Privacy Policy

How we use your information

It applies to information we collect when people:

- Visit our website
- Contact us by email, in person or over the phone or on our webform
- Consent to the use of cookies or passive technologies on your browser

Visiting our website

If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

The only people who have access to personal information submitted on this website are those who have a legitimate need to; this includes the Motorsport team responsible for the running and maintenance of the website.

Isle of Man Government Website

DfE also has a sub-site on The Isle of Man Government website, <u>gov.im/enterprise</u>; this website is owned by the Cabinet Office. <u>Their Privacy Notice in relation to how you use gov.im can be found at</u> <u>their website</u>.

<u>TT Races has a sub-site on Visit Isle of Man website</u>, however, Motorsport does not directly collect or process any personal information from this site. The website is owned by Visit Isle of Man. Any personal information collected from this sub-site will be processed by Visit Isle of Man.

Contact us by email, in person or over the phone or on our webform

We will only ask for your name and postal or email contact details. You may choose to provide extra information if you are making an enquiry. Email mailboxes are accessed by only a select number of staff central to TT Races who are able to allocate enquiries out to the team who will be able to address your enquiry or request. Such emails will only be shared outside the Department with your knowing, and only do so in order to address your enquiry or request.

We securely store personal information electronically and manually:

Ongoing email communications are stored on our Isle of Man Government email system, Microsoft Outlook

We have three main records management tools across TT Races all specifically designed for the type and use of the information recorded; depending on the nature and destination of your communication, your information will likely be stored in either: Microsoft Dynamics CRM or the Isle of Man Government secure network.

In normal circumstances we will only keep a record of this communication in an active area (e.g. emails will be used in Outlook) until the request or enquiry has been fulfilled; after this time they will be kept for 6 months in one of our records management systems.

Consenting to the use of Cookies and Passive Technologies on your Browser

What is a Cookie?

Cookies and passive technologies are pieces of information that a website transfers to your computer. Cookies can make the web more useful by storing information about your preferences on particular sites, enabling us to provide more useful features for you. They contain no name or address information or any information that will enable anyone to contact you via telephone, email or any other means, the cookies used are listed by in What Personal Information we might collect and why. Most browsers are initially set to accept cookies. If you would prefer, you can set your browser to disable cookies or inform you when they are set. However, given that we may sometimes use cookies to ensure and enhance the performance of our websites, you may not be able to take full advantage of our website if you do disable them.

Passive technologies

TT Races use also third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either us or any third party.

Consenting to cookie and passive technology use

The first time you visit each of our website, you will be provided with an option to approve (or "optin") to the use of all cookies on the website with a pop up in the bottom right-hand corner. We have no way of knowing whether you allow cookies or not, and no way to trace your selection back to you. Instead, your own internet browser remembers the selection so it will treat that cookie the same each time (until you change your cookie settings).

Withdrawing consent to cookie and passive technology use

You can usually manage and disable all cookies and passive technologies directly through your internet browser; you may therefore find it helpful to check the guidance provided by your internet browser provider. The most common providers and links to their guidance on cookies and passive technologies have been provided below:

- Google Chrome
- <u>Microsoft Internet Explorer</u>
- <u>Microsoft Edge</u>
- Mozilla Firefox
- Apple Safari
- <u>Opera</u>

What cookies do we use?

Cookie Issued Purpose Expires

ASPSESSIONID sharedjs.nmspace.net These cookies identify a user, making it easier for them to use the dynamic features of the site without having to provide the same information again as they move from one page to another. Until the website browser is closed

Ci_Id 6 months from when set or updated. Can be removed by user

firsttime By this website Until the website browser is closed

Google Analytics

___utma Performance: to measure and improve site quality through analysis of visitor behaviour. 2 years from when set or updated. Can be removed by user

Google Analytics

___utmb ___utmc Performance: These cookies are used to record how long a visitor remains on the site. Used to measure and improve site quality through analysis of visitor behaviour. Until the website browser is closed.

Google Analytics

___utmz By this website Performance: This cookie is used to record where a visitor came from - e.g. search engine traffic, ad campaigns and page navigation. Used to measure and improve site quality through analysis of visitor behaviour. 6 months from when set or updated. Can be removed by user

PHPSESSID By this website Identification. These cookies identify a user, making it easier for them to use the dynamic features of the site without having to provide the same information again as they move from one page to another. Until the website browser is closed

Why will we process personal data (aka "the legal basis")

We will only process your personal information if a lawful basis exists:

Consent if we rely on your consent to process your information, we will make it obvious what we are asking for consent to do and always tell you how you can withdraw your consent e.g. registering for services, newsletters and competitions.

