personal information we collect

As an Official who volunteers for us, we collect and process personal information about you in connection with your role in addition to the personal information set out in Part B. This information includes:

- your role(s)
- information relating to your application for those role(s)
- results of ballots for the appointment of our Directors
- your telephone number if not provided as a Member
- records of your expense claims
- your bank account details
- details of any relevant personal electrical equipment as detailed below, and
- your training records.

As an Official we will also hold information relating to you that is part of our management information, for example, information in board minutes if you become a Director.

2. How we get your personal information and why we have it

All the information we receive is directly provided by you with the exception of your role(s), your training records and the results of ballots, which we generate.

We use the information you provide us about your expense claims and the bank account details you give us so that we can reimburse your expenses in line with the Club's expenses policy.

We generate records of training you have received from the Club in the interests of ensuring all our Officials are aware, to the extent relevant to them, of the Club's procedures for organising events and our health & safety, confidentiality and data security procedures. As part of our health & safety procedures we keep a record of any significant personal electrical equipment that you wish to use for Club events you organise so we can ensure it is PAT tested in accordance with best practice.

3. How we share your personal information

We may publish your name and telephone number in the *Gazette* and its associated publications, on our website and provide it to our Members in line with their marketing preferences.

Information about expense claims is shared with our accountants.

Information relating to the results of ballots for Director appointments may be shared with two independent Members unconnected with the ballot process as selected by the Directors or with a suitably qualified independent person and statutory particulars of those who are appointed as Directors or as Company Secretary is published at Companies House.

4. Our bases for processing your personal information

Under the UK GDPR and, in relation to relevant Officials located in Ireland, the EU GDPR, the lawful bases we rely on for processing your personal information are:

We have a legal obligation. In order for you to be a Director or Company Secretary of the Club we must enter your full name and address and certain other particulars at Companies House.

Contract. We hold and share certain information relating to you as set out above to reimburse your expenses.

We have a legitimate interest. We have a legitimate interest in keeping records relating to the appointment of our Officials and their ongoing training and the use of safe equipment used at our events.

Part D – Officials (Employees)

This Part D applies to you if you are, or apply to become, one of our Officials who works for the Club on an employed basis.

1. The types of personal information we collect

If you are one of our employees, we collect and process the following personal information relating to you in addition to any personal information we collect and process if you are a Member as set out in Part B:

- your full name, title and postal address
- your personal email address, telephone number and emergency contact details if you provide all or any of these
- financial information such as your bank account details, NIC number, tax code and pension arrangements
- your contract of employment and any changes to it
- employment references
- ongoing employment records relating to your employment
- expense claims, and
- information contained in correspondence relating to you.

2. How we get your personal information and why we have it

At around the time of starting your employment, you will have provided us with personal information that we need for the purposes of performing our obligations under your contract of employment and under applicable law. You may also (with the prior permission of the relevant individual(s)) have provided us with employment references and, if we require this, your emergency contact details.

During the course of your employment, you or government bodies such as HM Revenue & Customs (**HMRC**) may give us other personal information relating to you. We ourselves will also generate employment records containing personal information relating to you, such as changes to your employment contract, records of payments of remuneration and pension contributions, particulars of holiday and sickness absences and other employment-related matters arising.

We use this information:

- to pay your remuneration and give you advice of its payment
- to process pension contributions made by you and by the Club
- to administer your employment contract in accordance with its terms
- to communicate with you via your personal email, home telephone or personal mobile based on the information you have provided to us should the need arise, and
- to communicate with your emergency contact should the need arise.

3. How we share your personal information

We may share employment-related information that you give us with certain third parties. These include:

- government bodies, such as HMRC and The Pensions Regulator, in connection with the collection of taxes and national insurance contributions and pension enrolment
- third parties who administer our payroll or the reimbursement of any employment expenses
- our appointed pension supplier in connection with pension contributions made on behalf of the Club and yourself
- your emergency contact should the need arise, and
- at the outset of your employment, referees who give us employment references for you.

4. Our bases for processing your personal information

Contract. We rely on this basis to perform our obligations under your contract of employment.

We have a legal obligation. We are required to share certain information relating to your employment with government bodies and other third parties in connection with the collection of taxes and national insurance contributions and your pension arrangements.

We have a legitimate interest. We have a legitimate interest in holding your personal contact details and those of your emergency contact so that we can alert you or them in the event of something urgent affecting your work, such as an emergency at your place of work, or a personal emergency.

Part E – Third Party Officials and other Third Parties

This Part E applies to you if you are, or apply to become, an Official who works for the Club on an independent contractor basis or you are another type of third party.

1. The types of personal information we collect

If you are an individual who provides, or may provide, goods and/or services to us or to our Members, we currently collect and process the following personal information relating to you:

- your personal contact details, including your name, email address and telephone number
- information about the goods and/or services you provide, and
- your bank account details.

We also collect and process personal contact details of staff at third party organisations who provide, or may provide, goods and/or services to us or to our Members.

2. How we get the personal information and why we have it

We normally get this personal information from the relevant individual or third party organisation concerned. Some information about third parties, however, for example in relation to our *Good Garage Guide*, may be provided to us by Members or through referrals by other third parties or third party organisations.

We use this information:

- to facilitate contact with third parties or staff at third party organisations so that they can provide us or our Members with goods and/or services, and
- to pay for goods and/or services that we receive.

3. How we share your personal information

Information about payments to third parties is shared with our accountants.

We may publish contact details for third parties in the *Gazette* and its associated publications or on our website.

4. Our bases for processing your personal information

The lawful bases we rely on under the UK GDPR and, in relation to any processing in the Republic of Ireland, the EU GDPR for processing your personal information are:

Contract. We hold and share information to enable us to perform our contractual obligations.

