



Lancashire Archery Association

Data Protection & Privacy Policy

Introduction

The Lancashire Archery Association (LAA) membership data is held by the sport's governing body Archery GB (AGB). For the purposes of administering membership of the county association this data is provided by AGB, who is the data controller for membership data. Collection and use of membership data is subject to the AGB data protection policy. A copy of the AGB data protection policy can be found at:

<https://archerygb.org/resources/find-a-document>

enter "data protection" in the keyword field and click the spyglass / search

Lancashire Archery Association (LAA) is a data processor of the membership data held by AGB.

The LAA hosts a number of archery tournaments and events throughout the year for which the LAA collects personal information from applicants / attendees and therefore has a legal obligation to comply with the UK Data Protection Act, which came into force in May 2018. This is the act which encompasses the European General Data Protection Regulations (GDPR). We must also ensure that all data collected and stored by the association is managed correctly. Ensuring that personal data is accurate and up to date. It must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, theft, destruction or damage, using appropriate technical or organisational measures with integrity and confidentiality.

The LAA is the data controller and processor for the data collected in respect of tournaments and events organised by the association.

Definitions

- **Data Controller**
This is the organisation not an individual. In our case it is the Association Committee. The data controller determines what data to collect, how it is processed and what it is used for.
- **Data Processors**
These are organisations that process data on behalf of the data controller. Processing includes the storage of data, so if we were to use online storage such as Google, they become one of our data processors.
- **Data Protection Officer**
There is no formal requirement to have one but the committee has appointed one of its members to be so. Their role is to be aware of how we process and use members' data and ensure we do not breach our policy for data protection. They also make sure that the committee reviews the policy and its implementation regularly.
- **Accountability Principle**
GDPR introduces an accountability principle that requires the Committee to be able to demonstrate compliance with the data protection principles. The principles refer to a 'Data Controller' (see earlier definition).
- **Personal Data**
Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone, or in conjunction with any other information in the possession of the person controlling the data. The processing of personal data is governed by the General Data Protection Regulation (GDPR).



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Our Policy

Legitimate Interest v Consent

We do not have to ask for an individual's consent to process their data or contact them when it is in our legitimate interest to do so, although when highly sensitive information is required specific consent will be sought. But first we need to assess what our legitimate interests are. To do this we need to; (a) identify our interests, (b) check that they are necessary and (c) balance them against the "rights and freedoms" of the individual. A full Legitimate Interest Assessment has been carried out and is available to view on request.

- a) Our constitution tells us that the objects of our organisation include "...the promotion and encouragement of Archery in all its forms,...". We do this by offering Tournaments, Have a Go, Taster and Training events, open to all members of the LAA and members of AGB.
- b) It is in our legitimate interest to collect and store personal information from members, applicants / attendees of LAA organised events in order to provide the facilities and services associated with offering Tournaments, Have a Go, Taster and Training events.
- c) Would an attendee reasonably expect us to use their data in this way? Yes, because they have already expressed an interest in our activities by becoming a member of AGB or an AGB affiliated Club. We tell them that we will use their information in this way in our Privacy Policy (see Appendix A) and at the point when they provide their information (application / entry forms). Does the processing of their data in this way impinge on their rights and freedoms? No, but when we communicate electronically with people to provide information / news we should always give them an opportunity to unsubscribe. Note that we should not pass individuals' email addresses on to any other organisation or other members. If we thought it necessary to do this we would need to ask individuals for their explicit consent. When we provide personal information to third parties, we will always seek explicit consent, except when providing this information to The Grand National Archery Society, the National Governing Body (Archery GB).

Evidence of members engaging with our legitimate interests

We need to record where and when individuals provide their data to us so that we have evidence of these circumstances.

Putting our policy into practice

The entry forms which we use to collect members / applicants / attendees data, etc. inform applicants how we plan to use their personal data. This information is also contained within our Privacy Policy. Please refer to Appendix A.

Processing - External

The organisations that we provide information to are (currently):

- Google.com for electronic mail storage.
- Dropbox.com for electronic storage.
- Squarespace.com for website hosting

A risk assessment of these organisations is contained in Appendix B

Processing – Internal

- Our tournament / event organisers operate a system for collecting data for tournaments "have a go" events, training courses etc.



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- Our website manager maintains a list of members who have registered for various access rights to the website.
- Certain committee members have access to Google Drives and Dropbox for secure storage and backup of data.
- Event applicant details are only available to those LAA committee members and event organisers who require it to undertake their duties.

Please refer to Appendix C for the Internal Processing Risk Assessment.

