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The Camping and Caravanning Club

DATA PROTECTION POLICY

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PERSONAL DATA PROTECTION POLICY

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1 Who Are We

- 1.1. The Camping and Caravanning Club (The Club) is a Not For Profit Organisation, Limited by Guarantee, registered in England and Wales under company number: 445520. Our registered company address is The Camping and Caravanning Club, Greenfields House, Westwood Way, Coventry, CV4 8JH.
- 1.2. At The Club we collect different types of Personal Data about current, past and prospective members and non-members, who contact us, visit our websites or use our applications for three main reasons:
 - 1.2.1. To provide personalised services unique to the individual;
 - 1.2.2. To help us to monitor and improve the services we offer;
 - 1.2.3. If we have permission from the individual, to market services.
- 1.3. The Club also processes Personal Data relating to current, past and prospective employees, to:
 - 1.3.1. Enter into employment contracts and to administer pay, benefits, pension and other entitlements;
 - 1.3.2. Comply with our legal obligations including, taxation, health and safety, other directives and leave entitlements;
 - 1.3.3. Deliver effective Human Resource (HR) and business administration activities.
- 1.4. The Club uses the following lawful reasons for the processing of Personal Data:
 - 1.4.1. In the formation and delivery of a Contract;
 - 1.4.2. To comply with Legal obligations;
 - 1.4.3. Where we have a Legitimate Interest.
- 1.5. For more information about the Personal Data we collect, manage, share and securely destroy, please review our Fair Processing Notice.
- 1.6. The Club trades under a number of brands:
 - 1.6.1. UK Clubsites;
 - 1.6.2. Readycamp;
 - 1.6.3. Worldwide Motorhoming Holidays;
 - 1.6.4. Club Holiday Homes;
 - 1.6.5. Travel Services.
- 1.7. In addition, The Club partners with the Forestry Commission under the trading name of Camping in the Forest.

2 Commitment to Privacy

- 2.1. The Directors, Staff and Office Holders of The Club are committed to defending the rights and freedoms of individuals by complying with Data Protection Legislation and best practice.

- 2.2. The Club shall establish, implement, maintain and continually improve a Personal Information Management System (PIMS).
- 2.3. The Directors and Senior Managers (Top Management) of The Club shall demonstrate leadership and commitment with respect to Privacy, by:
 - 2.3.1. Ensuring that the Data Protection Policy and Objectives are established and are compatible with the strategic direction of The Club.
 - 2.3.2. Ensuring that the resources needed for the PIMS are available.
 - 2.3.3. Communicating the importance of effective Personal Data management and of conforming to the requirements of the PIMS.
- 2.4. All Staff and Office Holders who come into contact with Personal Data shall:
 - 2.4.1. Be trained in Data Protections, ensuring they understand their role and the importance of strong information security and privacy practices.
 - 2.4.2. Ensure they maintain the confidentiality, integrity and availability of Personal Data.
 - 2.4.3. Top Management shall establish, publish and maintain a Data Protection Policy (The Policy). The Policy shall be documented, communicated within the organisation and made available to interested parties.
 - 2.4.4. The Policy shall cover all processing of Personal Data within The Club.

3 Data Protection Objectives

- 3.1. The Club shall protect the confidentiality, integrity and availability of Personal Data processed on behalf of our members, non-members and employees.
- 3.2. To comply with all relevant Data Protection Legislation and best practice to protect The Club's trusted reputation.
- 3.3. The Club shall protect payment cardholders from the risk of data loss by maintaining compliance with the Payment Card Industry Data Security Standard (PCI DSS).

4 Data Protection Principles

- 4.1. The Club shall establish and continually improve all necessary technical and organisational measures, ensuring:
 - 4.1.1. The processing of Personal Data is fair, lawful and transparent.
 - 4.1.2. We provide clear information to individuals about how their Personal Data will be used and by whom.
 - 4.1.3. Personal Data will only be processed where it is strictly necessary for legal or legitimate organisational purposes.
 - 4.1.4. The minimum, relevant and adequate Personal Data is processed, being retained for only as long as is necessary.
 - 4.1.5. To keep Personal Data accurate and where necessary, up-to-date.
- 4.2. The Club shall only transfer Personal Data outside the European Economic Area (EEA) in circumstances where it can be adequately protected.

