**Felixstowe Rifle Club (FRC)**

**Data Protection Policy**

**About this policy**

This policy explains when and why the FRC collect personal information and how we use it; keep it secure and your rights in relation to it.

We will collect, use and store personal data, as described in this Data Protection Policy when people engage in activities through the Club. This includes members, visitors, guests and other people using the facilities and services of the association.

We reserve the right to amend this Data Protection Policy from time to time without prior notice. You are advised to check regularly for any amendments on the notice board.

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 Secretary of FRC will be the “Data Controller” of all personal data we hold about club members and others, the Membership Secretary and Treasurer will also hold relevant data bases. The Controller is responsible for making sure the organisation complies with the General Data Protection Regulation (GDPR) which applies from 25th May 2018. We will review personal data on a regular basis to establish whether we are still entitled to process it or not.

**Your 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 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

(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. Felixstowe RC 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, The Membership Secretary specifically for initial membership and resignation.
* 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 names and addresses and shooting guest’s names | To meet our legal obligations | * Committee and associated working groups * Police and/or Home office representative |
| Members, probationary members Date and place of birth |
| FAC details |
| Members, probationary members and shooting guest’s Club Attendance and firearms used, (Calibre, Type, Serial Number Date) |
| 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 |
| 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. | NGBs and other shooting organisations e.g. British Shooting, County Associations etc.  Only with specific consent  NGBs and other shooting organisations e.g. British Shooting, County Associations etc.  Only with specific consent  Entry to Competitions internal or external will assume consent for publication of names and scores |
| 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 |
| 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 National Governing Bodies (NGB) or Associations affiliated to at that time. These include NSRA, MLAGB, SCRA, SCRAPS and SCRASBS. This will only be done with specific consent.

**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**

Data processed under our legal obligation will be held by the Secretary and Membership Secretary.

Data held to Manage your membership will be held by the Secretary, Membership Secretary and Treasurer

The Membership Secretary will process membership information electronically and hold all information on a database on a secure computer relevant copies will be held by the Secretary and Treasurer. A backup of this information will be held on an external storage device(s) kept secure. Paper copes of data will be held at the Membership Secretaries House and secured in locked storage. If it is necessary to transport data it will be kept secure. Day sheets will be held by the Treasurer and kept secure.

Attendance and Weapons usage logs will be kept at the Range either secured in the Armoury or Safe.

Coaches and instructors and 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.

Competition organisers will also hold data relevant to their requirements, the entry to competitions having assumes consent being given. 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 [secatfrc@btinternet.com](mailto:secatfrc@btinternet.com) / Membership Secretary [memb\_sec@yahoo.com](mailto:memb_sec@yahoo.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/Membership Secretary’s house in a secure location., some long term storage will be securely in the Club House / Armoury. 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 on disc in pass-word controlled camera control box The images/data are stored for up until they are over-written but no longer than 1 month.

For these reasons the information processed may include visual images, personal appearance and behaviours. This information may be about club members, customers and 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 as soon as possible after the incident otherwise the images will have been over-written.

RSW Mar 2019

**Membership and GeneralInformation**

|  |  |  |
| --- | --- | --- |
| This is necessary to enable us to properly manage and administer your membership contract with the NSRA including merchandise, products and services including the handling of complaints and case management. **Data** | **Use** | **Shared with** |
| All contact and membership details including name, address, phone number, email, date of birth, gender and other contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences. | To administer any membership account(s) you have with us and managing our relationship with you, (including arranging for any insurance) and dealing with payments and any support, service or product enquiries made by you. | Shared internally with other NSRA Departments.  Otherwise where you have given us your explicit consent to do so. |
| All contact and membership details.  Transaction and payment information. | To arrange and manage any contracts for the provision of any merchandise, products and/or services. | Shared internally with other NSRA Departments and Auditors.  Otherwise where you have given us your explicit consent to do so. |
| Bond details | To process bonds | Sub group of Finance Department and Auditors |
| All contact and membership details | To send you information which is included within your membership benefits package, including details about your insurance*,* competitions and events, partner offers and discounts and any updates on small-bore shooting | Shared internally with other NSRA Departments.  Otherwise where you have given us your explicit consent to do so. |
| All contact and membership details | To supply you with On Target, magazine, newsletters and other bulk communications | Magazine agency and other NSRA Departments. |
| All contact and membership details | To administer the Special Awards Committee. | NSRA staff and members of Special Awards Committee. |
| All contact and membership details | To administer involvement in NSRA Board, Committees, Working Groups and other panels. | Shared internally with other NSRA Departments, Committee Members and appropriate external organisations. |
| All contact and membership details. | To provide legal assistance and case management. | Shared internally with other NSRA Departments, Committee Members and appropriate external organisations including insurers and members of the legal profession. |
| Contact details and records of your interactions with us | To answer your queries or complaints | Shared internally with other NSRA Departments.  Otherwise where you have given us your explicit consent to do so. |
| Gift Aid Declarations | To administer Gift Aid | HMRC  Auditors |