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Privacy Policy

4x4

Response

UK

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Hampshire & Berkshire 4x4 Response

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Privacy Policy

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UK Privacy Policy

This Privacy Policy for Individuals in the UK is an adaptation of the general Privacy Policy for compliance with the UK Data Protection and Privacy laws post Brexit.

This Privacy Policy statement is made by the Hampshire & Berkshire 4x4 Response Group consisting of all the entities listed here (collectively, "HB4x4R", "we", "us" or "our")..

Document Version History

Version Number	Description	Author	Date
1.0	Initial document	Axel Seedig	16/10/2022

HB4x4R's Privacy Commitment

The HB4x4R has always held its members and user data privacy in the utmost regard since inception, long before it became fashionable, politically correct, or legally binding to take such a position. We ask for only the least amount of information necessary, gathering only what we believe is essential for doing business, or for the specific transaction at hand. We let members know the information we have on them and allow them to opt out of specific engagements. But, by far, our biggest commitment is that we do not make a single pound from advertising revenue—never have, never will. This means we avoid the fundamental conflict of interest between gathering member information and fuelling advertising revenue, and the unavoidable compromises in the member's privacy that it brings.

The goal of this policy is to make explicit the information we gather, how we will use it, and how we will not. This policy is unfortunately longer than we would like, but we must unambiguously address all the relevant cases. We will try and keep the language simple and direct as much as possible.

Scope of this Privacy Policy

This Privacy Policy applies to all HB4x4R websites that link to it. It also applies to the products and services provided by HB4x4R through these websites, our mobile applications (if applicable), and applications. This Privacy Policy does not apply to any of our websites, products or services that have a separate privacy policy.

This Privacy Policy is divided into three parts:

Part I – Information HB4x4R collects and controls

This part deals with how HB4x4R collects and uses information about website visitors, potential customers, users of HB4x4R's products and services, and others who contact HB4x4R through forms or email addresses published on or linked to our websites.

Part II – Information that HB4x4R processes on your behalf

This part deals with how HB4x4R handles data that you entrust to HB4x4R when you use our products and services, or when you share any personal or confidential information with us while requesting customer support.

Part III – General

This part deals with topics that are relevant to both Parts I and II, and other general topics such as HB4x4R's security commitments and how we will inform you when we change this Privacy Policy.

Part I – Information HB4x4R collects and controls

What information HB4x4R collects

We collect information about you only if we need the information for some legitimate purpose. HB4x4R will have information about you only if (a) you have provided the information yourself, (b) HB4x4R has automatically collected the information, or (c) HB4x4R has obtained the information from a third party. Below we describe the various scenarios that fall under each of those three categories and the information collected in each one.

Information that you provide us

i. Account signup/filling out the online application form: When you sign up for an account to access one or more of our services or if you have filled out our online application form to become a member, we ask for information like your name, contact number, email address, company name and country etc. to complete the account signup process. You'll also be required to choose a unique username and a password for accessing the created account. The exception is the Responder Manager application, where your call sign is your username, which will be provided to you by us. For the H&B4x4R Website/Forum you may also provide us with more information such as your photo, time zone and language, but we don't require that information to sign up for an account. For the membership application additional information like your photo and your signature is required for the membership ID card. After signing up, you will have the option of choosing a security question and an answer to the security question — if you provide these, they will be used only while resetting your password.

ii. Event registrations and other form submissions: We record information that you submit when you (i) register for any event, including trainings or seminars, (ii) subscribe to our newsletter or any other mailing list, (iii) submit a form in order to download any product, whitepaper, or other materials, (iv) participate in events or respond to surveys, or (v) submit a form to request customer support, get a quote or to contact HB4x4R for any other purpose.

iii. Payment processing: When you buy something from us, the payment will be handled by PayPal. We do not store any credit card information or other payment account information.

iv. Testimonials: When you authorize us to post testimonials about our products and services on websites, we may include your name and other personal information in the testimonial. You will be given an opportunity to review and approve the testimonial before we post it. If you wish to update or delete your testimonial, you can contact us at controller@hampshire4x4Response.co.uk.

v. Interactions with HB4x4R: We may record, analyse, and use your interactions with us, including email, telephone, and chat conversations with our secretary and team controllers, for improving our interactions with you and other members.

