



Chobham & District Rifle Club

Station Road, Chobham, Woking, Surrey, GU24 8AL Tel: 01276 856291

Founded 1909

General Data Protection Regulations Privacy Policy

Version 1 - 25th May 2018

1. About this policy

This policy explains when and why we, Chobham & District 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 or website regularly for any amendments

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).

2. Responsible person

For the purposes of the GDPR, the club Data Protection Controller will be the "controller" of all personal data we hold about club members and others.

The Club Data Protection Controller 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.

3. 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 Data Protection Controller.

4. 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 National Governing Bodies (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.

Section 6 of document details what Information we collect, why we collect it, and who we share it with.

5. The Lawful reasons for processing your data.

We have three lawful reasons for processing your data, which are:

- Processing is necessary for compliance with our legal obligation (Firearm Amendment Act 1988 c.45 Exemptions Section 15 – Firearms clubs).
- Processing of your data is necessary for the administration of your membership contract.
- 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.

6. 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 club President.
- 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.	<ul style="list-style-type: none"> • To meet our legal obligations • Continuing approval of membership 	<ul style="list-style-type: none"> • Membership Secretary • Police Liaison Officer • Police and/or Home office representative
Date and place of birth		
Dates probationary and full membership commenced and ended.		
FAC details		
Club Attendance and firearms used		
Ammunition purchases		

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 the club and your membership

Type of information	Purpose	Shared with
Member's, probationary members and shooting guests, address, telephone numbers, e-mail address	<ul style="list-style-type: none"> Managing the Member's membership of the Club. Club insurance purposes Membership communication 	<ul style="list-style-type: none"> Committee members
Dates full and probationary membership commenced and ended.	<ul style="list-style-type: none"> Managing the Member's membership of the Club insurance purposes. 	
Date of birth / age related information.	<ul style="list-style-type: none"> Managing membership categories which are age related. 	
FAC details	<ul style="list-style-type: none"> Duty of care to ensure firearms are being used lawfully on club premises 	
Section 21 declaration	<ul style="list-style-type: none"> Ensuring individual compliance with legislation 	
References	<ul style="list-style-type: none"> To check the applicant's suitability for membership. 	
Member's photograph	<ul style="list-style-type: none"> Included on Membership application, membership card and membership records. 	<ul style="list-style-type: none"> Worn when on club premises for anyone to see.
Qualifications	<ul style="list-style-type: none"> RCO, Instructor and Coaching qualifications for quality assurance purposes. 	<ul style="list-style-type: none"> Committee Members
Competency	<ul style="list-style-type: none"> For accreditation and issue of competency cards. 	
Range Duty Roster	<ul style="list-style-type: none"> Managing the range duty roster 	<ul style="list-style-type: none"> Members
CCTV images	<ul style="list-style-type: none"> Security and personal safety 	<ul style="list-style-type: none"> Chairman, Vice-Chairman, Data Protection Controller, police and other parties (in accordance with the club CCTV Policy and procedures document).
Key holder register	<ul style="list-style-type: none"> Security and access control 	<ul style="list-style-type: none"> Committee members

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 membership 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.	<ul style="list-style-type: none"> Managing the Member's membership of the Club. 	<ul style="list-style-type: none"> NGBs and other shooting organisations e.g. County Associations etc.
Date of birth / age related information.	<ul style="list-style-type: none"> Managing age related membership categories Age related competition opportunities. 	
Competency	<ul style="list-style-type: none"> For accreditation and issue of competency cards. 	
Shooting discipline	<ul style="list-style-type: none"> For accreditation and issue of competency cards. For informing of relevant competitions 	
Qualification	<ul style="list-style-type: none"> RCO, Instructor and Coaching qualifications for quality assurance purposes 	<ul style="list-style-type: none"> Members and probationary members
Scores, competition results and entry class	<ul style="list-style-type: none"> For performance measures related to competition and selection. Club records including certificates and trophies 	<ul style="list-style-type: none"> Members Displayed on club noticeboard NGBs and other shooting organisations
Photos of members and their firearms	<ul style="list-style-type: none"> Publicity. Historical records. 	<ul style="list-style-type: none"> Displayed in club or website with permission of member in each instance.
Instructor's name and relevant qualifications and/or experience.	<ul style="list-style-type: none"> Managing coaching, instruction and supervision of shooting activity. 	<ul style="list-style-type: none"> Members and probationary members

The club may be asked to share personal information we process about an individual and the name, address and email address with an appropriate NGB or Country Shooting Association of which the club is a member.

8. Inquiries 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.

9. 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.

10. How we protect your personal data;

The Membership Secretary will process membership information electronically and hold all information on a database on a secure computer. Any paper copies will be secured appropriately. If it is necessary to transport data, it will be kept secure.

Committee members will only process and hold personal information as a requirement of managing the club. Coaches and instructors may also process and hold information pertaining to people under their instruction. Necessary information will be made available only to them as required.

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.

11. Request to see your personal information

If you wish to know what personal data the club holds, please email the Data Protection Controller who will respond within 14 days of the request (depending on availability).

12. Accuracy and retention of data

Each individual member is responsible for keeping the Membership Secretary informed of changes to their data (e.g. address/telephone number etc.). 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 at the Membership Secretary's home address and in the club.

The data will normally be kept for up to 6 years after expiry of membership. 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.

13. CCTV Images

CCTV is used to record activities at the club in the interests of safety and crime prevention. The primary purpose is for monitoring the security of the armoury. It is also used to monitor personal safety.

Cameras are located at various places on the club premises. Images from some of the cameras are recorded and may be used over and above the primary purposes to assist in the safety and security of club members and the public, subject to the Law and the procedures detailed in the *Closed Circuit Television (CCTV) Policy and Procedures* document available on the club website.