

Altrincham Rifle & Pistol Club

General Data Protection Regulations Privacy Policy

About this policy

This policy explains when and why **Altrincham Rifle & Pistol 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 (<http://www.altrinchamtsc.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 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 (altrinchamrpc@gmail.com).

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 (NGB), the National Smallbore Rifle Association (NSRA). Your personal data will not be passed to anyone else outside the club and your email address 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

Altrincham Rifle & Pistol 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

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 representatives
Date and place of birth		
Firearms Certificate (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
Members, probationary members and shooting guests, address, telephone numbers, e-mail address	Managing the Member's membership of the Club and for club insurance purposes	Club Committee and associated working groups
Dates full and probationary membership commenced and ended	Managing the Member's membership of the Club and for 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.	

Type of information	Purpose	Shared with
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 that are processed for compliance with insurance purposes must be kept for 30 years from the end of your membership and are 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:

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
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	Range Conducting Officer (RCO), Instructor and Coaching qualifications for quality assurance purposes.	
Scores	For performance measures related to competition and selection. For media publicity of events.	With permission of the members in each instance
Photos and videos of members and their firearms	Putting on the Club's website and social media pages and using in press releases.	
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 separately from membership/renewal

The club may be asked to share personal information we hold about an individual e.g. name, address and email address with an appropriate NGB. These include British Shooting, the NSRA, Cheshire & North Wales County Rifle & Pistol Association (CNWRPA) & the North West Regional Target Shooting Association (NWR TSA).

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 (approximately 6 monthly). 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 back-up is held on a personal server. The server & the computer together with any paper copies of data will be held at the Secretary's home. If it is necessary to transport data it will be kept secure. Committee members, coaches and instructors may 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 e.g. names/email addresses and phone numbers.

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

The full & probationary members register of attendance and firearms used will be kept locked in the armoury when the club is closed. Copies of previous years' forms are kept at the Secretary's home.

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 (altrinchamrpc@gmail.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 and/or in a secure area on the club's website to enable electronic renewals. The data will be normally be kept for up to 6 years (the data on the website will be removed after the end of the renewal period). 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 data 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 onsite at the club in a locked cabinet. The images/data are stored for **approximately 14 days** and then they are overwritten.

For these reasons the information processed may include visual images, personal appearance and behaviours. This information may be about club members, 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 CCTV about theft/bullying/abuse etc **must therefore be made within 10 days** of the incident otherwise the images will have been overwritten.

24 April 2018