



## Storfford Archery Club

### PRIVACY NOTICE FOR OUR MEMBERS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you have applied to become or are a member of our club. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we**, **our** or **us** in this privacy notice are to the Storfford Archery Club ("SAC"), Archery GB Club Number 368.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Data Protection Compliance Manager has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

#### 1. **PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- references and other information included in a cover letter or as part of the application process for membership;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- records of your attendance at any events hosted by us;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you.
- details of any county membership;
- details of any Archery GB ("AGB") membership.
- details of emergency contacts;

- records and assessment of any classifications, archery handicaps, competition results, details regarding events, tournaments or matches attended and performance (including that published by a third party);
- any disciplinary and grievance information.

## 2. **SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your health, including any medical condition and health care professional;

In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in social protection law; or
- we have your explicit consent.

In the table below’ we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information about you, including DBS investigations. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

## 3. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members when you apply to become a member of the club, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you from any third party references you provide as part of the application process for membership. E.g. from a previous archery club.

If you are providing us with details of emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

We may also collect information about you from AGB, Southern Counties Archery Society (“SCAS”), Herts Archery Association (“HAA”) other archery clubs or tournament organisers.

#### 4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b>To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you</b>	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To arrange and manage any contracts for the provision of any services or products</b>	Contact details, transaction and payment information.  Records of your interactions with us.	This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have purchased from us.
<b>To send you information which is included within your membership benefits package, including details about advanced ticket information, competitions and events, partner offers and discounts and any updates on the sport of archery</b>	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To send you other marketing information we think you might find useful or which you have requested from us.</b>	Contact details and marketing preferences.	Where you have given us your explicit consent to do so.
<b>To share your information with our governing body and other affiliated organisations.</b>	Contact details and marketing preferences.	We have a legitimate interest in providing your contact details and marketing preferences included in your membership package with Archery affiliated organisations.

<b>To communicate with you including our newsletters, information about membership, last minute venue updates, and events.</b>	Contact details	We have a legitimate interest in providing you with communication that is included in your membership package.
<b>To answer your queries or complaints</b>	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
<b>Retention of records</b>	All the personal information we collect.	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our club and in some cases, we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<b>To conduct data analytics studies to better understand club and attendance and trends within the sport</b>	Records of your attendance at the club any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
<b>For the purposes of promoting the club, our events and membership packages.</b>	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.

<p><b>To comply with health and safety requirements</b></p>	<p>Records of attendance and medical information about your health</p>	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in Archery.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p><b>To administer your attendance at any courses or programmes you sign up to</b></p>	<p>All contact and membership details, Transaction and payment data.</p> <p>Details of any archery body membership and performance data.</p>	<p>This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or programme.</p>
<p><b>To arrange for entry into any internal or external event or competition.</b></p>	<p>Contact Information Age (Juniors only)</p>	<p>This is necessary to enable us to make the necessary arrangements for entering you into an event.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>

<p><b>To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.</b></p>	<p>Health and medical information</p>	<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p><b>To gather evidence for possible grievance or disciplinary hearings</b></p>	<p>All the personal information we collect</p>	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p><b>For the purposes of equal opportunities monitoring</b></p>	<p>Name, title, date of birth, gender, health and medical information</p>	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>

<p><b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b></p>	<p>Information about your criminal convictions and offences.</p>	<p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p> <p>Please see the club's Safeguarding policy.</p>
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**Personal information:** you will have a legal, contractual or other requirement or obligation to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

5. **DIRECT MARKETING**

**Email, post and SMS marketing:** from time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by contacting us by using the details set out in the "Contacting us" section below. You can also unsubscribe from our marketing by unsubscribing in the manner indicated in the marketing messages we send to you.

This does not include the Newsletter, regular email updates from the secretary or SMS Text alerts. This communication is considered part of your membership package and therefore to opt out would preclude you from being a member of the club.

## 6. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you.**
- **To any governing bodies or regional bodies for the sports covered by our club:** to allow them to properly administer the sports on a local, regional and national level.
- **Other service providers:** for example, payment processors.
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

## 7. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect is not transferred to any other organisation other than Archery GB, Hertfordshire Archery Association and Southern Counties Archery Society. It is never transmitted outside the UK by Stortford Archery Club.

## 8. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

As suggested by legal counsel, our aim is to keep records for 24 years which covers potential claim periods, including sexual misconduct claims; however this is an aim of the club and the club does not guarantee that records will be complete or accurate or held for the entire period stated and members are recommended to keep their own notes and records. Certain other records may be kept up to this date or for shorter periods at the club's discretion. Personal Records may be destroyed prior to the 24 year period at the discretion of the Club and without prior notice to Members. Club Records shot will be kept indefinitely or until broken.

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period of 1 year after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months;
  - Details of individuals who attend our Beginners courses but do not join where we hold records for a period of not more than 12 months;



- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can contact us by using the details set out in the "**Contacting us**" section below.

## 9. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

10. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

11. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [GDPR@stortfordarchers.org.uk](mailto:GDPR@stortfordarchers.org.uk) write to the club Data Protection Manager at 24 Rhodes Avenue, Bishop's Stortford, Herts, CM23 3JL stating it is a GDPR related inquiry.

