

# **CANTERBURY ARCHERS**

## **Data Protection Policy**



Review date:	1 <sup>st</sup> January 2023
Next review date:	1 <sup>st</sup> January 2024

## **Contents**

Section 1 - About this policy	3
Section 2 – Policy	3
Section 3 – Roles and responsibilities	4
Section 4 – Record of processing activity	4
Section 5 – Privacy Policy	4
Section 6 – Reporting a personal data breach	4
Section 7 – Transfers to third parties	5
Section 8 – Individual rights	5
Section 9 - Under 18's	5
Section 10 – What personal information do we collect	6
Section 11 – Special Category Data	6
Section 12 – What we use your personal information for	7
Section 13 - Photographs	7
Section 14 – Right of Access to personal data	7
Section 15 – Access to personal data refusal	8
Section 16 – Period for which data will be stored	8
Section 17 - Where we may store your information	8
Section 18 – Contact information	9
Section 19 - Policy Compliance	10
Section 20 - Updates to this policy	10
Section 21 – Enquiries and Complaints	10
Signatures on behalf of Canterbury Archers	11
Appendix – Lawful Bases for Processing Data	12

## **Section 1 - About this policy**

Canterbury Archers (We, Our, Us, The club) have a duty to meet its obligations as set out within Data Protection Legislation. We have a duty to ensure that personal information held by us is protected from accidental or deliberate damage, disclosure or unauthorised modification or destruction.

This document sets out our policy on data protection. This policy applies to all personal data processed by us regardless of format.

## **Section 2 – Policy**

The club aims to operate in a professional manner at all times and to be open and accountable for the data we process.

The ICO is responsible for ensuring compliance with Data Protection Legislation and has powers under the UK General Data Protection Regulation (GDPR) to take action against organisations which breach data protection law including fines and enforcement notices.

Any breaches must be reported to the Data Protection Officer (DPO). The DPO is responsible for monitoring compliance with Data Protection Legislation.

Canterbury Archers will process data in accordance with six principles of the UK GDPR. This includes:

1. **Lawfulness, fairness and transparency** - Personal information will be obtained and processed lawfully, fairly and in a transparent manner in relation to individuals.
2. **Purpose limitation** - It will be obtained and processed for specified purposes.
3. **Data minimisation** - Personal information shall be adequate, relevant and not excessive in relation to the purpose for which it is processed.
4. **Accuracy** - Personal information shall be accurate and kept up to date where necessary; having regard to the purposes for which they are processed, ensuring they are erased or rectified without delay.
5. **Storage limitation** - Personal information will not be kept for longer than is necessary for the purpose for which it is processed except where the personal data will be processed solely for archiving purposes in the public interest or historical research purposes or statistical purposes subject to the implementation of the appropriate measures required by the UK GDPR in order to safeguard the rights and freedoms of individuals.
6. **Integrity and confidentiality** – Appropriate measures shall be taken to ensure that personal information is secured against unauthorised/unlawful processing, accidental loss, damage or destruction

## **Section 3 – Roles and responsibilities**

Canterbury Archers are responsible for ensuring that personal data is processed in accordance with Data Protection Legislation. These responsibilities include but are not limited to ensuring that personal data is kept securely, in the right hands and that it is accurate. However, there are specific responsibilities allocated to certain individuals.

### **The club shall ensure that:**

- It pays its fees to the Information Commissioner's Office.
- It has a specific person for ensuring compliance with Data Protection Legislation.
- Anyone processing personal data on behalf of the club understands that they are responsible for complying with the Data Protection Legislation.

### **The Data Protection Officer has responsibility for:**

- Monitoring the club's compliance with Data Protection Legislation.
- Providing advice and guidance on all data protection matters.
- Analysing all incidents, determining when a breach will be a breach, and reporting to regulatory authorities as applicable.

### **Club officers and committee members:**

All club officers, committee members and any others processing data on behalf of the club shall ensure that they process information in accordance with Data Protection Legislation.

## **Section 4 – Record of processing activity**

The club shall ensure that a written record is kept of its data processing activities.

## **Section 5 – Privacy Policy**

Canterbury Archers shall ensure that a privacy policy is published on the club's website. This policy shall explain:

- The purpose for which the club will process data collected.
- Where the club will keep the information and why we hold it and for how long.
- Where we get personal data from and whom it is shared with.
- Contact details for the club and DPO to allow for requests for further information.

## **Section 6 – Reporting a personal data breach**

Data Protection Legislation requires the club to notify personal data breaches to the ICO and, in certain instances, the data subject. This will be done by the DPO; no other persons should attempt to notify the data subject or the ICO.

If members know or suspect that a personal data breach has occurred, they must immediately notify the DPO.

## **Section 7 – Transfers to third parties**

If the club is asked to transfer personal data to any third parties such as Kent Archery Association or Archery GB, such transfers will be completed in accordance with Data Protection Legislation. The club will only release information when it is obvious that consent has been obtained.

Personal information is shared with Archery GB (AGB), Southern Counties Archery Society (SCAS) and Kent Archery Association (KAA) for their administration purposes. Their Privacy Policy and Data Protection Policy can be found on their websites.