Information that we collect automatically

i. Information from browsers, devices, and servers: When you visit our websites, we collect information that web browsers, mobile devices and servers make available, such as the internet protocol address, browser type, language preference, time zone, referring URL, date and time of access, operating system, mobile device manufacturer and mobile network information. We include these in our log files to understand more about visitors to our websites and also for security and fraud prevention.

ii. Information from cookies and tracking technologies: We use temporary and permanent cookies to identify users of our services and to enhance user experience. We mostly use first-party cookies and do not use third-party cookies or other third-party tracking technologies on our websites for non-essential or intrusive tracking. We also use first-party Local Storage Objects (LSOs) such as HTML5 to store content information and preferences to provide certain features.

Information that we collect from third parties

The only information we collect from a third party is the data from your DBS (Disclosure and Barring Service) check. You can learn about what information we request here:

<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

Purposes for using information

In addition to the purposes mentioned above, we may use your information for the following purposes:

- To communicate with you (such as through email) about products that you have downloaded and services that you have signed up for, changes to this Privacy Policy, changes to the Terms of Service, or important notices;
- To keep you posted on new products and services, upcoming events, offers, promotions and other information that we think will be of interest to you;
- To ask you to participate in surveys, or to solicit feedback on our trainings and events;
- To set up and maintain your account, and to do all other things required for providing our services, such as enabling collaboration, providing website and mail hosting, and backing up and restoring your data;
- To provide user support, and to analyse and improve our interactions with members;
- To detect and prevent fraudulent transactions and other illegal activities, to report spam, and to protect the rights and interests of HB4x4R, HB4x4R's users, third parties and the public;
- To update, expand and analyse our records, identify new members, and provide trainings and events that may be of interest to you;

Legal bases for collecting and using information

Legal processing bases applicable to HB4x4R: If you are an individual from the United Kingdom, our legal basis for information collection and use depends on the personal information concerned and the context in which we collect it. Most of our information collection and processing activities are typically based on (i) contractual necessity, (ii) one or more legitimate interests of HB4x4R or a third party that are not overridden by your data protection interests, or (iii) your consent. Sometimes, we may be legally required to collect your information, or may need your personal information to protect your vital interests or those of another person.

Withdrawal of consent: Where we rely on your consent as the legal basis, you have the right to withdraw your consent at any time, but this will not affect any processing that has already taken place.

Legitimate interests notice: Where we rely on legitimate interests as the legal basis and those legitimate interests are not specified above, we will clearly explain to you what those legitimate interests are at the time that we collect your information.

Your choice in information use

Opt out of non-essential electronic communications: Opt out of non-essential electronic communications: You may opt out of receiving newsletters and other non-essential messages by using the 'unsubscribe' function included in all such messages. However, you will continue to receive essential notices and emails such as account notification emails (password change, renewal reminders, etc.), security incident alerts, security and privacy update notifications, and essential transactional and payment related emails, and Standby or Call-Out notifications via SMS or email.

Disable cookies: You can disable browser cookies before visiting our websites. However, if you do so, you may not be able to use certain features of the websites properly.

Optional information: You can choose not to provide optional profile information such as your photo, but this applies only for our Forum. We still require a photo for your membership ID card. You can also delete or change your optional profile information. You can always choose not to fill in non-mandatory fields when you submit any form linked to our websites.

Who we share your information with

Only certain third parties have access to the information covered in Part I. and only to what is needed to organise an event or training you have signed up for. We do not sell any personal information. We share your information only in the ways that are described in this Privacy Policy, and only with parties who adopt appropriate confidentiality and security measures.

Employees: Employees of the HB4x4R group have access to the information covered in Part I on a need-to-know basis. We require all employees of HB4x4R to follow this Privacy Policy for personal information that we share with them.

Third-party service providers: We may need to share your personal information and aggregated or de-identified information with third-party service providers that we engage, such as training and event organizers and payment processors. These service providers are authorized to use your personal information only as necessary to provide these services to us.

Other cases: Other scenarios in which we may share the same information covered under Parts I and II are described in Part III.

Your rights with respect to information we hold about you as a controller

If you are in the UK, you have the following rights with respect to information that HB4x4R holds about you. HB4x4R undertakes to provide you the same rights no matter where you choose to live.

Right to access: You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the information's source, purpose and period of processing, and the persons to whom the information is shared

Right to rectification: You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.

Right to erasure: You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.

Right to restriction of processing: You may also have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Right to data portability: You have the right to transfer your information to a third party in a structured, commonly used, and machine-readable format, in circumstances where the information is processed with your consent or by automated means.

Right to object: You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.

