

Members Privacy Policy

Who we are

Calne Archers (Club) is an incorporated association run by it's members. It is a not-for-profit organisation with the principal objective to promote and encourage participation in the sport of Archery.

The Club is affiliated to Archery GB (the trading name of the Grand National Archery Society) and The Grand Western Archery Society.

Archery GB is the national governing body for archery in Great Britain. Archery GB is responsible for all levels of archery within the UK from elite to development level. Archery GB is the Umbrella organisation for English Archery Federation, Archery Northern Ireland, Scottish Archery and Welsh Archery Association.

We are committed to protecting the privacy and security of your personal information. This privacy policy describes how we collect and use personal information about you during and after your time as a member of the Club in accordance with UK data protection laws.

Calne Archers is the Data Controller for the purpose of the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and any successor legislation to the GDPR or the Data Protection Act 1998. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy policy.

It is important that you read this policy, together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

1. Data protection principles

- 1.1 We will comply with data protection law. This says that the personal information we hold about you must be:
 - 1.1.1 Used lawfully, fairly and in a transparent way.

- 1.1.2 Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 1.1.3 Relevant to the purposes we have told you about and limited only to those purposes.
- 1.1.4 Accurate and kept up to date.
- 1.1.5 Kept only as long as necessary for the purposes we have told you about.
- 1.1.6 Kept securely.

2. The kind of information we hold about you

- 2.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 2.2 There are "Special Categories" of more sensitive personal data which require a higher level of protection, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships, genetic and biometric data, data concerning health and data concerning a person's sex life or sexual orientation.
- 2.3 We may collect, store, and use the following categories of personal information about you:
 - 2.3.1 Personal contact details such as name, title, postal address, telephone number, and personal email address;
 - 2.3.2 Date of birth;
 - 2.3.3 Photographs;
 - 2.3.4 Your archery scoring history, associated classifications and bow style
 - 2.3.5 Your ArcheryGB membership number
 - 2.3.6 Emergency contact details
- 2.4 We may also collect, store and use the following "special categories" of more sensitive personal information:
 - 2.4.1 Information about your health, including any medical condition, injury, health records relevant to your ability to participate in archery.

2.4.2 Where applicable and necessary DBS checks containing information about criminal convictions and offences.

3. How is your personal information collected?

- 3.1 We collect personal information about our members via the membership application form, entries to competitions hosted and administered by the Club, and scores submitted for club records or award schemes. We also collect personal data from participants on courses and "taster" sessions. We may collect additional personal information during member-related activities throughout the period of your membership. If your medical or health information is required then we will contact you directly in respect of this.
- 3.2 We may also receive personal information about our members from third parties that we work with, including but not limited to The Grand National Archery Society which trades as Archery GB and the Grand Western Archery Society.

4. How we will use information about you

- 4.1 We will only use your personal information when the law allows us to.

 Most commonly, we will use your personal information in the following circumstances:
 - 4.1.1 Where we need to perform the contract we have entered into with you, namely to provide membership services to you.
 - 4.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
 - 4.1.3 Where you have given your consent.
- 4.2 In addition to the above, we may also use your personal information where it is necessary for compliance with a legal obligation or in order to protect your vital interests (or someone else's vital interests).
- 4.3 We need all the categories of information listed in clause 2.3 above primarily to allow us to perform our contract with you to deliver membership services. We may also use your personal information for our legitimate interests, namely the proper and efficient administration of the Club, provided your interests and fundamental rights do not override

those interests. The situations in which we will process your personal information are listed below:

- Registration and validation of your membership.
- Providing the membership benefits to you, including but not limited to:
 - Access to shooting facilities; and
 - Instruction or coaching from qualified instructors and coaches;
- Organisation management and planning, including accounting and auditing.
- Discussing and obtaining grants and sponsorship on behalf of the membership.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems.
- To provide you with relevant news and updates in relation to membership services.
- To provide you with information on our third-party providers.
- 4.4 If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing you with certain membership benefits).
- 4.5 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 4.6 We will always treat your personal information with respect and never sell or share it with other organisations for marketing purposes.