5 Respect Individuals Rights

- 5.1. The Club respects and actively supports the rights of individuals (also known as Data Subjects) to:
 - 5.1.1. Make informed decisions about the processing of their Personal Data.
 - 5.1.2. Be informed of the means and purpose of processing, ensuring fairness and transparency.
 - 5.1.3. To obtain confirmation and access to Personal Data processed by The Club (Subject Access Requests)
 - 5.1.4. To request rectification, erasure or a portable copy of Personal Data.
 - 5.1.5. To object to, or request restrictions in, processing or automated decision making.

6 Cardholder Data

- 6.1. Additional technical and organisational controls will be implemented by The Club to protect the security of payment cardholder data.
- 6.2. In accordance with the obligations of PCI DSS, The Club shall establish, implement and maintain appropriate information security policies and procedures, including security awareness training, risk assessments and incident response plans.
- 6.3. The Club shall ensure that appropriate policies, procedures and agreements are in place with service providers with whom cardholder data is shared, including:
 - 6.3.1. Due diligence of prospective service providers prior to engagement.
 - 6.3.2. Regularly monitoring the PCI DSS compliance status of service providers.

7 Data Protection Legislation

- 7.1. In the United Kingdom, "Data Protection Legislation" means all applicable data protection and privacy legislation or regulations including The Privacy and Electronic Communications (EC Directive) Regulations 2003 (also known as PECR) and any guidance or codes of practice issued by the Information Commissioner Office, together with:
 - 7.1.1. From 1 January 2021 onwards, the "United Kingdom General Data Protection Regulation" (UK GDPR), as amended by the UK Data Protection Act 2018.
 - 7.1.2. Within the European Economic Area (EEA), Regulation (EU) 2016/679 the "General Data Protection Regulation" (GDPR).
- 7.2. Outside of the EEA, "Data Protection Legislation" means local, territorial data protection and privacy legislation that governs the processing of Personal Data.

8 Data Protection Office

- 8.1. The Club shall ensure that it has appointed someone with the necessary skills and the specific responsibility for Data Protection within the organisation.
- 8.2. Individuals have the right to obtain information from The Club if their Personal Data is processed. This right is exercised by the submission of a Subject Access Request (SAR). The Data Protection Office will coordinate the response to SAR's accurately and within the period specified by Data Protection Laws.

- 8.3. The Data Protection Office will coordinate the response to individuals exercising their rights by requesting their Personal Data:
- 8.3.1. Be rectified if incorrect.
 - 8.3.2. Erased if no longer required, appropriate or lawful.
 - 8.3.3. Has processing restrictions applied or objections made.
 - 8.3.4. Be provided in a portable format.
- 8.4. If an individual is unhappy with how their Personal Data is processed by The Club, they have the right to complain to the Data Protection Office. The Data Protection Office shall investigate any complaints fairly and notify the individual of their findings promptly.
- 8.5. Requests, queries, objections and complaints about how The Club handles personal data will be dealt with promptly and courteously.
- 8.6. The Data Protection Office can be contacted by post to The Data Protection Office, The Camping and Caravanning Club, Greenfields House, Westwood Way, Coventry, CV4 8JH; by email at data.protection@campingandcaravanningclub.co.uk or telephone on +44 (0)24 7647 5448.

9 Supervisory Authority

- 9.1. The Club is registered with the Information Commissioner's Office (ICO) as a Data Controller for the processing of Personal Data (Registration No. Z658287X).
- 9.2. If an individual is unhappy with how The Club has responded to a request or dealt with an issue, they have the right to lodge a complaint with the ICO. The Club shall cooperate and assist the ICO in their investigations.
- 9.3. The ICO is the independent supervisory authority set up to promote and oversee compliance with data protection legislation in the UK. Their address is Information Commissioner's Office, Wycliffe House, Water Lane, Cheshire, SK9 5AF. You can also contact them by telephone on 01625 545 745 or via their website at www.ico.org.uk.

APPROVED on behalf of The Camping and Caravanning Club

Signature:



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