Right to complain: You have the right to complain to the Information Commissioner's Office (ICO) if you have any grievance against the way we collect, use, or share your information.

Retention of information

We retain your personal information for as long as it is required for the purposes stated in this Privacy Policy. Sometimes, we may retain your information for longer periods as permitted or required by law, such as to maintain suppression lists, prevent abuse, if required in connection with a legal claim or proceeding, to enforce our agreements, for tax, accounting, or to comply with other legal obligations.

When we no longer have a legitimate need to process your information, we will delete or anonymize your information from our active databases. We will also securely store the information and isolate it from further processing on backup discs until deletion is possible.

Part II – Information that HB4x4R processes on your behalf

Information entrusted to HB4x4R and purpose

Information provided in connection with services: You may entrust information that you or your organization (“you”) control, to HB4x4R in connection with use of our services or for requesting support.

The data may either be stored on our servers when you use our services, or transferred or shared to us as part of a request for support or other services.

Information from mobile devices: When you elect to allow it, some of our mobile applications have access to the camera and photo library on your mobile device. Our applications require such access to provide their services. Similarly, when you elect to provide access, location-based information is also collected for. This information will be exclusively shared with our mapping providers and will be used only for mapping user locations. You may disable the mobile applications' access to this information at any time by editing the settings on your mobile device. The data stored on your mobile device and their location information to which the mobile applications have access will be used in the context of the mobile application and transferred to and associated with your account in the corresponding services (in which case the data will be stored on our servers) or products (in which case the data will remain with you unless you share it with us).

(All the information entrusted to HB4x4R is collectively termed “service data”)

Ownership and control of your service data

We recognize that you own your service data. We provide you complete control of your service data by providing you the ability to (i) access your service data, (ii) share your service data through supported third-party integrations, and (iii) request export or deletion of your service data.

How we use service data

We process your service data when you provide us instructions through the various modules of our services. For example, when you generate an incident (Self-Deploy) using our Responder Manager service, information such as the name and address of you will be used to generate the incident; and when you use our event management service for signing up to events and trainings, the email addresses of the persons on the mailing list (the event manager’s or instructor’s) will be used for sending the emails.

Who we share service data with

HB4x4R group and third party sub-contractors : HB4x4R group and third party sub-contractors : In order to provide training and event support, the contracting entity within the HB4x4R group engages other group entities and third parties.

Employees and independent contractors: We may provide access to your service data to our employees and individuals who are also members of the HB4x4R group involved in providing the services (collectively our “employees”) so that they can (i) identify, analyse and resolve errors, (ii) manually verify emails reported as spam to improve spam detection, or (iii) manually verify scanned images that you submit to us to verify the accuracy of optical character recognition. We ensure that access by our employees to your service data is restricted to specific individuals and is logged and audited. Our employees will also have access to data that you knowingly share with us for technical support or to import data into our products or services. We communicate our privacy and security guidelines to our employees and strictly enforce privacy safeguards within the HB4x4R group.

Collaborators and other users: Some of our products or services allow you to collaborate with other users or third parties. Initiating collaboration may enable other collaborators to view some or all your profile information. For example, when you edit a document that you have shared with other persons for collaboration, your name and profile picture will be displayed next to your edits to allow your collaborators to know that you made those edits.

Third-party integrations you have enabled: Most of our products and services support integrations with third-party products and services. If you choose to enable any third-party integrations, you may be allowing the third party to access your service data and personal information about you. We encourage you to review the privacy practices of the third-party services and products before you enable integrations with them.

Other cases: Other scenarios in which we may share information that are common to information covered under Parts I and II are described in Part III.

Retention of information

We hold the data in your account as long as you choose to stay a member of the HB4x4R. Once you terminate your HB4x4R membership, your data will eventually get deleted from active database during the next clean-up that occurs once in 6 months. The data deleted from active database will be deleted from backups after 3 months

Data subject requests

If you are from the United Kingdom and you believe that we store, use, or process your information on behalf of one of our customers, please contact the customer if you would like to access, rectify, erase, restrict or object to processing, or export your personal data. We will extend our support to our customer in responding to your request within a reasonable timeframe.

Part III – General

Children's personal information

Our products and services are not directed to individuals under 21. HB4x4R does not knowingly collect personal information from children who are under 16 years of age for its own purposes. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you believe that a child under 16 years has provided personal information to us, please write to membership@hampshire4x4response.co.uk with the details, and we will take the necessary steps to delete the information we hold about that child. However, using our services, you can collect information about individuals who may be children. If you process information relating to children, you acknowledge and agree that you will be responsible for complying with the applicable laws and regulations related to protection of such personal information.