Notification of a Breach

Should we learn that there has been a suspected breach in security, were possible, we will take immediate action in an attempt to mitigate the situation, before informing members that might be affected or the Information Commissioners Office (ICO). The latter should always be notified within 3 days of confirming a data breach has taken place. Please refer to Appendix E - What Constitutes a Data Breach?

Retention of Data

- Details of attendees at LAA events required for legal reasons such as an insurance claim, complaint, etc. will be retained until the process is complete but may need to be held indefinitely.
- Personal contact details of attendees at LAA events will be retained for a period of up to 12 months after the event has completed, unless retained for purposes described above.
- Non-personal financial documents will be retained for at least seven years,
Please Note: we do not hold any personal financial details of members.
- AGM reports, annual accounts and minutes should be retained for the life of the association.
- Committee meeting minutes should be permanently retained but, where it is difficult or impractical to do so, a minimum of six years is recommended.
- Committee members who hold information will delete or return all files and documents when relinquishing their roles.

Committee Members Responsibilities

Moving Data by Email

- On the rare occasions when lists are moved from one volunteer to another they must be in a password-protected document.

Sending Emails

- Due to Data Protection laws, letting recipients see each other's email addresses when sending out bulk emails can be considered a data breach. Using "Bcc" is the best way to avoid this when sending out messages to people who don't necessarily know each other. Apart from internal Committee emails, when sending emails to multiple recipients we should use the "Bcc" facility so that the email list is not broadcast to everyone on the list.

Do NOT give out members' or applicants / attendees data without their consent.

Personal Details on our website

We will not publish any personal contact details on our website unless the individual has given their explicit consent.



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Sending Information via the LAA Facebook chat / Instant Messaging Services

Members will be invited to use the associations Facebook page as appropriate. It is an individual members personal choice whether they choose to participate.

- Face book chat / Instant Messaging systems will only be used for LAA business.
- Members must not send personal contact details of anyone via the LAA Facebook page.
- Members have the right to unsubscribe from messaging services at any time.