5. How we use particularly sensitive personal information

5.1 We need to have further justification for collecting, storing and using Special Categories of personal information. We may process Special Categories of personal information in the following circumstances:

- 5.1.1 In limited circumstances, with your explicit written consent.
- 5.1.2 Where it is necessary for establishing, exercising or defending legal claims.
- 5.2 Less commonly, we may process this type of information where it is to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.
- 5.3 We will use your particularly sensitive personal information in the following ways:
 - 5.3.1 We will use information about your physical or mental health to assist with making any reasonable adjustments required to enable you to enjoy the benefits of membership.
 - 5.3.2 We will use information about any criminal convictions and offences where required by law in connection with any Club instructor or coach or committee member who interacts with children through their role in the Club.

6. Information about criminal convictions

- 6.1 We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.
- 6.2 Checks regarding criminal convictions will be performed by Archery GB through the Disclosure and Barring Service and the information will be provided to the Club Secretary.
- 6.3 We will use information about criminal convictions and offences in order to ensure that any Club instructor, coach or committee member who interacts with children through their role in the Club is not barred or restricted in having
- 6.4 contact with children.
- 6.5 We are allowed to use your personal information in this way to carry out our obligations under Child Protection legislation. The processing will be in accordance with our data protection policy.

7. Under 18s

7.1 If you are under 18 and would like to get involved, please ensure that you have consent from a parent or guardian before giving us your personal information. When we collect data about a child or young person aged under 18 we will make it very clear as to the reasons for collecting this data and how it will be used.

8. Data sharing

- 8.1 We may have to share your data with third parties, including third-party service providers and contractors. We require third parties to respect the security of your data and to treat it in accordance with the law.
- 8.2 We will share your personal information with third parties where required by law, where it is necessary to administer the membership relationship with you or where we have another legitimate interest in doing so.
- 8.3 Third parties with whom we share your personal information include organisations such as The Grand National Archery Society which trades as Archery GB and the Grand Western Archery Society for the purpose of providing you with membership benefits.
- 8.4 "Third parties" also includes third-party service providers and other entities. The following activities are carried out by third-party service providers: insurance provision, membership benefits provision and administration, and IT services.
- 8.5 All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. Where our third-party service providers are processing personal data on our behalf, we do not allow them to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions
- 8.6 We may also need to share your personal information with a regulator or to otherwise comply with the law.

9. Where we store your data

- 9.1 The servers that host our website data (<u>www.calnearchers.org</u>) are based in Denmark though one.com.
- 9.2 The Club also stores your personal data on Google drive and Gmail web based services who store the date outside of the EU. Google is certified

under the EU-U.D. Privacy Shield Framework and guarantee to provide a level of protection in line with EU data protection law in any transfer of personal data from the EU to the rest of the world.

10. Data Security

- 10.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know it. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Club Chairperson if requested in writing.
- 10.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

11. Data Retention

- 11.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our data retention policy which is available from the Club Chairperson.
- 11.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 11.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.
- 11.4 Once you are no longer a member of the Club we will treat your personal information in accordance with our data retention policy.

12. Rights of access, correction, erasure, and restriction

- 12.1 It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership.
- 12.2 Under certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.

- 12.3 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Club Chairperson in writing.
- 12.4 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive.

 Alternatively, we may refuse to comply with the request in such circumstances.
- 12.5 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security

measure to ensure that personal information is not disclosed to any person who has no right to receive it.

13. Right to withdraw consent

13.1 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Club Chairperson in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. If this impacts upon the membership services we provide to you, we will confirm this to you.

14. Responsibility for compliance

14.1 The Club Chairperson is responsible for overseeing our compliance with this privacy policy. If you have any questions about this privacy policy or how we handle your personal information, please contact Matthew Griffiths. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

15. Changes to our privacy policy

15.1 We reserve the right to update this privacy policy at any time, and we will provide you with a new privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Questions, comments and requests regarding this privacy policy should be addressed to Matthew Griffiths

calnearchers@gmail.com Telephone: 07960 308025

Calne Archers

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