How secure is your information

At HB4x4R, we take data security very seriously. We have taken steps to implement appropriate administrative, technical & physical safeguards to prevent unauthorized access, use, modification, disclosure or destruction of the information you entrust to us. If you have any concerns regarding the security of your data, we encourage you to check our Security Policy or write to us at chairman@hampshire4x4response.co.uk with any questions.

Data Protection Officer

We have also appointed a Data Protection Officer to oversee our management of your personal information in accordance with this Privacy Policy and registered the Data Protection Officer with the Information Commissioner's office. If you have any questions or concerns about our privacy practices with respect to your personal information, you can reach out to our Data Protection Officer by sending an email to chairman@hampshire4x4response.co.uk or by writing to: Data Protection Officer, Hants & Berks 4x4 Response Group, 2a Albert Road, Caversham, Reading, RG4 7PE.

Locations and transfers

We share your personal information and service data within the HB4x4R Group and with third parties engaged by HB4x4R Group for the purposes described above. By accessing or using our services or otherwise providing personal information or service data to us, you understand that the processing, transfer, and storage of your personal information or Service Data is within the United Kingdom where HB4x4R operates. Such transfers are subject to appropriate data protection agreements as required by the applicable laws in the United Kingdom.

External links on our websites

Some pages of our websites may contain links to websites that are not linked to this Privacy Policy. If you submit your personal information to any of these third-party sites, your personal information is governed by their privacy policies. As a safety measure, we recommend that you not share any personal information with these third parties unless you've checked their privacy policies and assured yourself of their privacy practices.

Blogs and forums

We offer publicly accessible blogs and forums on our websites. Please be aware that any information you provide on these blogs and forums may be used to contact you with unsolicited messages. We urge you to be cautious in disclosing personal information in our blogs and forums. HB4x4R is not responsible for the personal information you elect to disclose publicly. Your posts and certain profile information may remain even after you terminate your account with HB4x4R. To request the removal of your information from our blogs and forums, you can contact us at webmaster@hampshire4x4response.co.uk.

Social media widgets

Our websites include social media widgets such as Facebook "like" buttons and Twitter "tweet" buttons that let you share articles and other information. These widgets may collect information such as your IP address and the pages you navigate on the website, and may set a cookie to enable the widgets to function properly. Your interactions with these widgets are governed by the privacy policies of the companies providing them.

Disclosures in compliance with legal obligations

We may be required by law to preserve or disclose your personal information and service data to comply with any applicable law, regulation, legal process, or governmental request, including to meet national security requirements.

Enforcement of our rights

We may disclose personal information and service data to a third party if we believe that such disclosure is necessary for preventing fraud, spam filtering, investigating any suspected illegal activity, enforcing our agreements or policies, or protecting the safety of our users.

Business Transfers

We do not intend to sell our business. However, in the unlikely event that we sell our business or get acquired or merged, we will ensure that the acquiring entity is legally bound to honour our commitments to you. We will notify you via email or through a prominent notice on our website of any change in ownership or in the uses of your personal information and service data. We will also notify you about any choices you may have regarding your personal information and service data.

Compliance with this Privacy Policy

We make every effort, including periodic reviews, to ensure that personal information you provide is used in conformity with this Privacy Policy. If you have any concerns about our adherence to this Privacy Policy or the manner in which your personal information is used, kindly write to us membership@hampshire4x4response.co.uk. We'll contact you, and if required, coordinate with the appropriate regulatory authorities to effectively address your concerns.

Notification of changes

We may modify the Privacy Policy at any time, upon notifying you through a service announcement or by sending an email to your primary email address. If we make significant changes to the Privacy Policy that affect your rights, you will be provided with at least 30 days' advance notice of the changes by email to your primary email address.

However, if you have not verified your email address, you may miss important notifications that we send through email. If you think that the updated Privacy Policy affects your rights with respect to your use of our products or services, you may terminate your use by sending us an email within 30 days. Your continued use after the effective date of changes to the Privacy Policy will be deemed to be your agreement to the modified Privacy Policy. You will not receive email notification of minor changes to the Privacy Policy. If you are concerned about how your personal information is used, you should check back at <https://manager.hampshire4x4response.net/privacy/HantsBerks-DataPrivacyPolicy.pdf> periodically.