Public task if it is the public interest for us to collect or store e.g. when handling enquiries from members of the public

How will we securely process personal data?

All personal information is kept with the highest standards and safeguards in place. This includes technical security, preventing unauthorised access, undertaking audits and maintaining backups:

Emails - Email communications are stored on our Isle of Man Government email system, Microsoft Outlook We encrypt and protect all our emails in line with government standards. If your email service does not support this encryption, you should be aware that any emails we send or receive may not be protected in transit. We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law

Microsoft Dynamics CRM - Only certain members of staff will have access to your personal information on CRM and there is security in place to ensure this. The administration of CRM is undertaken by Government Technology Services in the Cabinet Office; however, they are unable to access the content of any records and so will not be able to access your personal information.

Isle of Man Government Secure Network - There are strict access controls in place meaning that only those within specific Divisions can access team folders; in addition, only the teams within the Divisions who are able to access personal information, are those that have a business need to do so. The administration of the IOMG Secure Network is undertaken by Government Technology Services in the Cabinet Office; however, they are unable to access the content of any records and so will not be able to access your personal information **Manual records** - We do not routinely store manual records, however, those that are already in storage and an new records we are required to hold any manually are either stored onsite or in a third party storage facility with whom we have a data protection agreements in place.

Your rights as a data subject and access to personal information

Under the Data Protection Act, you have rights as an individual which you can exercise in relation to the information we hold about you. At any point while we are in possession of or processing your personal information, you, the data subject, have the following rights:

Access: You have the right to request a copy of the information that we hold about you.

Rectification: You have a right to correct data that we hold about you that is inaccurate or incomplete.

Erasure: In certain circumstances you can ask for the data we hold about you to be erased from our records.

Restriction of processing: Where certain conditions apply, you have a right to restrict the processing of your data.

Portability: You have the right to have the data we hold about you transferred to another organisation.

Objection: You have the right to object to certain types of processing such as direct marketing.

Objection to automated processing: You also have the right to be subject to the legal effects of automated processing including profiling.

Judicial review: In the event that the Department for Enterprise refuses your request under rights of access, we will provide you with a reason as to why. You then have the right to complain as outlined in Complaints

You can find out more about these rights by contacting our Data Protection Officer using the details at the end of this notice.

Complaints

In the event that you wish to make a complaint about how your personal information is being processed by TT Races (or third parties), or how your complaint has been handled, you have the right to lodge a complaint directly with our Data Protection Officer in the first instance; as well as the Isle of Man Information Commissioner.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of TT Races collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

Miscellaneous

Under what circumstances can TT Races contact me?

Our aim is never to be intrusive, and we aim to always avoid asking irrelevant or unnecessary questions. Moreover, any information you provide us will always be subject to rigorous measures and procedures to maintain your privacy. You will never be contacted by a means you did not consent to when providing us with your data.

Retention period

We only use personal information for as long as it is needed and will store it for the shortest amount of time possible, in accordance with the law.

Processing special category (sensitive) data and the data of children (under 16s)

We have to put additional measures in place if we plan to process any special category personal data, including ethnic origin or religion; however, TT Races does not process any special category personal information using this website. In order to process the personal information of children, we would have to put additional measures in place because they may be less aware of the risks involved. TT Races does not target any services to children and does not process the personal information of children for marketing purposes, competitions or registering for services or user profiles.

Sending us a private message on social media

In addition to this website, TT Races also has social media profiles. We include them in this notice for completeness: You may choose to provide us with personal information on our social media platforms; we ask that you do also check the platform's privacy policy and terms of service prior to sending us anything.

Social media message boxes are accessed by the motorsport team who have responsibility for maintaining TT Races social media platforms. Such messages will only be shared outside TT Races with your knowing, and only in order to address your enquiry or request. The Motorsport team may at certain times require a third party to manage TT Races social media; if this happens this policy will be revised. Social media messages will only be kept for a month after the conclusion of the enquiry.

Contact

For any privacy enquiries, please feel free to contact our Data Protection Officer, or the Isle of Man Information Commissioner:

Department for Enterprise Data Protection Officer

Address: St George's Court, Upper Church Street, Douglas, Isle of Man, IM1 1EX

Telephone: +44 1624 686733 Email: DPO-DfE@gov.im

Isle of Man Information Commissioner

Address: Isle of Man Information Commissioner, P.O. Box 69, Douglas, Isle of Man, IM99 1EQ

Telephone: +44 1624 693 Email: ask@inforights.im Website: inforights.im

Notice Issued under TT Isle of Man Data Protection Policy on 01-Oct-2018; subject to annual review