<https://archerygb.org/>

<https://kentarcheryassociation.co.uk/>

<https://scasarchery.org.uk/>

Archery GB need the information for Direct Membership and use it to enable access to an online portal for members (<https://agb.sport80.com>) which, amongst other things, allows members to set and amend their privacy settings and communications from Archery GB. If a member has any questions about the continuing privacy of personal data when it is shared with AGB, they should contact [gdpr@archerygb.org](mailto:gdpr@archerygb.org).

## **Section 8 – Individual rights**

Data protection legislation provides the following rights:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to portability
- The right to object
- The right to lodge a complaint with the ICO

## **Section 9 - Under 18's**

Generally, children have the same rights as adults under UK GDPR. This includes right to object to the use of their information, right to erasure, right to modify and right to be informed. Children can exercise these rights as long as they are competent to do so. Where they are not considered to be competent, an adult with parental responsibility may usually exercise the child's data protection rights on their behalf.

## **Section 10 – What personal information do we collect**

When a new member joins our club, we collect their title, name, email address, home address, phone numbers, date of birth and any relevant medical or disability needs that

the club needs to be aware of. In the case of junior members, under the age of 18, we also collect contact information of a parent/guardian.

In the case of events or competitions hosted by Canterbury Archers, we collect participants' contact information and names.

## **Section 11 – Special Category Data**

Special Category Data means personal data consisting of information as to:

- The racial or ethnic origin of the data subject;
- Political opinions;
- Religious beliefs or other beliefs of a similar nature;
- Whether he/she is a member of a trade union
- Physical or mental health or condition;
- Biometric and/or genetic data;
- Sex life or Sexual Orientation.

Canterbury Archers gathers information on relevant medical or disability needs that we need to be aware of. The Club will rely on one or more of these ten available lawful bases for processing Special Category Data as provided under Article 9 of the UK GDPR:

- Explicit Consent: freely given, informed and evidenced by a clear affirmative action;
- Employment, social security or social protection law: necessary to meet legal obligations in these specific areas
- Vital Interests: necessary to protect the life of the data subject or another individual where they are physically or legally incapable of giving consent;
- Not-for-profit Bodies: processing carried out by a political, philosophical, religious or trade union;
- Deliberately made public by the Data Subject: data that has manifestly been placed in the public domain by the Data Subject;
- Legal Claims: necessary for establishing, exercising or defending legal rights;
- Substantial Public Interest: necessary for reasons of substantial public interest e.g. official functions, statutory purposes, equal opportunities or preventing or detecting unlawful acts;
- Health and Social Care: necessary to preventative or occupational medicine, for the assessment of the working capacity of an employee, medical diagnosis, provision of health or social care or treatment or management of health and social care systems;
- Public interest in the area of Public Health: such as threats to health or ensuring high standards of healthcare; and
- Archiving Purposes: public interest, scientific and historical research purposes or statistical purposes.

## **Section 12 – What we use personal information for**

We use personal information to inform members of club events, news and other important club information. We also use personal information for administration purposes such as shooting classifications.

In the case of events or competitions hosted by Canterbury Archers, we use participants' personal details to send information about the event and the results and pictures from the event. We may also use these details to inform participants of future events at the club.

## **Section 13 - Photographs**

If someone can be recognised from a photograph it's usually considered their personal data.

When members join our club, they are asked on the membership form if they are happy for their photos to be taken and if they are happy for these to be shared on the website and the club's social media. In the case of junior archers, parent/guardian consent is also obtained. If members/parents/guardians wish to opt-out of photos or have photos of them/their child deleted, it is their right to do so.

At club events or competitions, participants are advised that photos will be taken during the day by a named person for the club website and social media and that they can opt-out if they wish. Anyone taking photographs not on behalf of the club will need to complete the Photography and Filming Consent Form if they are taking photos of anyone under the age of 16.

(If the child is over 16, it's good practice to inform parents that photographs and/or videos of their child may be used if the child has given consent.)

Canterbury Archers will take all steps to ensure these images are used solely for the purposes for which they are intended. If you become aware that these images are being used inappropriately, please inform us immediately.

## **Section 14 – Right of Access to personal data**

Any data subject whom we hold data on has a right to ask us about personal data that we hold for them. The rights under data protection legislation in relation to accessing personal data are:

Within one calendar month of a request being made and free of charge, a data subject is entitled to:

- Be told whether personal data, of which he or she is the subject, is held in our records, or otherwise processed by us.

- Given a description of the personal data, the purpose for which the data is being or may be processed and the persons to whom the data has been or may be disclosed.
- Have communicated to them in an intelligible form the personal data held about them.
- Be told the envisaged period of time for which the data will be stored or, if not possible, how it will be decided when it will be destroyed.
- Be informed of their right to the erasure of personal data; the right to object to processing; the right to rectification of data; to restriction on processing; and the right to object to processing.
- Be informed of their right to complain to the ICO.

An individual's rights as a data subject can be found on the [Information Commissioner's Office website](#).

