

Stock Exchange Rifle Club

General Data Protection Regulations - Privacy Policy

About this policy

This policy explains how we at The Stock Exchange 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 membership applicants, probationary members, visitors and guests.

We will collect, use and store personal data as described in this Privacy Policy, when people apply for membership to the club, or engage in activities at the club.

The Club's website acts solely as an email forwarder; it does not collect, hold or process data. This Privacy Policy relates to other record systems, paper and offline electronic, held by the Club.

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 at London Bridge Range regularly for any amendments. We will only share your personal data with any third parties as outlined below.

The data will be retained under the lawful basis of Legitimate Interests for legal, health and safety reasons. A Legitimate Interest Assessment has been undertaken and can be made available to members on request.

Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.org.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. A Data Control Officer appointed by the Executive Committee 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**

Use and sharing of personal information

Your personal data:

- will be used to notify the Police when you apply to join the club and for any appropriate notifications as required by law.
- will be used for the purposes of organising and operating the club 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.
- may be shared with any National Governing Body or another Home Office Approved Club.
- 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.

Lawful Basis

The appropriate lawful basis upon which SERC rely on for the processing of personal data are:

Contract. This applies where there is a contract (written or implied) between the club and an individual. Membership, competition, event, and course data will be processed on this basis.

Legal Obligation. This applies for processing personal data that is disclosed to the police or other legal requests (e.g. if an incident is recorded on CCTV and is reported to the police.)

Legitimate Interest. This covers the general need for information that the club requires to organise, and promote the activities of the club, maintain its list of contacts, produce activity reports and results which are published on the Club website and other media.

Vital Interest. This covers matters relating to an individual's health and life or death situations. We do not normally collect this type of information. However, if we are provided with this information by an individual we will disclose it to those we consider it as necessary to do so (eg duty officer, range officer, paramedics).

Consent. This is provided for use of other personal data on an ad hoc basis. In each case the consent of the individual will be recorded.

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 their 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

- Club Officers will process membership information electronically and hold all information on a database on a secure computer and in paper format.
- 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 (secretary@serc.org.uk) 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. You are at that time authorising the club to hold such data on file.

The data is kept on file at SERC. The data will be normally be kept for up to 7 years after membership ceases. It may be kept for a longer period for reasons of legal and civil action or other ongoing case management.

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 by venue management in the interests of safety and crime prevention. All images are stored onsite in a Digital Video Recorder which is password protected. The CCTV image feeds are visible to all persons in the Club Room.

- The images/data are stored for approximately 1 month and then these are over written, unless the club has reason to retain the images for legal, safety, health or disciplinary reasons.
- For these reasons the information processed may include visual images, personal appearance and behaviours. This information may be about club members, 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 images e.g. theft/bullying/abuse etc. must therefore be made within 1 month of the incident otherwise the images will have been overwritten.

Stock Exchange Rifle Club

Legitimate interest assessment

Legal requirements

SERC is required to comply with the **Firearm Amendment Act 1988 c.45 Exemptions Section 15 – Firearms clubs** - and to inform relevant authorities such as the Police.

- The club needs to be able to hold and process data such as membership and shooting records. All members, including probationary members, visitors and guests, benefit from the existence of the club as it allows them to pursue their hobby, enter competitions and enjoy the membership, tuition and social aspects of shooting.
- The club promotes safe and accurate shooting practices and, in so doing, promotes the sport to Olympic standards which benefits the wider public interest both in terms of compliance with all relevant best practice and legal requirements and in promotion of Great Britain/UK regionally and internationally.
- SERC wishes to be fully accessible and inclusive and so has installed lifts and ramps.
- By processing data we are able to comply with all relevant legislation, share data with relevant authorities and the National Governing Body (NRA or NSRA) or other Home Office Approved Clubs and also allow members to use a shared but externally private social platform.
- Basic data is required by law, shooting records are also required for competitions and members are free to choose whether or not to engage in the private social communications.

Impact

- Our relationship with members, visitors and guests is contractual (whether in writing or by conduct) and we are required to comply with the law whilst taking all reasonable steps to ensure safe shooting practices.
- We are happy to reassure those enquiring about membership, visitors and existing members about the need for each element of data so that they understand and opt to decline to visit or become a member.
- Where a child is permitted to join the club, the parent or guardian is required to sign a Parental Agreement.

The Lawful reasons for processing your data:

Contract. This applies where there is a contract (written or implied) between the club and an individual. Membership, competition, event, and course data will be processed on this basis.

Legal Obligation. This applies for processing personal data that is disclosed to the police or other legal requests (e.g. if an incident is recorded on CCTV and is reported to the police.)

Legitimate Interest. This covers the general need for information that the club requires to organise and promote the activities of the club, maintain its list of contacts, produce activity reports and results which are published on the Club noticeboard, website and other media.

Vital Interest. This covers matters relating to an individual's health and life or death situations. We do not normally collect this type of information. However, if we are provided with this information by an individual we will disclose it to those we consider it as necessary to do so (e.g. duty officer, range officer, paramedics).

Consent. This is provided for use of other personal data on an ad hoc basis. In each case the consent of the individual will be recorded.

The tables below give further explanation of which lawful reason applies to which data, why we collect it and with whom we may be required to share it. The club will make every reasonable 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.
- Maintain a register of attendance of all members with details of the firearm used where the member has an FAC.
- 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 Full member.

Type of information	Purpose	Shared with
Members, probationary members and shooting guests 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		

Please note: Data processed for compliance with the Firearm Amendment Act 1988 must be kept for a minimum of 6 years from the end of your membership and is therefore exempt from 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 addresses	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/left-right handedness/height	Provision of adequate facilities for members	
FAC details	Duty of care to ensure firearms are being used lawfully on club premises	
References	To check the applicants suitability for membership	
Disabilities	Provision of adequate facilities for members.	
Bank and payment details	Managing the Member's membership of the club	Club officers
Emergency contact details	Contacting next of kin in the event of emergency	Emergency services
Member's photograph	Included on Membership card and membership records	Committee and Range Officer
Qualifications	RCO, Instructor and Coaching qualifications for quality assurance purposes.	Members and probationary members
Competency	For accreditation and issue of competency cards	

Please note data processed for compliance with insurance purposes may 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	National Governing Bodies (NGBs) and other shooting organisations
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.	
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	Members' newsletter distribution	Members' newsletter publishers