



# Bowmen of the Tors Data Protection Policy

Bowmen of the Tors (the “Club”) is committed to protecting your personal data. We will implement various procedures to ensure that this data is only held for specified reasons, is accurate, stored securely and retained only for as long as is necessary. We will also respect individual’s rights to access, correct and remove their data.

This policy details how the Club collects and uses personal data about members and members of the public enquiring about taster sessions and beginners courses, as required by the Data Protection Act and the General Data Protection Regulations (GDPR).<sup>1</sup>

The Club is a data controller as defined by GDPR. Data protection is the collective responsibility of the Club’s Committee.

## How we gather and use data

The Club gathers certain data about members/beginners which enables us to process applications and maintain membership records both internally and with affiliated organisations and allows us to contact you regarding club matters.

We collect data in the following ways:

1. Application forms for membership of the Club;
2. Beginners courses or Taster sessions at the Club;
3. Undertaking tournaments organised by and held at the Club.
4. Photographs taken during events/club shoots for use on the club website/facebook page/other promotional material.
5. Records of scores for Club Record purposes, postal applications and/or progress awards.

The following describes how and why we process your data by each collection occurrence.

### 1. Application Forms for Membership of the Club

| Data protection principle/criteria            | How applied  |
|---|--|
| Data collected                                | Name, date of birth/age, postal address, email address, phone number, a personal description, and any disability.  |
| How we use individual’s data (Privacy Notice) | To register members with county, regional and national organisation.<br>To be able to contact you from time to time, to manage Club activities, to provide you information about the Club or its activities. |

| Data protection principle/criteria  | How applied  |
|-------------------------------------|--|
| How obtained?                       | Supplied by individual on signed application form.   |
| Shared within Club?                 | <p>Yes, electronic file (spreadsheet) accessible only to members of the committee on a shared one drive account. Accessible by authorised members of the committee: Chairman, Secretary, Treasurer, Records Officer and Webmaster/Compliance Officer.</p> <p>No copies shall be stored locally: the use of flash drives, other portable media devices and attachment to email is prohibited and puts members data at risk.</p> <p>Access to the shared drive will be updated within 2 weeks of a committee change.</p> |
| Shared outside Club?                | Data is shared, <i>on behalf of individuals</i> , with the County, Regional and National bodies as part of the national membership registration process. Each affiliate organisation has its own Data Protection policy, which individuals should access via their websites (see Website 'Membership' page for links).   |
| How stored/where/length of storage? | Paper forms held with Treasurer until next membership renewal or up to 12 months following membership expiry. Electronic data (encrypted electronic storage) is managed by Secretary or Treasurer. Updated upon receipt of new members and following renewal within 1 month.   |

## 2. Beginners courses or Taster sessions at the Club

| Data protection principle/criteria            | How applied  |
|---|--|
| Data collected                                | Name, age (date of birth for juniors), gender, postal address, email address, phone number, physical criteria, and any disability.   |
| How we use individual's data (Privacy Notice) | We use all this data in order to ensure the Club has sufficient resources to provide the training required.  |
| How obtained?                                 | Supplied by individual on signed application form or via email   |
| Shared within Club?                           | Yes, electronic file (spreadsheet) accessible only to members of the committee on a shared one drive account. Accessible by authorised members of the committee: Chairman, Secretary, Treasurer, Records Officer and Webmaster/Compliance Officer. |
| Shared outside Club?                          | No   |
| How stored/where/length of storage?           | Paper forms held with Coaching team. Destroyed within 2 months of completion of course.  |

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|  | Data held for prospective beginners who decide not to take up a place on a beginners course deleted within 2 weeks of start of the course. |
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### 3. Undertaking tournaments organised by and held at the Club.

| Data protection principle/criteria            | How applied  |
|---|--|
| Data collected                                | First Name, Surname, Gender, Bow style, Age category (or age if a junior), Club, County and Round. Contact details will be held if supplied.   |
| How we use individual's data (Privacy Notice) | To assign participants to appropriate archery rounds.<br>To produce and inform participants of the target list.<br>To produce and inform participants of the results.  |
| How obtained?                                 | Supplied by individual on signed application form.   |
| Shared within Club?                           | Yes (except contact details)<br>Target list  |
| Shared outside Club?                          | Yes (except contact details)<br>Target lists may be sent to participants' contact email.<br>Results sent to participants/contact and on Club Website/lanseo  |
| How stored/where/length of storage?           | Paper forms stored with Tournament Organiser up to 12 months following tournament. Electronic contact list (secure one drive account) with Tournament Organiser until next Tournament or a maximum of 24 months.<br>Target list and results deleted after 36 months. |

### 4. Photographs taken during events/club shoots for use on the club website/facebook page/other promotional material.

Occasionally, Club members may wish to take photographs of Club members or members of the public attending Beginner's courses or Taster sessions. Common examples include:

Group photos during shoots for placing on the Website or facebook; occasionally these photographs may be used for promotional purposes outside the club eg local newspapers.

Video recordings may also be made of members for coaching purposes. The file will not be shared with anyone except the individual involved (unless permission granted).

Permission will also be sought from parents or guardians when juniors are present. At any time, permission can be revoked and individuals have the right for any photographic record to be removed/deleted.

For child protection reasons consent to be in a photograph or to have a photo publish may be altered at any point by confirming in writing via club Secretary or Welfare Officer.

## **5. Records of scores for Club Record purposes, postal applications and/or progress awards.**

The Club records officer will keep records of scored rounds for the purposes of updating and maintaining the club records (including handicaps and classifications) and submitting postal applications. In addition, the club will retain information regarding progress awards for junior and new members.

### **Marketing**

We do not conduct or are involved with any marketing, except to occasionally inform Club members of availability of Club clothing.

### **Data Sharing and Disclosure**

We will not disclose personal data to third parties (other than those previously identified) unless 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).

### **Where we may store data**

The data that we collect from you will be transferred to and stored at the Club's secure one drive account. By submitting your personal data, you agree to this transfer, storing or processing.

The Club will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy. Communication and reporting of any data losses will be based on risk to individual.<sup>2</sup>

### **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 the Club Secretary via telephone, email or by letter (at the Registered address).

You have a right to request a copy of the personal data we hold about you. Please address requests to the Club Secretary and we will respond within one month, of receipt of your written request.

1 "Guide to the General Data Protection Regulation (GDPR)", Information Commissioner's Office (ICO) <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

2 Notification of data security breaches to the Information Commissioner's Office (ICO), v2 [https://ico.org.uk/media/for-organisations/documents/1536/breach\\_reporting.pdf](https://ico.org.uk/media/for-organisations/documents/1536/breach_reporting.pdf)