

# Data Protection Policy

## Ham & Petersham Rifle & Pistol Club

The Ranges, Ham Street, Richmond, Surrey, TW10 7RT



Created	
Last updated	December 1st 2018

**Note about this policy:** This document sets out how Ham & Petersham Rifle & Pistol Club uses and protects any information that you give as a guest or member of HPRPC. We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy statement. We may update this policy to comply with local and international laws.

**This policy has due regard to legislation and statutory guidance, including, but not limited to the following:**

- The Regulation of Investigatory Powers Act 2000*
- The Protection of Freedoms Act 2012*
- The General Data Protection Regulation (GDPR) 2018*
- The Data Protection Act (DPA) 1998 & 2018*
- The Freedom of Information Act 2000*
- The Freedom of Information and Data Protection Regulations 2004*
- The Equality Act 2010*

### Definitions

<b>HPRPC</b>	means Ham & Petersham Rifle & Pistol Club
<b>GDPR</b>	means the General Data Protection Regulation.

### 1. Data protection principles

HPRPC is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the

purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## **2. General provisions**

- a. This policy applies to all personal data processed by HPRPC.
- b. The Responsible Person shall take responsibility for the HPRPC’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. HPRPC shall register with the Information Commissioner’s Office as an organisation that processes personal data.

## **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, HPRPC shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to HPRPC shall be dealt with in a timely manner.

## **4. Closed-circuit Television (CCTV)**

- a. Sound recordings will only be obtained only where absolutely necessary to support the legitimate reasons. The use of CCTV surveillance systems will not be ‘normalised’ in the working environment to record conversations between the public and employees.
- b. Recordings from CCTV systems are to be securely stored and access restricted to authorised personnel within HPRPC.
- c. CCTV recording is in place for the safety and security of HPRPC and is of an appropriate quality to meet the purpose intended.
- d. CCTV recordings that no longer serve a purpose will to be deleted. The retention policy is agreed and clearly understood by CCTV system operators within HPRPC.
- e. Signage will be in place to notify individuals of surveillance information processing, such as their presence in an area where CCTV is in operation, and their rights of access to recordings/ images of themselves.

## **5. Lawful purposes**

- a. All data processed by HPRPC must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. HPRPC shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in HPRPC’s systems.

## **6. Data minimisation**

- a. HPRPC shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Out-dated personal data will be stored for a set amount of time as required by law, which will be disposed of appropriately when that time has passed.

## **7. Accuracy**

- a. HPRPC shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **8. Archiving data**

- a. To ensure that personal data is kept for no longer than necessary, HPRPC has an archiving policy in place for each area in which personal data is processed and reviewed annually.
- b. Archived personal data will be reviewed annually, out-date documentation will be appropriately disposed of.

## **9. Security**

- a. HPRPC shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Paper copies of personal data will be secured within a safe.
- c. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- d. When personal data is deleted this should be done safely such that the data is irrecoverable.
- e. Appropriate back-up and disaster recovery solutions shall be in place.

## **10. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, HPRPC shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO website.

## **11. Requesting your records held by HPRPC**

You can request a copy of all documentation and personal data held by HPRPC under The Data Protection Act (DPA) 1998 & 2018. All requests must be written and will be processed within 30 working days.

**END OF POLICY**