

# Privacy Policy - 116 TROPHY LTD

## Introduction

The 116 Trophy Ltd (collectively referred to as "The 116 Trophy, "we", "us" or "our" in this privacy notice) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tells you about your privacy rights and how the law protects you.

The 116 Trophy Ltd is the controller and responsible for your personal data

We have appointed a data protection manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DATA PROTECTION MANAGER using the details set out below.

## Contact details

Full name of legal entity: The 116 Trophy Ltd.

Data Protection Manager: Mark Bate

Email address: info:116trophy.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## Changes to the privacy notice and your duty to inform us of changes

This document was last updated on 219/01/2022. Historic versions of the document may be obtained by contacting us. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** which include title, given name and family name, and the names of your next of kin.
- **Contact Data** which include home address, email address and telephone numbers for you and your emergency contacts.
- **Licence information** is collected for members that possess an MSUK racing licence. This includes the grade and number of the licence.
- **Financial Data** which include bank account details.
- **Transaction Data** which include details about payments to and from you and other details of products and services you have purchased from us. We also collect information as to which club activities you have participated in (such as race meetings) and related data such as the results of those races and the information concerning championship positions that derives from those data.
- **Profile Data** which includes your preferences about how we contact you and your interests in our activities.

- **Photographs and Videos**, such as photographs of you and/or your vehicle on-track when participating in 116 Trophy events. These may be taken without your specific consent at the time.
- **Racing activity data**, such as details about your vehicle, performance, results, penalties, and incidents you were involved in during our events.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we collect information as to how many members' primary interest lies in trials or circuit racing. If we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

## If you fail to provide personal data

Where we need to collect personal data by law, under the terms of a contract we have with you, or to provide membership benefits to you, and you fail to provide that data when requested, we may not be able to perform the contract or provide the membership benefits to you. For example, to accept your entry into one of our race meetings. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial Data and other data about your racing activities, by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - register for the race series;
  - enter a race meeting;
- **Interactions with you at our events.** You may speak to us or provide information to us when meeting us at our events.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.
- **Photographs and Videos** will be taken at 116 Trophy events.
- **From online entry systems** when you enter your details for events
- **From MSUK**
- **From officials and marshals at race meetings:** Officials and marshals at race meetings may provide us with reports relating to incidents and events in which you were involved during a race event. This may include reports of on-track or off-track incidents, such as accidents, and penalties given to you.
- **From other members**
- **From a racing member.** Your name and contact details might have been provided to us as next of kin/emergency contact data for their racing activities.

## How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To establish you as a member of the series.	Performance of a contract with you
<p>To process your registration for your entry for a race meeting, including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collecting and recover money owed to us</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us; to provide benefits to our members)</p>
<p>To provide you with goods or services purchased from our online shop, including:</p> <p>(a) Managing payments, fees and charges</p> <p>(b) Delivering any item to you</p> <p>(c) Collecting and recovering money owed to us</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
To contact you at events, and to manage your participation at events (including in relation to decisions taken by Race Officials)	Necessary for our legitimate interests (to effectively administer our events)
To manage the efficient administration of the registration and our events, including making decisions about registration, who can participate in our events, and on the efficient and safe administration of our events.	Necessary for our legitimate interests (to effectively and safely administer our registration and events; to exercise our rights as a series in respect of our members)
To send you tickets and details for events	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to effectively administer our events)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
To deliver series specific information to you, such as newsletters and information about upcoming events.	(a) Necessary for our legitimate interests in running a motorsport series and our organised events, and expanding our activities.

	<p>(b) Performance of a contract with you</p> <p>(c) Consent (where you have provided consent to receive marketing information)</p>
To post or include information about you and/or your activities in the series on social media sites, our website, in race programmes, and in series bulletins and updates (for instance, details of your race results, or a photograph of you on a race-winner's podium)	Necessary for our legitimate interests in advertising the 116 Trophy's activities, and keeping our members updated.
To keep you updated with information from 116 Trophy events with which you are involved	<p>(a) Necessary for our legitimate interests in running a series and our organised events, and expanding our 116 Trophy's activities.</p> <p>(b) Consent (where you have provided consent to receive marketing information)</p>
To share your details with Centres and championship organisers or promoters for championships or series you have registered for.	<p>(a) Necessary for our legitimate interests in running a Motorsport series and our organised events, and expanding 116 Trophy's activities.</p> <p>(b) Consent, where you provide express consent to this.</p>
To provide the additional benefits that you receive by being registered for the series	<p>(a) Necessary for our legitimate interests to provide the benefits that are part of being registered for the 116 Trophy</p> <p>(b) Performance of a contract</p>
In the case where your details are given to us as next of kin: to retain for use in the event of an on-track incident.	Necessary for our legitimate interests in running race events.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### Promotional offers from us

We may use your Identity, Contact and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, events and offers may be relevant for you.

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any other company for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to messages about our services and activities, such as updates and information about the races you have entered, or to registration benefits such as our newsletter.

## Disclosures of your personal data

We may have to share your personal data with the external third parties listed below to carry out the purposes set out above:

- **Service providers** who provide administrative and IT services to us, including our online registration system;
- **Partners** and other third parties who provide benefits to our members;
- **Regulators and Governing Bodies** such as MSUK;
- **Our marshals and race officials.**
- **Our Professional Advisers** such as lawyers, accountants, insurers, auditors and bankers;
- **HMRC** and other authorities who we share data with when required by the law.

## Media Use

We may use your name and details of your racing activities, and photographs of you and/or your vehicle on our social media sites, website, race programmes and 116 Trophy newsletters and bulletins.

## International transfers

We may transfer your data outside of the UK to the European Economic Area (EEA). Where we do so, we rely upon the EEA being deemed to have adequate safeguards for the purposes of the Data Protection Act 2018 and UK GDPR.

## Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us.

## Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Specifically, you may:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it and in certain other circumstances.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in certain circumstances set out in law.
- **Request the transfer** of your personal data to you or to a third party.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us. In many cases, exercising of these rights will render the 116 Trophy unable to deliver its services to you. For example, without your contact information you may not be entered into any race meeting.