

Bath Archers

General Data Protection Regulations

Compliance Document

Date: 9th August 2018

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Approval: Signed: _____

For the Committee, Bath Archers

Date: _____

Purpose

This document describes how Bath Archers (the club) will comply with the General Data Protection Regulations (GDPR) which came into force on 25th May 2018. It describes the principles applied and the processes adopted.

'Personal data' may include data from members and clients of the club.

'Client' is an individual temporarily associated with the club through lessons, tournaments or other events.

The club will hold general contact information on suppliers and organising bodies, however this is not considered personal data and is held only to enable transactions.

GDPR Principles

The club will comply with the principles of data protection (the Principles) enumerated in the EU General Data Protection Regulation. These principles are:

Lawful, fair and transparent

Data collection must be fair, for a legal purpose and we must be open and transparent about how the data will be used.

Limited for its purpose

Data can only be collected for a specific purpose.

Data minimisation

Any data collected must be necessary and not excessive for its purpose.

Accurate

The data we hold must be accurate and kept up to date.

Retention

We cannot store data longer than necessary.

Integrity and confidentiality

The data we hold must be kept safe and secure.

Lawful basis for processing data

The club will process personal data when:

- We hold recent, clear, explicit, and defined consent for the individual's data to be processed for a specific purpose.
- Processing the data is necessary to protect a person's life or in a medical situation.
- The processing is necessary for our legitimate interests. This condition does not apply if there is a good reason to protect the individual's personal data which overrides the legitimate interest.

Special categories of personal data

This means data about an individual which is more sensitive, so requires more protection.

In this category the only personal data that the club may collect concerns the health of the individual, specifically where health issues could affect the safety of the individual or require additional facilities or assistance.

Individual's Rights

Individuals have rights to their data which we must respect and comply with to the best of our ability. We must ensure individuals can exercise their rights in the following ways:

Right to be informed

Providing privacy notices which are concise, transparent, intelligible and easily accessible.

Keeping a record of how we use personal data to demonstrate compliance with the need for accountability and transparency.

Right of access

Enabling individuals to access their personal data and supplementary information

Allowing individuals to be aware of and verify the lawfulness of the processing activities

Right to rectification

We must rectify or amend the personal data of the individual if requested because it is inaccurate or incomplete.

This must be done without delay, and no later than one month. This can be extended to two months with permission from the DPO.

Right to erasure

We must delete or remove an individual's data if requested and there is no compelling reason for its continued processing.

Right to restrict processing

We must comply with any request to restrict, block, or otherwise suppress the processing of personal data.

We are permitted to store personal data if it has been restricted, but not process it further. We must retain enough data to ensure the right to restriction is respected in the future.

Right to data portability

We must provide individuals with their data so that they can reuse it for their own purposes or across different services.

We must provide it in a commonly used, machine-readable format, and send it directly to another controller if requested.

Right to object

We must respect the right of an individual to object to data processing based on legitimate interest or the performance of a public interest task.

Breach of GDPR Policy

Any breach of this policy or of data protection laws must be reported as soon as we become aware of a breach. The club has a legal obligation to report any data breaches to the relevant authority within 72 hours.

GDPR in Bath Archers – Principles and Procedures

Membership Data Ownership

1. The Membership Secretary will be the single owner for all personal membership data held by the club.
2. There will be a single repository for personal membership data, held by the Membership Secretary.
3. Subsets of the membership data will be made available by the Membership Secretary to those members of the club who require it to be able to perform their duties. This may include the treasurer, records officer, webmaster and tournament secretaries. The smallest possible data subset will be provided which allows that role to be fulfilled.
4. Authorisation to hold and use personal membership data will be at the sole discretion of the club committee.
5. Where personal membership data is required by bodies administering the sport of archery (e.g. counties, regions, ArcheryGB), the membership secretary is permitted to provide such information as required, so long as the administering body confirms that it also has a GDPR policy in place.

Client Data Ownership

Throughout the year the club will hold events in support of the sport of archery including, but not limited to, tournaments, taster session and have-a-go events.

6. There will be a nominated owner for all personal client data held by the club. This will be the person authorised by the committee to organise the event.
7. Where client data is required by bodies administering the sport of archery (e.g. counties, regions, ArcheryGB), the authorised person is permitted to provide such information as required, so long as the administering body confirms that it also has a GDPR policy in place.

