

Holwell Rifle Club

General Data Protection Regulations Privacy Policy

About this policy

This policy explains when and why we Holwell Rifle Club collect personal information about our members and how we use it; keep it secure and club member's rights in relation to it. This includes probationary members, visitors and guests. We will collect, use and store personal data, as described in this Data Protection 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 Data Protection Policy from time to time without prior notice. You are advised to check our Club notice board regularly for any amendments and the club website:

www.holwellrc.co.uk. We will only share your personal data with any 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 Secretary is responsible for making sure the club complies with the General Data Protection Regulation (GDPR) which applies from 25 May 2018. We will review personal data every year to establish whether we are still entitled to process it or not.

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 (name, address, date of birth) will be used to notify the Police when you 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 etc. Your name may be shared with our current National Governing Body (NGB) (NSRA). Your personal data will not be passed to anyone else outside the club and your email 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, which are:

- (a) Processing is necessary for compliance with our legal obligation (Firearm Amendment Act 1988 c.45 Exemptions Section 15 – Firearms clubs)
- (b) Processing of your data is necessary for the administration of your membership contract.
- (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 data is only shared with organisations that 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 an inescapable legal obligation or where we believe that there is an overriding issue of public safety.

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
- Maintain a register of attendance of all members with details of the firearm used
- Inform the Police of any person who holds a Firearm Certificate who has ceased to be a member for whatever reason
- Inform the Police of any person who holds a Firearm 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, date and place of birth prior to their being accepted for membership.

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 guest's names and address.	To meet our legal obligations	<ul style="list-style-type: none">• Committee and associated Holwell Rifle Club working groups• Police and/or Home office representative
Date and place of birth		
FAC details		
Club Attendance and firearms used		
Dates full and probationary membership commenced and ended.		

Please note data processed for compliance with the Firearm Amendment Act 1988 must be kept for at least 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
Member's, probationary members and shooting guests, address, telephone numbers, e-mail address	Managing the Member's membership of the Club and club insurance purposes.	Committee and Holwell Rifle Club associated working groups
Dates full and probationary membership commenced and ended.	Managing the Member's membership of the Club and club insurance purposes.	
Date of birth / age related information.	Managing membership categories which are age related.	
Gender.	Provision of adequate facilities for members.	
FAC details	Duty of care to ensure firearms are being used lawfully on club premises	
Section 21 declaration	Ensuring individual compliance with legislation	
References	To check the applicants suitability for membership.	

Disabilities	Provision of adequate facilities for members.	
Emergency contact details.	Contacting next of kin in the event of emergency.	Emergency services
Skills and Professional Qualifications	To potentially assist in the maintenance and management of the club	Committee
First Aiders names	To provide a contact point in case of emergency	Members and probationary members
Qualifications	RCO, Instructor and Coaching qualifications for quality assurance purposes	
Competency	For accreditation and issue of competency cards	

Please note data processed for compliance with insurance purposes must be kept for 30 years from the end of your membership and is therefore exempt for 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
Member's, probationary members and shooting guests, address, telephone numbers, e-mail address	Managing the Member's membership of the Club.	National Governing Bodies (NGB) and other shooting organisations e.g. British Shooting, County Associations etc.
Date of birth / age related information.	Managing membership categories which are age related. 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. 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.	Only with permission of the members in each instance.
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing coaching, instruction and supervision of shooting activity	Members, probationary members, other clubs and shooting associations and NGBs

Member's name, address, telephone numbers, e-mail address	Website access and newsletter distribution	Web and newsletter publishers – members consent will be requested separate to membership/renewal
---	--	--

The club may be asked to share personal information we process about an individual with the NSRA. Currently we only share members names.

Enquiries and other communications with the club

When enquiring 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 a period of time appropriate to the content or request. Club emails will be purged on a regular basis. People will only be added to a club waiting list when they have completed a membership application form. Once the Police have been informed of the application for membership it may be kept for up to six years whether or not the applicant becomes a member.

Children

Appropriate adults signing the probationary or full membership form are giving their permission for the data to be used as described elsewhere in this policy. They will be required to state their relationship to the child or young person.

How we protect your personal data

The Data Controller will process membership information electronically and hold all information on a database on encrypted storage media. An encrypted backup of this information may be held in the club armoury. Paper copies of data will be held at under secure arrangements. If it is necessary to transport data it will be kept secure. Coaches and instructors will also process and hold information pertaining to people under their instruction and necessary information will be made available to coaches and instructors only as required.

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

In the unlikely event of a breach of the security of data we will notify members promptly and 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/she 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 changes to their data (e.g. address/telephone number etc. and this is updated at least once a year at renewal and you are at that time authorising the club to hold such data on file.

The data are kept on file under the Secretary's control. The data will be normally be kept for up to 7 years following the cessation of membership. It may be kept for a longer period for reasons of legal and civil action or other ongoing case management. Name, address and length 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 – e.g. on trophies, plaques and other awards.

Thursday, 10 May 2018