Scam Emails

Committee members should be aware that scammers can send an email from what appears to be a legitimate email address requesting members' details or the treasurer to transfer money. Always physically check that the intended recipient is legitimate.

~~~~~ End ~~~~~



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### Appendix A - Privacy Policy

#### Introduction

This privacy policy sets out the way we process your information and how we use it. We will refer to this policy when we ask you for your specific consent, or use your data in our legitimate interest. The Data Controller is the LAA committee. All members are subject to the General Data Protection Regulations which are encompassed within the UK Data Protection Act, which came into effect on 25th May 2018.

#### How we collect your information

We collect your personal information via the application / entry form when you register an interest in an LAA tournament, Have a Go, Taster or Training Session (temporarily). Personal contact details of squad members are also held by the team managers to allow important squad communications.

#### Information we collect:

- Your name and postal address
- Your email address
- Your phone number(s)
- Date of birth, to provide suitable safeguarding of junior members and allocate competitors to the appropriate age group
- Gender, under AGB and World Archery rules gender is required to allocate competitors to the appropriate tournament category.
- Via specific consent: any relevant Medical Conditions; Required drugs/medical equipment; consent to First Aid treatment; Physical Contact during Coaching.
- Members under 18 years of age will require consent from a parent or guardian before giving us your personal information.
- Emergency contact information, permission of the emergency contact should be sought prior to passing this information to us.

#### How we use your personal information

We process your information for our legitimate interests in fulfilling our objectives as laid down by our constitution. These include ensuring a duty of care to all members of the association, to provide all its services in a way that is fair to everyone and to ensure that all present and future members receive fair and equal treatment.

- Applicants / attendees of LAA tournaments and events may have their personal details checked against the governing bodies membership database for the purposes of ensuring membership is current and public liability insurance cover is available.
- The LAA do not use personal information for attending an LAA tournament or event for any other purpose than the administration of the tournament / event for which it has been provided.
- Individual contact details may be forwarded to the governing body for the purposes of records, ranking points and medal claims e.g. Rose Awards.
- Attendees names, shooting categories and tournament results will be published on the LAA website.

You have the right to object to any of this processing if you wish, and to do so, please refer to Your Rights section, below.

#### ***We use your information in the following ways:***



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- Compliance with legal, regulatory and governance obligations and good practice;
- The administration of membership and attendance at LAA events;
- To communicate with individuals when necessary;
- To tell members about the activities they can take part in;
- To inform members generally about the activities of the Association and the wider Archery movement;
- To provide notice of our AGM or when necessary EGM;

### Sharing your information with others

We do not regularly share your information with any other organisations other than our data processors. These are (currently) :

- Google for electronic document storage and electronic mail storage;
- Dropbox.com for electronic document storage.
- Squarespace.com for website hosting
- When requested, the Police, law enforcement and security services: to assist with the investigation and prevention of crime.

Due to the nature of these organisations we are satisfied that the risk of a security breach is low.

### How long is your information retained?

Attendees details at LAA events is retained for period of up to 12 months after the event, unless they are being retained for legal reasons such as an insurance claim, complaint, etc. in which case they will be retained until the process is complete, but may be retained indefinitely for legal reasons.

Attendees names, shooting categories and scores at tournaments are retained indefinitely.

Membership information is held by AGB and is subject to the AGB Data Protection and Privacy Policies.

### Your Rights (Please refer to Appendix D for a list of your rights)

You have the right to ask us, in writing, for a copy of all the personal data held about you. (This is known as a "Subject Access Request"). To do this, you should contact the association by EMAIL to the LAA secretary at [laasecretary54@gmail.com](mailto:laasecretary54@gmail.com). If you do this you should include your telephone number so we can verify your identity.

You can also ask us to delete some or all of the information we hold about you. You can make this request by contacting the association by EMAIL to the LAA secretary at [laasecretary54@gmail.com](mailto:laasecretary54@gmail.com). If you do this you should include your telephone number so we can verify your identity.

**PLEASE NOTE:** If you request us not to store or process your contact details (Name, Address & Phone No., email address) we will be unable to offer you any of the facilities and services provided by the LAA e.g. participation in an LAA tournament.

### Updating and amending your personal information

It is the individual members / applicants responsibility to ensure that the data that the Association holds is accurate and up to date. If your information needs amending you should inform us.

*If you have any queries about the use of your data, please contact the LAA secretary at:*  
[laasecretary54@gmail.com](mailto:laasecretary54@gmail.com)



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## **Policy Review**

This policy and its implementation will be reviewed at least annually and whenever there are any legislative changes or amendments to guidance issued by relevant statutory bodies.

The above Policy's were adopted by LAA Committee on: see document control table (last page of this document)



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### Appendix B - Security Assessment of External Processors

We are satisfied that Archery GB, and Google.com, Dropbox.com, Squarespace.com have good security practices and therefore pose a low risk to the security of members' data. We have based this judgement on the statements that they have made in their privacy-policies at:

<https://www.archerygb.org/privacy-policy/>

<https://policies.google.com/privacy?hl=en>

<https://www.dropbox.com/terms>

<https://www.squarespace.com/privacy>

### Appendix C - Internal Processing - Security Assessment

Our Website Manager maintains a list of members who have registered for various levels of access to the website.

Our Tournament / Event organisers maintain lists of applicants / attendees and their personal data who have applied attended an LAA tournament / event.

Our newsletter editor maintains a list of members who may wish to contribute to or receive the newsletter.

Various officers, such as our Judges, Coaches and Welfare Officer also require the use of personal data to allow them to undertake their duties.

As suitable security measures are in place, all of these processes are assessed as low risk.

### Appendix D - The list of a Data Subjects Rights

GDPR requires organisations to be aware of individuals' rights which are:

- 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 data portability
- The right to object

### Appendix E - What Constitutes a Data Breach?

A personal data breach is about more than just losing personal data. It means a breach of security which leads to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. Some of the ways you could suffer a breach are:

- Weak/stolen credentials e.g. passwords;
- Lost/stolen computing devices (including memory sticks), containing personal data;
- Systems and application vulnerabilities;
- Malware attacks;





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- Insider threats;
- User error;
- Access by an unauthorised third party;
- Deliberate or accidental action (or inaction) by a controller or processor;
- Sending personal data to an incorrect recipient;
- Not using "BCC" when sending group emails.
- Sending personal data without consent (someone asks you for a friend's contact details);
- Alteration of personal data without permission;
- Loss of availability of personal data.

Cyber-crime and hackers present an ever-present threat to organisations. While effectively ensuring your defences against these types of attacks is critical, many data breaches are caused by human error. Loss of paperwork, data sent to the wrong recipients, insecure disposal of hardware, loss of unencrypted devices and failure to redact names are all avoidable.



# Lancashire Archery Association Data Protection & Privacy Policy

| DOCUMENT CONTROL TABLE            |                                        |                        |                                                                                          |
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| V1.1D                             | 24 <sup>th</sup> January 2024          | T. Dodd                | Initial Review – corrected typographical errors and minor changes to wording for clarity |
| V.1.2D                            | 3 <sup>rd</sup> February 2024          | G. Burrows             | Updated retention period to 12 months post discussions with tournament organiser         |
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