Data Gathering

8. The club will gather only such data as is required to operate and administer the club and events it organises, and to support the bodies administering the sport.
9. All emails, forms etc. requesting personal information facilitating membership of the club or admission to a club organised event will contain a privacy notice concerning the use of personal data by the club.
10. If disclosure to another recipient is envisaged, then the privacy notice must be supplied prior to the data being disclosed.
11. The privacy notice must be concise, transparent, intelligible and easily accessible.
12. The following information must be included in a privacy notice to all data subjects:
 - a. Identification and contact information of the data administrator
 - b. The purpose of processing the data and the lawful basis for doing so
 - c. The legitimate interests of the controller or third party
 - d. The right to withdraw consent at any time
 - e. Any recipient or categories of recipients of the personal data
 - f. The retention period of the data or the criteria used to determine the retention period, including details for the data disposal after the retention period
 - g. The right to lodge a complaint with the club
 - h. Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences for any failure to provide the data (only for data obtained directly from the data subject)

Data Use

Personal data (membership or client):

13. Will not be used to market goods or services to members or clients (however see 18 and 19).
14. Will not be provided to others to market goods or services to members or clients.
15. The use of data provided to bodies administering the sport will be governed by the GDPR policies of those bodies.
16. Data concerning the organisation of and results from tournaments organised by the club may be made available on-line and distributed by other means, however this data will be limited to Name, Club, target allocation and results.
17. The name, address and other contact details of some club officials will need to be publicised in the performance of their duties. Where possible and appropriate this will be anonymised (for example by the use of forwarding email addresses).
18. Where the club is receiving sponsorship from outside bodies, e.g. suppliers, the logo and contact information from the sponsors may be included in documentation sent to club members and clients.
19. Where a client has an established relationship with the club (e.g. have attended a club tournament in the last 3 years), the client's data may be used to solicit entries to forthcoming events.

Data Security, Storage and Retention

Personal data (membership or client):

20. Will be held securely by the authorised person.
21. Will not be made available to any person or organisation, other than as described in 5 and 7.
22. Will be securely stored on-line or locally.
23. Data stored on a computer or on-line will be protected by strong passwords that are changed regularly.
24. Computers used to store data must be protected by:
 - a. Ensuring that the operating system and applications are kept up to date.
 - b. Up to date security software (e.g. Norton Security).
25. Membership and client data will be securely archived (made unavailable for general use) when unused for 3 years, and deleted after a maximum of 7 years, however see 31.
26. Data stored on CDs or memory sticks will be encrypted or password protected and locked away securely when they are not being used.
27. Data should be regularly backed up.
28. Data should never be saved to mobile devices such as tablets or smartphones.
29. Paper records containing personal data will be kept in a secure place and will be securely destroyed when no longer required or within 3 years of submission.
30. When requested to do so by the individual concerned, the personal data held by the club concerning that individual will be made available and may be challenged, deleted or its use restricted as required.
31. A limited set of information (name, club and results) from tournaments and general shooting will be retained in perpetuity as part of the club records.

Bath Archers

Membership Privacy Notice

General Data Protection Regulation Act, May 2018.

[What information do we collect about you?](#)

We collect information about you when you complete, or have already completed, the Membership Application Form.

[How will we use the information about you?](#)

We may need to pass the information about you to bodies administering the sport, (counties, regions, ArcheryGB). We will not disclose any information about you to any organisation unless we are required to do so by law.

[Marketing](#)

On occasion we would like to keep you up to date with news about the club and events. If you consent to receive this information you may opt out at any time in the future.

[Access to your information and correction](#)

You have the right to request a copy of the information that we hold about you. We want to make sure that your personal information is accurate and up to date. This information will be reviewed annually and you may request us to correct or remove any information you think is inaccurate.

[Retention of data](#)

Once you are no longer involved with the club we will securely retain your data for 3 years.

[How to contact us](#)

If you have any questions about our privacy policy or information we hold about you, please contact us at via membership@batharchers.org.

Submission of the membership form confirms your acceptance of this Privacy Notice.

Bath Archers

Tournament Privacy Notice

General Data Protection Regulation Act, May 2018.

What information do we collect about you?

We collect information about you when you complete, or have already completed, the Tournament Application Form.

How will we use the information about you?

We may need to pass the information about you to bodies administering the sport, (counties, regions, ArcheryGB). We will not disclose any information about you to any organisation unless we are required to do so by law.

Marketing

On occasion we would like to keep you up to date with news about the club and events. If you do not wish to receive this information, please indicate this on the form. You may opt out at any time in the future.

Access to your information and correction

You have the right to request a copy of the information that we hold about you. We want to make sure that your personal information is accurate and up to date. You may request us to correct or remove any information you think is inaccurate.

Retention of data

Once you have attended the tournament we will securely retain your data for a maximum of 3 years.

How to contact us

If you have any questions about our privacy policy or information we hold about you, please contact the tournament organiser.

Submission of the entry form confirms your acceptance of this Privacy Notice.