We have a legitimate interest. We may publish information in the *Gazette* and associated publications and on our website relating to third parties who provide, or may provide, goods and/or services to us and/or our Members as part of our provision of membership benefits.

Part F – Storage of Personal Information

1. Information security

The Club never sells personal information to third parties and takes the security of your personal information extremely seriously.

Most personal information is stored in a secure cloud based computer database to which only Officials employed in the Club's office normally have access using laptops provided by the Club. This data is protected from viruses and external access and is backed up each day. This includes any information that the Club holds relating to bank account details to enable Direct Debit transactions or the reimbursement of expenses. The Club does not store any credit card information that is provided by Members for the purposes of collecting subscription and membership fees or other payments.

Officials who volunteer for the Club have access to personal information held by the Club only as strictly necessary for the purposes of their role(s). The information given to these Officials is provided only after the Official has first signed the Club's confidentiality agreement, which amongst other things sets out how Members' personal information may be used and prescribes the Club's information security requirements for Officials' personal computers.

Key requirements are:

- personal computers must be password-protected and have appropriate anti-virus protection
- Officials are provided with a Club email address and required to use this at all times in the course of their work for the Club
- Officials must delete or destroy all personal information provided to them in the course of carrying out their role(s) when they leave office
- no Official is allowed to share personal information with any third party unless authorised to do so by the Club or the person concerned
- any loss of a personal computer on which personal information is stored and any theft of personal information must be reported to the Club immediately.

In accordance with the requirements of the UK GDPR we also enter into appropriate agreements with third parties who process personal information relating to Members and/or Officials on our behalf.

2. Information retention

Personal information in our Gazette is held indefinitely as this information forms part of the historical records of the Club. Personal information held in the Club Directory is updated on an ongoing basis. Personal information posted on the Forum is held indefinitely in some instances but may also be deleted if we consider it no longer relevant.

Personal information posted by us on social media sites is held in accordance with the retention policy of the site, which may mean it is held indefinitely until the account is closed. Personal information shared with other third parties who are not processing it on our behalf is held in accordance with the retention policy of those third parties.

We encourage Officials to delete or destroy personal information they no longer need for the purposes of carrying out their role(s). All emails sent or received by Officials from/to their Club email address are normally deleted within 3 months of their ceasing to hold office.

Otherwise, personal information is normally held by us (or those processing information on our behalf) for the periods set out in the table below unless the Club needs to retain it for other reasons.

3.

| Part of Privacy Notice | Type of information | Retention period |
|-------------------------------|--|--|
| Part B – Members | Information in register of Members | Up to 11 years after you cease to be a Member |
| | Minutes of AGMs or other general meetings of the Members and board minutes | Up to 11 years after the date of the meeting in accordance with statutory requirements |

| | | |
|---------------------------------|---|---|
| | Information about the events you attend | Up to 6 years after the event |
| | Classic Car Scheme valuations | Indefinitely so as to assist with further valuations |
| | Other information | Up to 12 months after you cease to be a Member |
| Part C – Officials (Volunteers) | Payments made for expenses etc | Up to 7 years after you cease to be an Official in compliance with statutory requirements for financial records |
| | Training records | Up to 7 years after ceasing to be an Official |
| | Signed confidentiality agreement | Indefinitely – Officials’ confidentiality obligations do not cease |
| | Other information | Up to 12 months after you cease to be an Official |
| Part D – Officials (Employees) | Employment, pension and training records | Up to 7 years after the end of employment |
| | Recruitment application forms and interview notes for unsuccessful candidates | Up to 12 months after the post is filled |
| Part E - Third Parties | Contracts for goods and services | Up to 7 years after the end of the contract |

Personal information is deleted at the end of its retention period or securely destroyed in the case of physical records.

Part G – Your Rights

1. 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 correct your personal information if you think it is inaccurate, including to complete information if you think it is incomplete.

Your right to erasure - You have the right to ask us to delete your personal information in certain circumstances.

Your right to restrict 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 the right to object to the processing of your personal information in certain circumstances.

These rights may be subject to limitations and exemptions in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request to exercise your rights, we have one month to respond to you.

Please contact us by email to admin.processing@mercedes-benz-club.co.uk or by letter sent to The Mercedes-Benz Club Limited at 30 Scotgate, Stamford, Lincs, PE9 2YQ, UK if you wish to make a request, quoting your membership number if you are a Member. Members located in the Republic of Ireland may alternatively contact us by letter sent to The Mercedes-Benz Club Limited at 23 Parnell Place, Cork, T12 T853, Ireland.

2. How to complain

If you have any concerns or complaint about our use of your personal information, you can let us know your concern or make a complaint to us by email to admin.processing@mercedes-benz-club.co.uk or by letter to The Mercedes-Benz Club Limited at 30 Scotgate, Stamford, Lincs, PE9 2YQ, UK. Members located in the Republic of Ireland may alternatively contact us by letter sent to The Mercedes-Benz Club Limited at 23 Parnell Place, Cork, T12 T853, Ireland.

If you are unhappy with how we have used your personal information, you can also complain to the Information Commissioner's Office (**ICO**) or, if your complaint relates to the collection and/or processing of your personal information in connection with services provided to you in Ireland, to the Data Protection Commission (**DPC**).

Contact details for the ICO and DPC are:

| ICO | DPC |
|---|--|
| Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF | Data Protection Commission 21 Fitzwilliam Square South Dublin 2 D02 RD28 Ireland |
| Helpline number: 0303 123 1113 | Helpline numbers: 01 7650100 / 1800437 737 |
| ICO website: https://www.ico.org.uk | DPC website: https://www.dataprotection.ie/ |

8 April 2024