

Comber Rifle Club

General Data Protection Regulations

Privacy Policy

About this policy

This policy explains when and why we, Comber 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 our Club notice board regularly for any amendments or visit <https://www.comberrc.com>. 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 our current National Governing Body (NSRA/NRA). 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 The Firearms (Northern Ireland) Order 2004
- (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 renewing your membership 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 | <ul style="list-style-type: none">• Committee and associated working groups• Police and/or Home office representative |
| Date 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 Shared with Ballykinlar if security access required for Fullbore range days Name and email address shared with payment processor for renewals |
| 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 services Worn while on club premises for anyone to see. Shared with Ballykinlar if security access required for Fullbore Members and probationary members |
| Emergency contact details. | Contacting next of kin in the event of emergency. | |
| Member's photograph | Included on Membership card and membership records | |
| First Aiders names | To provide a contact point in case of emergency | |
| 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 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 Body (NGB). These include *NSRA, NRA, NISSA, NIFSS etc.*

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 a database on the Membership Secretary's PC, which is encrypted and password protected. A backup of this information will be held on a local encrypted backup drive and an encrypted cloud backup of that machine. 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 email the Secretary 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 / Membership 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 Membership Secretary's home address. 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.