

HBSA Data Privacy Notice

The Data Protection Act 2018 incorporating the GDPR places an obligation on any organisation that stores personal data about natural living persons to ensure that they understand what data is being stored, why it is being stored and what is done with it. This notice serves to inform Members, Guests and Subscribers of the nature of the data processing activities of the HBSA.

The HBSA recognises the Information Commissioner's office in the UK as our lead supervisory body. The HBSA is registered with the ICO as a data controller reg No: ZA257565.

For clarity, the HBSA is the Data Controller of data belonging to Members, Guests, and Subscribers (hereafter "you", "your"), The HBSA (hereafter "we", "our") may make use of third party service providers or Data Processors such as online membership systems, online forums, email management services, print and mailing houses, videoconferencing, and online backup/storage facilities.

The use of these processors may warrant the transfer of your personal information outside of the UK or EU. Where this is necessary this may be to countries or territories around the world. We are required to ensure that when we need to do this we comply fully with all aspects of the DPA2018 to ensure your data is suitably protected.

We will undertake to store personal data securely in accordance with UK Law and EU data security principles.

By way of this notice we will inform you what information is stored about you and for what purpose it may be used. We will only process data for which we have a legitimate and proportional use.

Our legal bases for processing your data are:

1) Fulfilment of contract. By agreeing to be a member or subscriber you have entered into a contract with us.

2) Legal Obligation. (in the case of members and shooting guests only) As a home office registered club we are bound by law to report to our controlling police force when an application to join is made. We are also obliged to report when a member has left us. We are also compelled to maintain records of your (including guests) attendance at firearms related events such as range days and also details of any firearms used.

3) Consent. You will be asked to consent to us using your images for use in publicity related material. You may withdraw this consent at any time but should be aware that if published your image will enter the public domain. This does not apply to membership card photographs.

Subscribers have the option to inform us of date of birth to aid our content and distribution strategy. You may withdraw this consent at any time.

4) Legitimate interest. As an Historical Society we feel that a record of members of the HBSA has historical value (limited to title, name, dates of joining and leaving) As such we will maintain these indefinitely however we recognise that you may still exercise your rights

as detailed below. We may send you surveys or details of related events that are in accord with our aims as an historic or shooting organisation.

We may share your details with 3rd parties should we need to recover monies or goods etc or to defend any legal action.

Your rights:

You have the rights to the following:

1. The right to be informed (this is the purpose of this notice along with any consent you give)
2. The right of access (you may request a copy of your data).
3. The right to rectification (you may correct your data at any time)
4. The right to erasure (in certain circumstances)
5. The right to restrict processing (you may ask us not to process your data but not erase it)
6. The right to data portability (you may ask us for a copy of the data in an appropriate format)
7. The right to object (in certain circumstances)
8. 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. These timings are given in the tables below.

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@hbsa-uk.org or by writing to us at BCM HBSA, Data Protection, London, WC1N 3XX. 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 membership registrar at membership@hbsa.uk.org

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

Why we need your data:

We will use the data collected in order to process membership applications, membership renewals, collect monies due, issue membership cards and maintain contact electronically and via printed publications. You may opt out of email bulletins and forum messages but not membership renewal related emails unless you have resigned. You may request that we do not send you our printed publications. We will also use your data in the execution of normal club activities such as lectures, publications, and competitions or other related events.

We may occasionally use your contact information to send non-commercial surveys that help us further our aims and objectives to you. We may also send you non-commercial surveys on behalf of other related organisations to further our aims and objectives and those of the shooting community in general, but we will not share your data with them. If you share data with them this will be subject to their data policies. (Membership activities) You may opt out of these easily at any time by amending your record on our membership software or by unsubscribing to any group email sent from this software.

We will also use the data collected in order to comply with reporting requirements or in order to comply with relevant firearms legislation and guidance from the Home Office in respect of the operating of a Home Office Approved Club. (Legal, Legal reporting)

We may also release member's and guest's names as part of competition results (this may contain details of firearms used), as well as other activities such as lectures as well as on occasion photographs and/or moving images of activities into the public domain. We will seek your permission before using your images.

We may on occasion process and produce anonymised data for the purposes of statistical analysis for our own uses or to make public.

Sources of data:

The majority of the data we process is given by you, but we may also record data such as range and event attendances as well as decisions made by us concerning your acceptance for or continued membership. This may include supporting information from police forces and other organisations that you have authorised to vouch for you.

Minors:

We do accept minors into the HBSA as junior members, and in these circumstances a parent or guardian must give consent for us to hold their data. Due to other legal restrictions we do not permit direct access to any form of social media that we may use (such as the HBSA forum).

Who we share data with:

Surrey and Sussex Police: To comply with Home Office guidance on registered club status.

Other police forces: To confirm membership details for your FAC renewals.

Other government agencies: In connection with the status of Home Office approved club.

