

WORCESTER BOWMEN

PRIVACY NOTICE

SEPTEMBER 2024

Who we are

- Worcester Bowmen (The Club) is a non-profit, volunteer committee run local sports club, whose purpose is to allow safe access to archery ranges and equipment, coaching and officially recognised progression. The Club is registered with and affiliated to Archery GB.
- 2. Under the <u>Data Protection Act 2018</u>, Worcester Bowmen are NOT required to be registered with the Information Commissioner's Office (ICO).
- 3. Worcester Bowmen is a Data Controller for the membership data of all its members.
- 4. Our GDPR Officer is the Club Secretary and is contactable at info@worcesterbowmen.co.uk
- 5. Worcester Bowmen are committed to protecting your personal information. This notice explains how we collect and use the personal information about you.

Your Data

- 6. We are required by law to hold the personal data of all members of The Club and all participants of training courses, and of all volunteers working with us.
- 7. The Club shall collect and store the following personal information about its members:
 - a. Name and Surname
 - b. Date of birth and age
 - c. Gender
 - d. Address
 - e. Mobile Telephone number or other contact number
 - f. Email address
 - g. Category of membership
- 8. The Club shall collect and store the following special category personal information about its members:
 - a. Information on physical or mental health or social conditions
- 9. Personal data is securely stored electronically within the EU and is accessible by Club Committee members for the purposes of administration and the business of The Club.
- 10. We do not use your contact details to send you any form of third-party advertising.
- 11. Your personal data is accessible to all Club Committee members for the purposes of contacting you about practice session times, tournaments and competitions, safety announcements and club rules, club socials, your personal safety and comfort and other information which may affect access to or use of the club facilities.
- 12. Our website uses cookies a string of information that is stored on visitors' computers which is provided to the website by the user's browser on each visit including, but not limited to, personally identifying information such as Internet Protocol (IP) addresses. We do not access or use this information in any way. Website visitors who do not wish to have cookies placed on their computers should adjust their browser settings to refuse cookies.

13. The club operates a WhatsApp group for the purpose of keeping members of The Club updated on session times and cancellations, along with other immediate information. For members who join the group, the names and telephone contact numbers for each member are available to all other members of the group. Members shall not pass the contact details for any other member to any person or organisation outside of the Club for any reason whatsoever without the express consent of the member whose details are passed on.

Third Party Data Storage

- 14. Our membership database is stored on Sport 80 (https://www.sport80.com/uk), a subscription-based cloud storage system designed specifically for sports clubs, provided to us via Worcester Bowmen's membership of Archery GB. Sport 80 is subject to and compliant with all GDPR requirements.
- 15. Our membership data may also be stored using a Google Drive account accessible to Club Committee members. This account is password protected and the Google Drive platform is subject to and compliant with all GDPR requirements.
- 16. Our scoring data is recorded on Golden Records (GR) (https://archery-records.net/), a subscription-based cloud storage system. Score data is used for the purpose of progression, competitions, awards and club records. Data held on this system comprises of your name, your email address, your age, your gender, your bow type, scores and the dates they were achieved. All members can be given access to, and upload, their own score records where requested. You will be asked to consent to your score data being recorded on GR separately to applying for membership. You do not have to consent if you do not wish for your scores to be included in the club records, or for your progression to be officially recorded. GR is subject to and compliant with all GDPR requirements.

Legal Basis of the processing of any Personal Data

- 17. Membership of a club/organisation requires the administrators of that club/organisation to hold and record personal data for all members for the purposes of the business of the club, health and safety, and insurance. Data processing takes place to meet the club's contractual obligations.
- 18. We rely on the legitimate interest basis to use your personal information in some circumstances. For example, when you apply to become a member of Worcester Bowmen, we have a legitimate organisational interest to use your information to respond to you and give you the benefits of being a member as explained upon joining, and the Website regarding features of being a member.
- 19. We will use the information you give us to:
 - a. Perform services you have requested (such as providing you with Membership Benefits or providing you with information you have asked for).

- b. Administer the sport of Archery, for instance by organising tournaments;
- c. Provide you with information.
- d. Notify you about changes to our service, including but not limited to any changes to the Member Benefits.
- e. Ensure that content from our Website is presented in the most effective manner for you and for your computer.
- f. Any other reasonable purposes of Worcester Bowmen, acting always in accordance with the data protection law (as amended from time to time).

Information Sharing and Disclosure

- 20. We are required to share your information with associate bodies such as Archery GB, and Regional and County organisations (West Midlands Archery Society, County of Worcestershire Archery Association) in order that they may communicate with you regarding membership of these organisations, about archery events or to allow the associate bodies to manage the running of the sport in their areas.
- 21. We may also disclose your personal information to third parties:
 - a. If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
 - b. If Archery GB or substantially all its assets are acquired by a third party, in which case personal data held by it about individuals who have applied for Membership (whether successfully or unsuccessfully) will be one of the transferred assets;
 - c. If we are under a duty to disclose or share your personal data to comply with any legal obligation, or in order to enforce or apply other agreements; or
 - d. To protect the rights, property, or safety of, Our Members, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. No data outside of EEA.
- 22. We require these third parties to comply strictly with our instructions and data protection laws and we will make sure that appropriate controls are in place complying with Archery GB's policies and procedures.

Consent

- 23. If you do not consent to us holding your data, we regret that we cannot process your application, and you cannot take part in a course or join the club.
- 24. Through agreeing to this Privacy Notice, you are consenting to Worcester Bowmen processing your personal data for the processes outlined. You can withdraw consent at any time, but in doing so you will be terminating your membership/participation.

Retention Policy

25. We are required to retain your basic personal data for a period of 5 years after your membership ends for purposes of record keeping and auditing.

Your Rights

- 26. You have the right to see your data held by us at any time.
- 27. You have the right to have any incorrect data we have corrected.
- 28. We do not share your data with anyone outside of the parties described above without your explicit permission.
- 29. There are certain circumstances in which we are required by law to share your data without your consent. These are:
 - a. If we have reason to believe your health/safety is at risk if we do not alert the relevant authority and you are unwilling or unable to do so yourself
 - b. If we have been instructed to do so by a law enforcement officer
- 30. If you feel that we have used your data for purposes other than those outlined above, you have the right to object, and the right to restrict our usage of your data.
- 31. All requests regarding your data must be presented to us in writing, and where necessary, evidence must be provided of errors or misuse before corrective action can be taken.

Changes to this notice and the way we treat personal information

- 32. We may update the terms of this privacy notice at any time.
- 33. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us or by placing a prominent notice on our club website. By continuing to use our club website you will be deemed to have accepted such changes.

Enquires and Complaints

- 34. The Club Secretary is the first point of contact regarding any enquires arising from this Privacy Notice. Where possible, please raise all enquires in writing.
- 35. If you are unhappy with our work or something that we have done or failed to do, please inform us in writing by email to info@worcesterbowmen.co.uk. The Club Secretary will acknowledge receipt of all complaints which will be logged. The Club Secretary will endeavor to investigate the complaint within 1 calendar month.

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