

# British Sporting Rifle Club Privacy Policy

In applying for membership of the British Sporting Rifle Club you agreed to the terms and conditions of membership which include agreement to:

- the Club keeping your membership details on a secure computer system on the understanding that they will not be divulged to outside parties except as required by law or to manage the club.

## Personal Data collected by BSRC

BSRC collects and stores the following data to process and manage your membership and communicate with you:

- Photograph of member
- Title
- Name
- Address
- Email Address(s)
- Membership type
- Contact Number
- Mobile Number
- Date of Birth
- Nationality
- Occupation
- Previous name
- NRA Membership Number (or indication that you are not an NRA member)
- SCC Expiry Date
- Range officer qualification (BSRC & NRA)
- NRA Coach/Instructor Qualification
- Acceptance of Terms & Conditions of BSRC membership
- Refusal of membership of another club
- Declaration that you are not a prohibited person under the firearms act
- Declaration that you have never had an FAC or Shotgun certificate refused or revoked
- Membership proposer and seconder
- Shooting Qualifications
- Firearms Certificate details

In addition, BSRC assigns and stores:

- membership number
- barcode number (for use on the membership card)

BSRC also records and stores:

- Members since date
- How you obtain your SCC (through BRSC or another club)
- SCC assessment date

- Date SCC requested from the NRA
- Induction course date
- Provisional event completion dates
- Deer competency completion date

Membership Payment records are automatically stored and include:

- Payment reference number
- Payment Date
- State (Complete/pending)
- Payment Type (e.g. PayPal, Cheque)
- PayPal payment ID (if applicable)
- Membership purchased
- Amount paid

No payment card details are collected or held.

#### Signing in Computer System and Firearms Usage Records

Some of the Personal data collected and held in the membership database is used to create members an account on the signing in system installed in the club house to record members attendance and firearms use. The member provided data used is:

- First Name
- Last Name
- SCC Expiry Date

If a member updates any of these data items in the membership database, the system administrator will update the Signing in System database.

The club is required by law to record members' firearms use. To facilitate this, members' firearm information is held on the Signing in System. The data held is:

- Membership Number
- Firearm Make
- Model
- Calibre
- Serial Number
- Active (firearm in use indicator Y or N)

Firearm data is added to the database by the system administrator when requested by a member. Updates to firearm data are completed by the system administrator when requested by a member. Once included in the database, firearm records are not deleted but marked as inactive when a member stops using them. This ensures that the club can satisfy the legal requirement to report on past firearm use.

A back up of the data is taken when the system is shut down and stored securely.

#### Paper Membership Application Form

Prior to the online membership application process being implemented all application data was collected on a paper form. All information collected in this way has been transferred to the membership database. The paper membership application forms are held by the club secretary and stored securely in the club safe.

## Who has access to personal member data?

- BSRC administrators who are given administration rights can see all personal data held by the organisation.
- Members can view and amend their own data on the membership database.

## How long does BSRC keep personal data for?

### Membership database

We will keep personal member data for members with a valid membership.

We will keep personal member data for members who do not renew on the expired members list for 3 months.

We will retain historic records containing personal member data for 10 years. This includes:

- Expired and archived member records.
- Organisation history such as payments, activity logs and attendance records.

### Signing in System

We will keep personal member data (including firearms use) for members with a valid membership

We will keep personal member data (including firearms use) of expired members for a period of 6 years. This is a legal requirement.

## Data Processors

### Membermojo

BSRC uses the services of membermojo to provide secure storage and membership data processing. Their [Privacy Policy](#) describes how they handle member data.

They provide functions that assist members and administrators to exercise individual rights under GDPR.

- Right to access - members can sign in to view their own personal data.
- Right to rectification - members can sign in and amend their own personal data.
- Right to Erasure - administrators can securely delete personal data for members requesting their data be erased. Erasing a member will remove their member record and anonymise any activity, attendance and (optionally) payment records.

### DutyMan

BSRC uses the services of DutyMan to provide data processing service **only for the Range Officer volunteer schedule**. Their [Privacy Statement](#) describes how they handle member data.

BSRC provides the following data when setting up a members account on DutyMan:

- First Name
- Last Name
- Email Address

All other data is provided by you when you edit your DutyMan account data.

## Use of Your Personal Information on DutyMan

The data held on DutyMan is used to:

- Display your duty roster on the web
- Send duty reminders by email
- Facilitate duty swaps via email
- Let people view and update their own information on the web

## Your Access to Your DutyMan Data

- You may view or download your data.
- You may rectify any errors in your data.
- You may delete your data.
- You may stop DutyMan processing your data by deleting your data at any time.

## GDPR Legal Basis for Information Processing

As members have applied for and accepted membership of BSRC they can reasonably expect that the personal data provided will be used to process and manage their membership. It is also reasonable to expect that the club would use the contact information provided to communicate with them concerning membership and club activities. Similarly, it is reasonable for the club to assume that, having taken membership, members would expect to receive communication from the club. Should any member object to receiving communications from the club they can opt out.

Given the above and the identification and assessment of legitimate interests, BSRC will process members data and communicate with members using the GDPR legal basis of legitimate interest.

## Your Rights:

You have the rights to the following:

- The right to be informed (this is the purpose of this notice along with any consent you give)
- The right of access (you may request a copy of your data).
- The right to rectification (you may correct your data at any time)
- The right to erasure (in certain circumstances)
- The right to restrict processing (you may ask us not to process your data but not erase it)
- The right to data portability (you may ask us for a copy of the data in an appropriate format)
- The right to object (in certain circumstances)
- Rights in relation to automated decision making and profiling. (We do not engage in this)

We will retain your data only as long as we need it or must keep it subject to UK legislation and guidance from the Home Office in respect of the operating of a Home Office Approved Club.

## Contacting Us:

We have appointed a data protection officer who will be the point of contact for data privacy related enquiries, who can be reached at [dataprotection@bsrc.co.uk](mailto:dataprotection@bsrc.co.uk) or by writing to us at *[insert address]*.

We may take steps to ensure your identity before responding to your request.

We will respond within one calendar month from receipt by us unless your request is very complex, we will inform you if this is the case. Any time spent verifying your identity adds to the time in which we have to respond.

Normal updates and membership requests may still be directed to the Secretary at [secretary@bsrc.co.uk](mailto:secretary@bsrc.co.uk).

## Your Right to Complain:

If we fail to comply with any of your requests within the prescribed time limits you may complain to the Information Commissioner's office in the UK

## CCTV Images

BSRC is registered with the ICO as an organisation that uses CCTV:

- CCTV is used to record in the interests of supervision, safety and crime prevention.
- For these reasons the information processed may include visual images, personal appearance and behaviours. This information may be about members, members of the public, employees, and those inside, entering or in the immediate vicinity of the area under surveillance.
- When necessary or required this information is shared with the data subjects themselves, employees, agents, service providers, police forces, security organisations and persons making enquiry.
- All images are stored securely onsite in the camera system memory kept in a locked server room and access is password protected. The images/data are stored for approximately 1 month and then are overwritten. This data is not backed up.
- Any complaints which rely on this surveillance about theft/bullying/abuse etc. must therefore be made within 1 month of the incident otherwise the images will have been overwritten.