

Marlow Rifle and Pistol Club

General Data Protection Regulation Privacy Policy

About this policy

This policy explains when and why we, Marlow Rifle and Pistol Club (the Club), 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 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 policy from time to time without prior notice. You are advised to check our Club notice board and website regularly for any amendments. We will share your personal data with any third parties only 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 Data 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.

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 apply to join the Club and for any appropriate notifications as required by law enforcement agencies.

In general, your personal data will only be used for the purposes of membership management, and your contact details may be used for communication about matters such as Club news, work at the Club, range closure, competition entries, results and other important notices.

Your name, address and email address may be shared with our current National Governing Bodies (NGBs) and other associations to which we are, from time to time, affiliated.

Your personal data and email address will not be passed to anyone else outside the Club without 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 obligations.
- (b) Processing 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 all reasonable efforts 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 a legal obligation.

Data processed under our legal obligation

Requirements of Home Office Approval

The Club is a Home Office Approved Rifle and Muzzle-Loading Pistol 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, and
- provide any data as required by a law enforcement agency.

Also see 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.		
Section 21 declaration		
Prior refusal or revocation of FAC or SGC		

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

We will not necessarily collect all of this data.

Type of information	Purpose	Shared with
Member's, probationary member's and shooting guest's 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 applicant's suitability for membership.	
Disabilities	Provision of adequate facilities for members.	
Club Attendance and firearms used	Managing the Member's membership of the Club	
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.
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 adult members and their firearms	Putting on the Club's website and social media pages and using in press releases.	With permission of the members, or of the responsible adult in respect of a minor member, 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

Enquiries and other communications with the club

When you enquire 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 be retained only for a period of time appropriate to the content or request. Club emails will be purged on a regular basis. Prospective members added to a Club waiting list for membership will be informed and asked for permission to store that data at that point.

Minors

A parent or guardian signing the probationary or full membership form for a minor is giving permission for that minor's 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 the MRPC Portal.

The MRPC Portal is hosted on a high-level web-hosting package with a company which provides expensive, sophisticated, hosting solutions, which meet all relevant security protocols (ISO 9001, ISO 27001 and ISO 14001).

The data on the MRPC Portal is held behind state-of-the-art firewalls, and double encrypted using AES-256, a 32 character long symmetric password . The data is supported by continuous back-ups and monitoring to ensure performance, reliability and availability.

Paper or electronic copies of relevant subsets of this data will be held by relevant committee members and secured by encryption, by password or by physical locks. If it is necessary to transport data it will be kept secure.

Coaches and instructors will also process and hold information relating to people under their instruction. 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.

We will never sell your data. We will not release your data to anyone outside the Club except as set out in this Policy.

Request to see your personal information

If you wish to know what personal data the club holds please email the Secretary at datacontroller@marlowrifle.com, and he or she will respond within one calendar month after the request (depending on availability).

Accuracy and retention of data

Each individual member is responsible for keeping the Secretary informed of changes to his or her data, and this is also confirmed at least once a year at renewal, and you are at that time authorising the Club to hold that data on file.

The data is stored as set out above. The data will be normally be kept for up to seven 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, for instance on trophies, plaques and other awards.

CCTV Images

CCTV is used at the Club to record activities on the range and in the clubroom in the interests of safety and crime prevention. All images are stored onsite on a hard drive in the inner armoury, and may be accessed by the Secretary, the Club Chairman, and any other person authorised by the Club Committee, remotely through encrypted devices. The images are overwritten after a variable period of time, depending on the amount of recorded activity. Specific images required in connection with an enquiry, investigation or complaint may be copied and retained for as long as is necessary for that purpose.

For these reasons the information processed may include visual images, personal appearance and behaviours. This information may be about Club members, visitors, customers, offenders and suspected

offenders, members of the public and those inside, entering, or in the immediate vicinity of, the area under surveillance.

You have the right to see CCTV images of yourself and be provided with a copy of the images.

Where necessary or required, this information is shared with the data subjects themselves, Club committee members and working groups, employees and agents, service providers, police forces, security organisations and persons making a lawful enquiry.

Any complaint about issues such as a safety issue, breach of Club rules, theft, bullying or abuse, which relies on these images must be made as soon as practicable (and no later than seven days) after the incident, to reduce the risk that the relevant images will have been overwritten.