Should you have any other inquiry or wish to update your contact information please contact the [secretary@stortfordarchers.org.uk](mailto:secretary@stortfordarchers.org.uk) or write to the address above.

**Version dated 3<sup>rd</sup> September 2019**

**STORTFORD ARCHERY CLUB**  
**Register of Systems, Processes and Data**

The Club records will be maintained for the appropriate period as determined by the Committee at its entire discretion, and in accordance with advice received from Archery GB and professional advice. Records will be used for administrative, and regulatory purposes and may be seen upon request by any Committee Member and the Club reserves the right to provide these to third parties as is reasonable so to do. Current records, such as (but not exclusively) shooting records, current members, attendees on beginners' courses may be viewed by any person involved in the relevant event, Archery GB, and used for administrative purposes and may be provided upon reasonable request to any person either in whole or in part. Determination of whether a request is reasonable and the extent of disclosure will be by majority vote of the Club Committee and, subject to court order to the contrary, that decision will be final. In some cases, records of recent events may be retained in public display pending removal to club archives. Individuals shown as "Individuals Given Access" are indicative only of those regularly provided access to the data and the Committee may, at its entire discretion, delegate any person to have access to any Club data for club administrative purposes or risk management.

<b>Systems and Processes</b>	<b>Data</b>	<b>Legitimate Purpose</b>	<b>Data Controller</b>	<b>Individuals Given Access</b>
<b>Beginners' courses</b>	Name Email address Date of birth/Age Address Telephone Number Shirt Size	Beginners' Course administration Delegate lists	Course Organiser	Course Organiser Coaching Team
<b>Current Members</b>	Name Sex Date of birth/age (Under 25 only) Address Email address Phone number Archery GB number Emergency Contact Joining month and year	Archery GB joiner administration Bow hire Membership renewal Member communication In the event of accident or incident	Data Protection Compliance Manager	Chair Secretary Treasurer Junior Rep Competition Organiser

<b>Past Members</b>	Name Sex Date of birth/age (Under 25 Only) Address Email address Phone number Archery GB number Joining month and year Date of leaving	In the event of rejoining data is kept for 12 months	Data Protection Compliance Manager	Treasurer
<b>Affiliated Organisations</b>	Archery GB HAA Membership SCAS Membership	Archery GB League organisers Competition organisers	Data Protection Compliance Manager	Secretary Treasurer
<b>Shooting Records</b>	Name Archer's Shooting records Classification Records Held	Archers' shooting records Classifications Club record holders Handicap calculation	Data Protection Compliance Manager	Records Officer
<b>Child Protection – Juniors' Responsible Adult Scheme</b>	Archer's name Emergency Contact Info Health Information Responsible Adult Name	RA agreements; parent/guardian agreements/cards carried by juniors and responsible adults	Junior Rep Junior	Junior Rep Responsible Adult when responsible for the Junior
<b>Indoor / outdoor Shooting Register</b>	Field captain name Club archers' names Signature Visiting archers: names, ARCHERY GB numbers (visitors only) Other visitors: names Responsible adults Accident information Incident information	SAC Shooting Register Attendance Log Attendance statistics Witnesses to accidents/incidents Child Protection Responsible Adult Record Visitor photographic permissions Visitor Log	Data Protection Compliance Manager	Chair Secretary Treasurer Any member of the club when in paper format in the container

<b>League Matches</b>	Name Age (Juniors Only)	Shooting register Target lists	Data Protection Compliance Manager	Leagues Organiser Competition Organiser
<b>Internal Competitions</b>	Name Age (Juniors Only)	Shooting register Target List List who holds which Trophy	Data Protection Compliance Manager	Competition Organiser
<b>External Competitions organised at the Club</b>	Name Age (Juniors Only) Email Telephone Number Home Address Club Name Archery GB	Shooting register Target List List who holds which Trophy	Data Protection Compliance Manager	Competition Organiser
<b>Coaching</b>	No Data Kept			
<b>Banking</b>	Name Sort Code Account Number Paypal email address	Stored in HSBC online portal only for reimbursement of expenses to members of the club Paypal email stored as contact detail only when payment has had to be made	Data Protection Compliance Manager	Treasurer
<b>Key Holder Register</b>	Name Signature	Record of key holders to the club container	Data Protection Compliance Manager	Secretary

### Data Storage – Security and Back-up

Storage	Access	Protection of data and access
<b>USB Stick</b>	Master personal data – Data Protection Compliance Manager	Secure USB Stick (encrypted) Backed up to Google drive when updated. Leavers data deleted annually on renewal data.
<b>Google Drive</b>	Contact lists Names and email addresses – Chair, Secretary, Names and email addresses and Junior Ages – Junior Rep, Records Officer	Password protected file Restricted access to folders and files
<b>Paper</b>	Indoor / Outdoor Shooting Log – open access, name only. Target Lists – league and competition organisers and participating archers Score sheets (Juniors Age Only) Key Holder Register	No sensitive data  Recorded on Records System and then destroyed or, if requested, returned to archer.
<b>Shooting Records System</b>	Records Officer and deputy	On one Laptop, Golden Records system back up to USB Stick

Version dated 3<sup>rd</sup> September 2019