

Broadclyst Rifle Club

General Data Protection Regulation Privacy Policy

About this policy

This policy explains when and why we at Broadclyst Rifle Club collect personal information about our members, how we use it and keep it secure, and Club members' rights in relation to it. This includes probationary members, visitors and guests. We will collect, use and store personal data as described in this Policy when people engage in activities at the Club. Normally this will be through some level of membership.

We reserve the right to amend this Policy from time to time without prior notice. Please check our Club notice board regularly for any amendments. We will only share your personal data with third parties as outlined below.

We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk).

Responsible person

For the purposes of the GDPR, the Club Secretary will be the "Controller" of all personal data we hold about Club members and others. The Club Secretary is responsible for making sure the club complies with the GDPR, which applies from 25 May 2018. We will review personal data every year to establish whether we are still entitled to process it.

Member's rights

You have rights under the GDPR

- to access your personal data
- to be provided with information about how your personal data is processed
- to have your personal data corrected
- to have your personal data erased in **certain circumstances**
- to object to or restrict how your personal data is processed in **certain circumstances**

For more details, please address any questions, comments and requests regarding our data processing practices to the Secretary.

Specific use and sharing of personal information

Your personal data (including your name, address, contact details and date and place of birth) will be used to notify the Police when you apply to join the Club and for any appropriate notifications as required by law. In general your personal data will only be used for the purposes of membership management (renewals, etc), and your email and telephone numbers may be used for communication about news/work at the Club, range closure, competition entries/results and other important notices. Your name and other contact details may be shared with our current National Governing Body (NGB) which is the National Small-bore Rifle Association (NSRA) and its recommended Insurers. Your personal data will not be passed to anyone else outside the Club, and your email address will only be given to someone outside the Club with your permission.

The lawful reasons for processing your data

We have three lawful reasons for processing your data.

(a). Processing is necessary for compliance with our legal obligations (eg: under the Firearms (Amendment) Act 1988 and similar legislation relating to firearms clubs.

(b). Processing of your data is necessary for the administration of your Club membership.

(c). You have given consent to the processing of your data by signing our privacy statement for the specific purposes set out in this Policy.

The tables below give further explanation of which lawful reason applies to which data, why we collect it and who we may be required to share it with. The Club will make every effort to ensure that data is only shared with organizations which are GDPR compliant.

What Information we collect, why we collect it, and who we share it with

In addition to the reasons stated below we may have to disclose your data where we have a legal obligation to do so.

Data processed under our legal obligation

Requirements of Home Office Approval

The Club is a Home Office Approved Rifle Club. This means that the Club will

- Appoint a Police Liaison Officer – currently the Secretary
- Maintain a register of attendance of all members with details of the firearms used by them
- Inform the Police of any person other than a guest who has ceased to be a member for whatever reason
- Inform the Police of any person other than a guest who has not shot at the Club for a period of 12 months
- Inform the Police of any application for membership giving the applicant’s full name and address, other contact details, date and place of birth and the date on which they applied to become a member

Also see <https://www.gov.uk/government/publications/approval-of-rifle-and-muzzle-loading-pistol-clubs>

Type of information	Purpose	Shared with
Members, probationary members and shooting guests - name and address	To meet our legal obligations	Committee and associated working groups Police and/or Home Office representative
Date and place of birth		
FAC details (if any)		
Club attendances and firearms used		
Dates full and probationary membership commenced and ended		

Please note that data processed for compliance with the Firearms (Amendment) Act 1988 must be kept for 6 years from the end of your membership and is therefore exempt for your right to erasure under GDPR.

Data processed as a requirement of managing your membership

Type of information	Purpose	Shared with
Members, probationary members and shooting guests - address, telephone number and e-mail address	Managing the membership of the Club and for Club insurance purposes	Committee and associated working groups
Dates full and probationary membership commenced and ended	Managing the membership of the Club and Club insurance purposes	

Date of birth and age-related information	Managing membership categories which are age-related	Committee and associated working groups
Gender	Provision of adequate facilities for members	
FAC details	Duty of care to ensure firearms are being used lawfully on Club premises	
Section 21 and Child Protection Policy declarations	Ensuring individual compliance with legislation	
References	To check the applicants suitability for membership	
Disabilities	Provision of adequate facilities for members (where possible)	
Emergency contact details.	Contacting next of kin in the event of emergency	Emergency services
First Aiders names and contact details	To provide a contact point in case of emergency	Members and probationary members
Qualifications	Range Conducting Officer (RCO), Instructor and Coaching qualifications for quality assurance purposes	
Competency	For accreditation and issue of competency cards	

Please note that data processed for compliance with insurance purposes must be kept for 30 years from the end of your membership and is therefore exempt from your right to erasure under GDPR.

