Bury St Edmunds Smallbore Rifle Club (BSE SB RC)

**General Data Protection Regulation**

**Privacy Policy**

(May 2018)

**About this policy**

This policy explains when and why we, BSE SB RC, collect personal information about our members and how we use it; 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 Privacy 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 Privacy Policy from time to time without prior notice. You are advised to check our Club notice board regularly for any amendments including our website <https://bsesbrifleclub.weebly.com>. 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 and place 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/address and email address may be shared with our current National Governing Body (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.

**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 firearm used, coded to support anonymity where possible.
* Inform the Police of any person other than a guest member 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, date and place of birth and the date on which they became a member

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

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| **Type of information** | **Purpose** | **Shared with** |
| Names and addresses of members and probationary members. | To meet our legal obligations | * Committee and associated 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. |
| Names and addresses of shooting guests. | To meet our legal obligations | * Committee and associated working groups * Police and/or Home office representative |

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

**Data processed as a requirement of managing your membership**

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| **Type of information** | **Purpose** | **Shared with** |
| Names, addresses, telephone numbers, e-mail addresses of members and probationary members | Managing the Member’s relationship with the Club and insurance purposes. | Committee and associated working groups  Committee and associated working groups |
| Dates full and probationary membership commenced and ended. | Managing the Member’s relationship with the Club and insurance purposes. |
| Date of birth / age related information. | Managing age related.  membership categories. |
| Names and addresses of shooting guests. | Managing the relationship with the Club and insurance purposes. |
| FAC details (Number and issuing authority) | 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 applicant’s suitability for membership. |
| Qualifications | RCO, Instructor and Coaching qualifications for quality assurance purposes |

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 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.

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| **Type of information** | **Purpose** | **Shared with** |
| Names, addresses, telephone numbers, e-mail addresses of members and probationary members. | Managing the member’s relationship with the Club. | NGBs 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 |
| Qualifications | 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. |
| 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 – member’s consent will be requested separate to membership/renewal |
| Names, emails and phone numbers of potential entrants to the Club’s open competitions. Scores and placings achieved. | Invitations to the Club’s open competitions.  Publicity of competition results, showing name, score and placing only. | Data to be held and processed by Club Captain and shared as necessary with assistant captains and members helping to organise the open competitions. |

The club may be asked to share personal information we process about an individual and the name, address and email address with an appropriate National Governing Body (NGB) such as the NSRA.

**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 added to a club waiting list for membership will be informed and asked for permission to store that data at that point.

**Children**

Parents or guardians signing the probationary or full membership form are giving their permission for the data to be used as described elsewhere in this policy.

**How we protect your personal data**

The Data Controller will process membership information electronically and hold all information on a database on a secure computer. A backup of this information will be held on (on an external hard drive). Paper copies of data will be held in a locked cupboard on the Club’s premises. 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 (smashingjim@hotmail.com) 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 at the Secretary’s home address. The data will normally be kept for up to 6 years. 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.