Completion of a Subject Access Request is required to obtain the information. The request must be made in writing. Any inaccurate, out of date, irrelevant or excessive data will be dealt with under the procedures outlined previously in this policy.

We will attempt to reply to subject access requests as quickly as possible and in all cases within one month as set out in the Data Protection Legislation.

Repeat requests will be fulfilled unless the period between is deemed unreasonable, such as a second request received so soon after the first that it would be impossible for the details to have changed.

## **Section 15 – Access to personal data refusal**

Data Protection Legislation allows Canterbury Archers to refuse an individual's request to access personal data if allowing them access would affect the rights and freedoms of others. This can include data held for child protection or crime detection/prevention purposes, etc. However, most individuals will be able to have a copy of the data held on them. For further information on subject access request refusals, please refer to data protection legislation.

## **Section 16 – Period for which data will be stored**

We will only keep personal information for as long as we consider that it is necessary to be retained. Once personal information is no longer needed or an individual ceases membership at Canterbury Archers, it will be deleted or destroyed confidentially.

In the case of events or competitions hosted by Canterbury Archers, personal information will be stored for no longer than two years. After this period, it will be deleted or destroyed confidentially.



Photographs will be kept by the club indefinitely for archiving purposes in the public interest and historical research purposes. We are committed to safeguarding the rights and freedoms of the data subject. Should an individual wish to opt out of having their photograph taken or request that a photo of them be deleted, it is their right to do so.

## **Section 17 - Where we may store your information**

The personal data that we collect will be stored under the control of Canterbury Archers and its officers in accordance with data protection legislation.

Canterbury Archers will take the steps necessary to ensure personal data is treated securely and in accordance with the GDPR.

We use Google services such as Gmail, Google Contacts and Google Drive to store personal information. When data leaves a device it is encrypted using the TLS standard. It is then uploaded to Google Drive servers. After reaching Google servers, it gets unencrypted and then re-encrypted using 128-bit AES. The AES encryption keys that are used to encrypt data are then, themselves, encrypted with a rotating set of master keys. This adds another layer of standard security by requiring a second set of encryption keys to get to the data. Google has worked with the GDPR and is committed to complying with those laws. Google does not share personal sensitive information with other people.

Information that is uploaded to Google services is stored on their servers across the world including America, Asia and Europe. UK GDPR requires personal data to be stored within the UK however GDPR sets out certain conditions for the transfer of personal data outside of the UK. Such conditions can be met via mechanisms such as standard contract clauses. Standard contractual clauses (SCCs) are written commitments between parties that can be used as a ground for data transfers from the EU to third countries by providing appropriate data protection safeguards. SCCs have been approved by the European Commission and can't be modified by the parties using them. Such clauses have also been approved for transfers of data to countries outside the UK and Switzerland. Google rely on SCCs for data transfers where required. If you want to obtain a copy of the SCCs, contact Google here:

<https://support.google.com/policies/>

For more information, please review Google's GDPR statements:

<https://cloud.google.com/privacy/gdpr>

## **Section 18 – Contact information**

### **Contact information for the data controller**

Canterbury Archers  
The Archbishop's School  
St Stephens Hill,  
Canterbury,  
Kent,

CT2 7AP

Email: [canterburyarchers@gmail.com](mailto:canterburyarchers@gmail.com)

**Contact information for the Data Protection Officer**

Alex Wellard

Canterbury Archers

The Archbishop's School

St Stephens Hill,

Canterbury,

Kent,

CT2 7AP

Email: [canterburyarcherswebsite@gmail.com](mailto:canterburyarcherswebsite@gmail.com)

**Section 19 - Policy Compliance**

We understand that compliance with this policy is important and any breaches can be a criminal offence.

If an individual does not understand the implications of this policy or how it may apply to them, seek advice from the DPO.

**Section 20 - Updates to this policy**

This policy shall be reviewed from time to time and shall be updated where appropriate.

**Section 21 – Enquiries and Complaints**

Please email the [canterburyarchers@gmail.com](mailto:canterburyarchers@gmail.com) regarding enquires arising from this document.

If you are unhappy or there is something we have failed to do, please inform us in writing. We will acknowledge and investigate all complaints.

You may also complain to the Information Commissioner's Office (ICO) if you are concerned with how we are handling your personal information using their online form which can be found below:

<https://ico.org.uk/concerns/handling/>

### **Signatures on behalf of Canterbury Archers**

<b>This policy was reviewed by:</b>	<b>Name:</b>	<b>Positions:</b>
	Alex Wellard	Data Protection Officer
	Signature:	Date:
<b>Policy review approved by:</b>	Karen Young	Club Chairperson
	Signature:	Date:
<b>Next planned review date:</b>	1 <sup>st</sup> January 2024	

## **Appendix – Lawful Bases for Processing Data**

6 legal bases for general processing of Personal Data Processing shall be lawful only if and to the extent that at least one of the following applies:

- (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- (b) 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;
- (c) processing is necessary for compliance with a legal obligation to which the data controller is subject;
- (d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;
- (f) processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. (This does not apply to processing carried out by public authorities, such as Universities, in the performance of their public tasks).