Data processed with your consent

The Club will seek consent in the application form before processing any information as outlined below.

Type of information	Purpose	Shared with
Members, probationary members and shooting guests - address, telephone numbers, e-mail address	Managing the membership of the Club	NGBs and other shooting organizations – eg: the NSRA, British Shooting, County Associations, etc
Date of birth and age-related information.	Managing membership categories which are age-related, and age-related competition opportunities	
Gender.	Provision of adequate facilities for members. Gender related competition opportunities For the purposes of Reporting gender data.	

Disabilities	Provision of adequate facilities for members (where possible). Providing competitive and other opportunities.	
Competency	For accreditation and issue of competency cards	
Qualification	RCO, Instructor and Coaching qualifications for quality assurance purposes	
Scores	For performance measures related to competition and selection For media publicity of events	
Photos and videos of members and their firearms	Putting on the Club's website and social media pages and using in press releases	With permission of the members in each instance.
Instructors names, addresses, email addresses, telephone numbers and relevant qualifications and/or experience	Managing coaching, instruction and supervision of shooting activities	Members, probationary members, other clubs and shooting associations, and NGBs
Members names, addresses, telephone numbers and e-mail addresses	Website access, and information and newsletter distribution	Web and newsletter publishers – members consent will be requested prior to membership/renewal

The Club may be asked to share personal information we process about an individual and their name, address and email address with appropriate NGBs. These include the NSRA.

Enquiries and other communications with the Club

When dealing with an enquiry about the Club we may hold your details for a period of time to deal with the enquiry. Any emails and other communications with the Club will only be retained for such period of time as is appropriate to the content or request. Club emails will be purged on a regular basis. People added to a Club waiting list for membership will be informed and asked for permission to store their data at that point.

Children

Parents or guardians signing the probationary or full membership form for their child are giving their permission for the child's data to be used as described in this Policy.

How we protect your personal data

The data Controller will process membership information electronically and hold such information on a database on the Controller's home PC. Some data will also be held on the Club's PC and on its Treasurer's home PC. A backup of this information will be held on a memory stick held by the Treasurer. Paper copies of data will be held at the Secretary's home address and secured in a locked filing cabinet. If it is necessary to transport data it will be kept secure.

Coaches and Instructors will also process and hold information pertaining to members under their instruction and necessary information will be made available to Coaches and Instructors as required.

For any on-line payments which we may receive from members, probationers, visitors and guests we will use a recognized online secure payment system.

In the unlikely event of a breach of the security of data we will notify members promptly.

We will never sell or pass on your personal data.

Request to see your personal information

If you wish to know what personal data the Club holds please email the Secretary and he will respond within 14 days of the request (depending on availability).

Accuracy and retention of data

Each individual member is responsible for keeping the Secretary informed of any changes to their data (eg: address, telephone number, email address, etc) so this may be updated. Your authority for the Club to continue to hold your data will be requested at least once a year at renewal, and your consent is required for continuing membership of the Club.

The data are kept securely on file at the Secretary's home address (53 Winslade Park Avenue, Clyst St Mary, EX51DB) and at the Treasurer's home address (1 Godolphin Close, Newton St Cyres, EX5 5BZ). The data will normally be kept for up to 7 years (unless a longer period is stated elsewhere in this Policy). It may be kept for a longer period for reasons of legal and civil action or other ongoing case management. Members' names, addresses and period of membership will be kept for up to 30 years for management of historical insurance claims. Names and scores may be kept indefinitely for reason of historical significance – eg: on trophies, plaques and other awards.

CCTV Images (not collected by BRC at May 2018)

The Club does not currently make or store CCTV images of members or activities on Club premises. Should this change a suitable amendment will be made to this policy and circulated to members.

May 2018 v2