



Surbiton Postal Rifle Club General Data Protection Regulation Privacy Policy

About this policy

This policy explains when and why we, Surbiton Postal 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 the Club notice board and website www.surbitonpostalrifleclub.com regularly for any amendments. 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/address and email address may be shared with the National Governing Bodies for shooting (NGBs). Excepting the afore-mentioned reasons, your personal data will not be passed to anyone else outside the club and your email will only be given to someone else 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
- Maintain a register of attendance of all members with details of the firearm used
- 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

See also <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 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 that 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 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 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
Member's photograph	Included on membership card and membership records		Worn while on club premises for anyone to see
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 and club insurance 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 membership application form before processing any information as outlined below.

Type of information	Purpose	Shared with
Member's, probationary members and shooting guests, name, address, telephone numbers, e-mail address	Managing the Member's membership of 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	
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.	
FAC details	Duty of care to ensure firearms are being used lawfully on club premises	
Section 21 declaration	Ensuring individual compliance with legislation	
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
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

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). These include the NSRA and NRA.

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.

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 ensure that membership information processed electronically shall be held on a secure server and only accessed via secure and encrypted channels – e.g. https. The information held on the club's database is stored in the Amazon Web Services cloud, based in London, United Kingdom. Paper copies of Application Forms and Home Office Declarations will be held at the Clubhouse and secured in a locked filing cabinet or, temporarily for processing, at committee member's houses under similar conditions. 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.

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 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 will be normally be kept for up to 7 years but 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.

Period of effect

This policy replaces all previous versions and is effective from 01-Aug-2020 until further notice.