1 & 1 Ionos Ltd: We use Ionos to securely store all of our data and share between officers of the HBSA. Ionos have no access to this data. We also use them to host our email server.
Zoho Corporation – used to manage our information and marketing emails to you. We receive performance information based on you opening or forwarding any emails sent via Zoho.

Fairhall and Bryant Ltd: – print and post our printed material to you.

Iml (UK Mail Limited) – we use Iml to send membership and subscription renewal notices by post.

Andrew Beverley t/a Simplelists.com We use Simplelists’ services to host a private forum for our use only. We will create an account for you, but you can leave at any time. You may request that we delete your account. If you cease to be a member we may delete your account. We also use Simplelists to provide email services linked to forum posting for member use. We may also inform you of events paid and unpaid via this forum.

PayPal Inc: We offer the opportunity to pay for goods and services by PayPal. We do not process any data in relation to this bar your email address and name and details of the transaction.

Stripe Inc: We offer the opportunity to pay for goods and services by card. We do not process any data in relation to this bar your email address and name and details of the transaction.

Membermojo Ltd: We use Membermojo’s membership system to store and process membership details, renewals and membership card production and fulfilment. We may also use Membermojo to send you email communications.

Zoom Video Communications Inc: We use Zoom to host video meetings and conferences or webinars. The use of zoom by members may necessitate the creation of an account.

Flickr (SmugMug Limited) Used to host and make available to all images of HBSA events and articles of interest.

YouTube: We may make video productions, lectures, and other events available on YouTube.

Legal representatives and collections agencies: We may on occasion share specific and proportional data in order to pursue our legitimate interests.

NRA of the UK: If you request a shooter’s certificate of competency from the NRA via us we will pass your details along with any assessment records to the NRA in order that they may issue a certificate.

Should the officers and/or directors of the HBSA decide to make use of any new processor or change the way in which we use the data we will update this notice and inform you by posting it on our website.

Personal Data to be processed for all full members:

Data Description	Reason for processing	Retention Period *
Full Name	Legal reporting, membership activities	6 Years**
Title	Legal reporting, membership activities	6 Years**
Date of Birth	Legal reporting, membership activities	6 Years
Place of birth	Legal reporting	6 Years

Address	Legal reporting, membership activities	6 Years
Date of Application	Legal reporting, membership activities	6 Years
Membership Grade	Membership activities	6 Years
Date of Election	Legal reporting, membership activities	6 Years**
Membership ID Photograph	Membership activities	6 Years
Email Address	Membership activities	6 Years
Phone numbers	Membership activities	6 Years
FAC Details	Legal	6 Years
SGC Details	Legal	6 Years
Areas of Interest	Membership activities	6 Years
Areas of Expertise	Membership activities	6 Years
HBSA SCC supply	Membership activities	6 Years
Relevant Qualifications (NRA/MOD rco etc)	Membership activities	6 Years
NRA Membership	Membership activities	6 Years
Function/Position in the HBSA	Membership activities	6 Years
Attendance details	Legal reporting, Membership activities	6 Years
Firearms used details	Legal reporting	6 Years
Date of resignation	Membership activities	6 Years**
Reason for resignation	Membership activities	6 Years
Financial details in relation to membership payments	Membership activities	6 Years
Application form (paper)	Membership Activities	3 Years
Interview notes (paper)	Membership activities	3 Years
Competition results	Membership activities	Released to Public Domain

*From the end of year on the year of resignation.

** to be kept in perpetuity as part of the historical records of the HBSA, subject to your rights (see Legitimate Interests above)

Personal Data to be processed for corresponding subscribers (including Institutional and Associated)

Data Description	Reason for processing	Retention Period *
Full Name	Membership activities	1 Year
Title	Membership activities	1 Year
Date of Birth (optional)	Membership activities	1 Year
Address	Membership activities	1 Year
Membership Grade	Membership activities	1 Year
Email Address	Membership activities	1 Year

Phone numbers	Membership activities	1 Year
Date of cancellation	Membership activities	1 Year
Reason for cancellation	Membership activities	1 Year
Financial details in relation to subscription payments	Membership activities	6 Years

*From the end of year on the year of resignation.

Personal Data to be processed for Guests of the HBSA

Data Description	Reason for processing	Retention Period *
Full Name	Legal Reporting	6 Years
Title	Legal Reporting	6 Years
Date of Birth	Legal Reporting	6 Years
Date of Attendance	Legal Reporting	6 Years
Nature of event	Legal Reporting	6 Years
Address	Legal Reporting	6 Years
FAC/SGC/SCC held	Legal Reporting	6 Years
Firearms used details	Legal Reporting	6 Years
Email Address	Membership activities	6 Years
Phone numbers	Membership activities	6 Years
Financial details in relation to payments	Membership activities	6 Years
Competition results	Membership activities	Released to public domain

*From the end of year on the year attendance.

V2.4 May 2021