Petworth & District Rifle Club (PDRC)

General Data Protection Regulations
Privacy Policy

About this policy

This policy explains when and why we **PDRC** 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 or our website www.petworth.org.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). This policy is based on the template provided by the NSRA.

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:

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- 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 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
- 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

Type of information	Purpose	Shared with
Members, probationary members and shooting guest's names and address.	To meet our legal obligations	Committee and associated working groups Police and/or Home office representative National Governing Bodies and other shooting organisations e.g. NSRA, County Associations etc. Membership management organisations (e.g. Go Membership)
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 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 National Governing Bodies and other shooting organisations e.g. NSRA, British Shooting, County Associations etc. Membership management organisations (e.g. Go Membership)
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 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 and other shooting organisations e.g. British Shooting, County Associations etc. Membership management organisations (e.g. Go Membership) Competition management organisations
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.	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. Membership management organisations (e.g. Go Membership)

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 and the name, address and email address with an appropriate Local and National Governing Body (NGB). These include NSRA, NRA, SCSRA, WWSSBRA.

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 an encrypted database on secure cloud storage at pcloud.com. An encrypted backup of this information may also be held on removable storage in the safe of the secretary and chairman. Paper copes of data may also be held at the clubhouse, and *secretary's house* and secured by being stored in a locked cabinet. 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 write or email the Secretary or Chairman 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 securely as specified above under "How we protect your data". The data will be normally be kept for up to *7 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.

CCTV Images

CCTV is used to record activities on the ranges at the club in the interests of safety and crime prevention. All images are stored offsite in a secure cloud of the alarm providers (ring.com). The images/data are stored for up to 30days before being automatically deleted by ring.com.
For these reasons the information processed may include visual images, personal appearance and behaviours. This information may be about club members, visitors, guests, offenders and suspected offenders, members of the public and those inside, entering or in the immediate vicinity of the area under surveillance.
Where necessary or required this information is shared with the data subjects themselves, employees and agents, service providers, police forces, security organisations and persons making an enquiry.
Any complaints which rely on this about theft/bullying/abuse etc. must therefore be made within 30 days of the incident otherwise the images will have been overwritten / deleted.