

24.09.2018

OXFORD UNIVERSITY PISTOL CLUB PRIVACY POLICY

ABOUT THIS POLICY

This policy explains when and why we (Oxford University Pistol 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 will be notified by email if you are a current member of the club and you will be able to find the current policy on our website. 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).

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. The Secretary 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.

MEMBERS 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 Secretary.

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, competition entries/results and other important notices etc. Your name/address and email address may be shared with our current National Governing Bodies (NSRA and NRA) or with the Oxford Rifle Association. Your name, OSS number, relationship with the University of Oxford or Oxford Brookes University and college will be shared with Oxford University Sports Federation and Oxford University Sport. 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.

In addition, any personal data contained within the minutes of any committee or general meeting of the club will be retained indefinitely. This data is processed under the lawful basis of Legitimate Interest as they form a record of the governance of the club.

THE LAWFUL REASONS FOR PROCESSING YOUR DATA

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

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

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
- Inform the Police of any person other than an associate member who has ceased to be a member for whatever reason

- Inform the Police of any person other than a guest or associate member who has not shot with 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.	To meet our legal obligations	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 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 YOUR MEMBERSHIP

Type of information	Purpose	Shared with
Member's, probationary members and associate members address, telephone numbers, e-mail address	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.	
FAC details	Duty of care to ensure firearms are being used lawfully on club premises	
Section 21 declaration	Ensuring individual compliance with legislation	
Personal Sponsor and their	To check the applicants	

contact details	suitability for membership.	
Emergency contact details.	Contacting next of kin in the event of emergency.	Emergency services
Member's photograph	Included in membership records	

DATA PROCESSED WITH YOUR CONSENT

Type of information	Purpose	Shared with
Member's, probationary members and associate members: address, telephone numbers, e-mail address, OSS number, relationship with the University of Oxford or Oxford Brookes University, college, degree course and end date	Managing the Member's membership of the Club.	<p>NGBs and other shooting organisations e.g. British Shooting, County Associations etc.</p> <p>Oxford University Sports Federation and Oxford University Sport</p>
Date of birth / age related information.	Managing membership categories which are age related. Age related competition opportunities	
Gender.	<p>Gender related competition opportunities</p> <p>For the purposes of Reporting gender data.</p>	
Disabilities	<p>Provision of adequate facilities for members.</p> <p>Providing competitive and other opportunities.</p>	
Scores	<p>For performance measures related to competition and selection.</p> <p>For media publicity of events</p>	
Photos and videos of members and their firearms	Putting on the Club's website and social media pages and using in press releases.	
Member's name, e-mail address	Newsletter distribution	

The club may be asked to share personal information we process about an individual and the name, address and email address with an appropriate National Governing Body (NGB). These include NSRA and NRA.

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.

FRESHER'S FAIR

The names and email addresses of those who provide them at Fresher's fair will be kept for up to a year. Any one who gives provides us with this information gives us their consent for us to process this data for the purposes stated below. This information will be used to provide information about how to join the club and other activities that may be of interest (for instance Cuppers). This information will not be shared outside the club's committee and university mailing list system.

CUPPERS

The names, email addresses and colleges of those who sign up for cuppers will be kept for up to a year. Any one who gives provides us with this information gives us their consent for us to process this data as outlined below. In addition during the competition scores will be recorded. This information will be used to administer the competition and to inform Oxford University Sports Federation of the college of the winner. This information will not be shared outside the club's committee and university mailing list system.

ALUMNI

The club will retain contact details (Name, Address, email and/or phone numbers) for alumni of the club. This information may be used to give alumni and update on the activities of the club or to invite them to annual dinner. In addition, a record may be kept of any committee position held while a member of the club. Consent to hold this information indefinitely is to be acquired when a member of the club leaves the university.

HOW WE PROTECT YOUR PERSONAL DATA

The Data Controller will process membership information electronically and hold all information on Google Drive with a copy on their personal computer. Paper copies of data will be held at the residence of the data controller. If it is necessary to transport data it will be kept secure.

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 DATA

If you wish to know what personal data the club holds please email the Secretary at secretary@oupc.co.uk and they will respond within 14 days of the request.

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 and you are at that time authorising the club to hold such data on file.

The data are kept on file at the data controllers residence and stored electronically on Google Drive. The data will be normally be kept for up to 7 years. 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.