

# Privacy Policy

Epping Archers PRIVACY NOTICE

What this privacy notices covers

Epping Archers is committed to protecting your personal information. In this notice, references to 'we' or 'us' means Epping Archers. This notice explains how we collect and use the personal information about you.

**Who we are**

Epping Archers is a club formed with the following stated aims

Objectives of the club

1. As an “open” club, to participate in the sport of Archery and to encourage all levels of

experience and capability to take an active part.

 2. To encourage beginners in the sport of Archery.

3. To promote the development of Archery and to participate in club and inter-club competitions.

 4. To develop fellowship between our members, their families and friends for the benefit of all.

5. To ensure the safety and welfare of both adults and juniors. To help promote a healthy, safe, environment for all, the club has adopted the Archery GB Policy for Safeguarding Children, Young People and Vulnerable Adults, along with their Equity Policy and Code of Conduct.

Affiliation

Epping Archers is registered with Archery GB, the Essex County Archery Association (ECAA) and Southern Counties Archery Society (SCAS). NB. The ECAA is also known as the Essex and Suffolk County Archery association.

Governance

The club is unincorporated.

Epping Archers operates the website www.eppingarchers.org.uk .

Epping Archers collects data under the data protection rules and our Data Controller is the club secretary. In addition, the club also operates as a data processor.

**Lawful Basis for Processing**

We only collect and process such information as is necessary for the running of the club.

GDPR Article 6(1)(b) gives a lawful basis for processing data where:

“processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”

In this context, by charging members to take part in a beginner’s course and/or join the club, we are entering into a contract with the individual to provide archery services (e.g. Venues) and to facilitate archery taking into account a member’s health and/or disability. This includes providing the required data to Archery GB, our national governing body, for the purposes of regulation and insurance.”

**Information we gather**.

Epping Archers gathers certain information about you. Such information may also be used by our affiliated entities, namely Archery GB (Our National Governing Body), county and regional associations.

We collect information in the following ways:

**Information you give us.**

When you become a member of Epping Archers you will give us information. Information may include your name, date of birth, postal address, email address, phone number, a personal description, disability, ethnicity, your archery qualifications, award history or CRB / DBS / PVG checks that have been undertaken.

When you enter competitions the following information may be collected and shared with tournament organizers, scoring systems and results may be published: First Name, Surname, Gender, Bow style, Date of Birth / Age category, Email, Address, Phone number, Club (and ID), County (and ID), Region (and ID), Round (unless defined by age), Disabled (Y/N), Disability info.

**Juniors**

For those under the age of 18, we require the membership form to be completed by a parent/carer and that the address provided, including the email address, is that of the parent/carer. The club has a policy of not communicating directly with a junior by email. If for any reason the parent/carer is willing for the club to hold the email address of a young person and wishes for the club to communicate directly with the said young person, then the club requires written authorization from the parent/carer to that effect.

**We will use the information you give us to: -**

perform services you have requested (such as providing you with Membership Benefits or providing you with information you have asked for);

administer the sport of Archery, for instance by organising tournaments;

provide you with information about other goods and services that we offer that are similar to those that you have already purchased or enquired about;

notify you about changes to our service, including but not limited to any changes to the Member Benefits;

any other reasonable purposes of Epping Archers, acting always in accordance with the data protection law (as amended from time to time).

**Information Sharing and Disclosure**

We may share your information with the following Associate Bodies

Archery GB. We are affiliated to Archery GB as our National Governing Body which, in addition to running and governing the sport, provides our public liability and other insurance.

Essex County, Southern Region and local Clubs in order that they may communicate with you regarding archery events only or to allow the associate bodies to manage the running of the sport in their areas.

Where members have agreed to email communications covering club business such as the club Newsletter etc. every effort will be made to ensure that group emails avoid other members having access to your email address.

**We may disclose your personal information to third parties:** -

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply other agreements; or o protect the rights, property, or safety of Epping Archers, our Members, or others.

We may disclose your personal information to third parties if we are under a duty to disclose your personal data in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

**Keeping your records**

We keep records only for as long as required to operate in accordance with legal requirements and tax and accounting rules. Coaching records are destroyed 6 months after a member has left unless other legal requirements require otherwise (e.g. accusations of abuse)

Other personal data (names, addresses etc.) are destroyed after 6 years. This is in line with HMRC requirements for our accounts.

**Keeping your records (Juniors)**

For juniors we are additionally guided by “CPSU Briefings. Child protection records retention and storage (England and Wales) “

This states that where no legal requirement to retain information beyond the closure of the record exists, the club needs to establish its own retention periods. Normally personal information should not be held for longer than 6 years after the subject’s last contact with the authority. Exceptions to the 6 year period will occur when records:

1 Need to be retained because the information in them is relevant to legal action that has been started.

2 Are required to be kept longer by law.

3 Are archived for historical purposes (e.g. where the organisation was party to legal proceedings or involved in proceedings brought by a local authority). Where there are legal proceedings it is best to seek legal advice about the retention period of your records.

4 Consist of a sample of records maintained for the purposes of research.

5 Relate to individuals and providers of services who have, or whose staff, have been judged unsatisfactory.

6 Are held in order to provide, for the subject, aspects of his/her personal history (e.g. where the child might seek access to the file at a later date and the information would not be available elsewhere).”

In general, where records are being kept for more than the 6-year period, the files are clearly marked and the reasons for the extension period clearly identified.

**Where we may store your information**

The data that we collect from you will be transferred to, and stored by the Club Secretary and the Membership Secretary and online systems.

By submitting your personal data, you agree to this transfer, storing or processing.

Epping Archers will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

Where we have given you a password which enables you to access certain information, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

**Your rights**

You have the right to:

Have any inaccuracies in your data corrected.

If you would like to update the details we hold about you other than online, please contact our Data Protection Officer.

Request that we delete your personal data.

Object to profiling. Profiling is any automated processing of personal data to evaluate any feature of your behavior, preference or location, including online tracking and behavioral advertising. (N. B. Epping Archers does not carry out profiling)

Request that we do not process your personal data for marketing purposes.

(NB. Epping Archers does not process your personal data for marketing purposes).

You have a right to request a copy of the personal information we hold about you. We require you to prove your identity with two pieces of approved identification. Please address requests to the Data Protection Officer and we will respond within one month, of receipt of your written request and confirmed ID. Please provide as much information as possible about the nature of your contact with us to help us locate your records. This request is free of charge unless the request is manifestly unfounded or excessive.

**Enquires and Complaints**

The Data Controller is the first point of contact regarding any enquires arising from this Privacy Notice. Where possible, please raise all enquires in writing.

If you are unhappy with our work or something that we have done or failed to do, please inform us in writing. Epping Archers will acknowledge receipt of all complaints and will endeavor to investigate the complaint within 15 working days

All complaints should be sent to the Club Secretary

You may also complain directly to the Information Commissioner's Office if you are concerned with how we are handling your personal information using their online form which can be found here: https://ico.org.uk/concerns/handling/.

**Changes to this Notice**

We may change this Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will contact you directly.

*This Privacy Notice was last updated 28/02/18*