

# Privacy Statement for Members' Personal Data

*MORAY CARSHARE, OCTOBER 2018*

## INTRODUCTION

Moray Carshare holds personal data about our members in order to manage our operations and meet our legal requirements. This statement sets out what data we hold, how we store it, and in what circumstances we will disclose this data to third parties.

If you have any queries about the data we hold on members and how we use it, please contact the Moray Carshare Manager (08458 609 609 or [manager@moraycarshare.com](mailto:manager@moraycarshare.com)).

## PERSONAL DATA HELD ON MEMBERS

When members join Moray Carshare, we ask for contact details including home address, telephone numbers and email address. We also ask for date of birth, driving licence number and information on driving offences and insurance claims/refusals in order to comply with the conditions of our insurance policy.

Our booking system holds the member's full name, email address and mobile phone number. For each trip we record member, vehicle, duration and destination (if the member opts to provide it).

Our billing system holds the member's full name, address, trips and charges billed to the member, fuel payments by the member, amounts and dates of payments received from the member and balances due.

## STORING MEMBERS' PERSONAL DATA

Hard copies of application forms are kept in lockable storage, only accessible by Moray Carshare staff.

Electronic copies of application forms and licence checks/copies, electronic members list, and our billing system are stored on cloud-based shared drives. These are password protected. We use Google Drives, who have confirmed that their security is compliant with European data protection regulations. Google's privacy policy can be read in full at: <https://policies.google.com/privacy>

Our members' list, containing member name, telephone number, email and area is available in hard copy in all Moray Carshare cars and in 2 "key sheds" which are accessible to the general public. The members' list is also available to download for all members from a password protected area of the Moray Carshare website.

Members may request their name to be fully or partially removed (e.g. by showing first name only) from these lists.

Member bookings are stored on an online booking system accessed by a member log in name and unique password. Member name, destination, phone number, booking time and duration are viewable to other members. Member emails and mobile phone numbers can only be accessed using administrator/supervisor passwords. The booking system is provided by SuperSaaS, who are committed to GDPR compliance. Their privacy statement can be read in full at:

<https://www.supersaas.com/info/privacy>.

## **PASSING ON MEMBERS' PERSONAL DATA**

Our members' list is available in Moray Carshare vehicles and in our key sheds. We ask that our members do not pass this information on to non-members, but we cannot guarantee the confidentiality of this data.

Other than the above, we will not pass on members' personal data to third parties except:

- To UK statutory authorities such as the police and/or emergency services in the event of an accident, incident or investigation of a driving offence
- To our insurers or the insurers of third party where this data is required for an insurance claim
- Where we have a legal obligation to disclose the data, such as compliance with a court order
- If Moray Carshare receives a notice of a parking charge or fine, we will pass on the notice to the member who has booked the car at the time of the alleged infringement to either pay or contest. If the member does not agree to take responsibility, then Moray Carshare has the right to pass on the member's name and address to the relevant company or public authority.

We sometimes pass on statistical data to a third party for research purposes. In such cases all personal information is removed (e.g. via "anonymisation").

## **OUR RESPONSIBILITIES AND MEMBER RESPONSIBILITIES**

Moray Carshare will:

- Comply with the above privacy statement and ensure members understand and consent to our use of members' personal data
- Regularly review the security of our IT systems to ensure personal data is not put at risk
- Correct errors in the data we hold promptly, and comply promptly with requests from members to disclose or delete information we hold about them
- Hold data no longer than is necessary to meet administrative and legal obligations

We ask members to:

- Not pass on members' details of fellow members without obtaining their express permission

- Let us know if their personal details change, in particular their phone numbers as well as email and postal addresses
- Inform us of any driving offences or claims relating to motor insurance which have arisen when driving vehicles other than Moray Carshare cars