

## SAGL Data Protection policy

### Background

The Data Protection Act 1998 applies to the **activity** of processing personal data, rather than to particular people or organisations. As SAGL collects and holds information about “identifiable living individuals”, it must comply with the Act.

### Policy Objectives

This policy has three objectives:

- To handle personal data in accordance with the Data Protection Act principles;
- To comply with the exemption that obviates the need for not-for-profit organisations to notify the Information Commissioner;
- To collect only the minimum amount of data needed.

### What data does SAGL collect, process, retain and where is it held?

This is detailed in full in Annex 1.

### How SAGL handles data in accordance with the Data Protection Principles

#### Principle 1

Information Commissioner's requirements	SAGL actions
Must have legitimate grounds for collecting and using the personal data	Records of members are needed for administration of the league and so that they can benefit from the league's insurance. Firearms Act declarations needed so that SAGL can demonstrate compliance with relevant law
Must not use the data in ways that have unjustified adverse effects on the individuals concerned	Records are needed for administration of the league only
Must be transparent about how you intend to use the data, and give individuals appropriate privacy notices when collecting their personal data	Note on the Registration Form explains where the data policy is available, together with a specific “opt-in” for use of photos
Must handle people's personal data only in ways they would reasonably expect	Records are used for administration of the league only
Must make sure you do not do anything unlawful with the data.	Records are used for administration of the league only

Conclusion: SAGL complies with Principle 1

## Principle 2

Must be clear from the outset about why you are collecting personal data and what you intend to do with it	Records of members are needed for administration of the league and so that they can benefit from the league's insurance
Must comply with the Act's fair processing requirements – including the duty to give privacy notices to individuals when collecting their personal data	Note on the Registration Form explains where the data policy is available, together with a specific “opt-in” for use of photos
Must comply with what the Act says about notifying the Information Commissioner	Considered under question 8 of the Notification Guide – see following section of this report
Must ensure that if you wish to use or disclose the personal data for any purpose that is additional to or different from the originally specified purpose, the new use or disclosure is fair	Not applicable as no other uses are undertaken or envisaged

Conclusion: SAGL complies with Principle 2

## Principle 3

Data should be adequate, relevant and not excessive	The information collected is the minimum needed to administer the league
Data should be accurate and, where necessary, kept up to date	Updated annually for existing members and when new members join. Details supplied by the individuals themselves
Data should be kept for no longer than necessary	Retention policy set out in Annex 1

Conclusion: SAGL complies with Principle 3

## Principle 4

Should take reasonable steps to ensure the accuracy of any personal data you obtain	Details supplied by the individuals themselves
Should ensure that the source of any personal data is clear	Details supplied by the individuals themselves
Should carefully consider any challenges to the accuracy of information	Would do so if this happened (never happened so far)
Should consider whether it is necessary to update the information	Updated annually for existing members and when new members join

Conclusion: SAGL complies with Principle 4

## Principle 5

Need to review the length of time you keep personal data	Retention policy set out in Annex 1
Need to consider the purpose or purposes you hold the information for in deciding whether (and for how long) to retain it	Reasons for holding and retention policy set out in Annex 1
Need to securely delete information that is no longer needed for this purpose or these purposes	As above
Need to update, archive or securely delete information if it goes out of date	As above

Conclusion: SAGL complies with Principle 5

## Principle 6

Members have a right of access to their personal data. Must comply with a subject access request within 40 calendar days of receiving it	Data will be made available if any member request it
Members have a right to object to processing that is likely to cause or is causing damage or distress	SAGL would respect any objections to information being processed
Members have a right to prevent processing for direct marketing	No data is supplied to any third party except names (only) to NSRA as part of affiliation. Neither SAGL nor NSRA undertake direct marketing
Members have a right to object to decisions being taken by automated means	Not applicable – no automated decisions taken
Members have a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed	SAGL would always correct any information notified as inaccurate
Members have a right to claim compensation for damages caused by a breach of the Act	SAGL attempts to ensure that the Act is not breached in any way

Conclusion: SAGL complies with Principle 6

## Principle 7

Need to design and organise your security to fit the nature of the personal data you hold and the harm that may result from a security breach	Security systems are simple and robust
Need to be clear about who in your organisation is responsible for ensuring information security	League Secretary and Webmaster only handle data

Need to make sure you have the right physical and technical security, backed up by robust policies and procedures and reliable, well-trained staff	Data either securely kept in written form or on one personal computer with secure access and regular back up
Need to be ready to respond to any breach of security swiftly and effectively	Confirmed

Conclusion: SAGL complies with Principle 7

### Principle 8

Data shall not be transferred to a country unless that country ensures an adequate level of protection	Principle 8 is not applicable, as SAGL does not transfer any data outside the UK
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### Does SAGL need to notify the Information Commissioner?

Information Commissioner guidance - Question 8 descriptions	SAGL actions
Your processing is only for the purposes of establishing or maintaining membership or support for a body or association not established or conducted for profit, or providing or administering activities for individuals who are either members of the body or association or have regular contact with it	Most processing is maintaining records that enable members to benefit from the league's insurance and demonstrate compliance with legal requirements.  Specific consent is obtained for inclusion of photographs on the website.
Your data subjects are restricted to the processing of those for whom personal information is necessary for this exempt purpose	As above
Your data classes are restricted to personal information that is necessary for this exempt purpose	As above
Your disclosures other than those made with the consent of the data subject are restricted to those third parties that are necessary for this exempt purpose	The only disclosure to a third party is to the NSRA as part of the affiliation process. This is needed so that SAGL benefits from their insurance arrangements.
The personal information is not kept after the relationship between you and the data subject ends, unless (and for so long as) it is necessary to do so for the exempt purpose	Reasons for holding and Retention Policy set out in Annex 1

Overall conclusion – SAGL is not required to notify the Information Commissioner.

### Annex 1 - Data collected and processed by SAGL

Data type	Reason for holding	Where the data is held				Retention policy RF = Registration Form; FB = Fixture Book; C = Computer; W = Website
		Regn. Form	Fixture Book	Computer	Website	
Name	Membership records; affiliation to NSRA to qualify for insurance cover	Yes	Yes for Officers and Captains	Yes	Yes	RF – held for year of validity plus 12 months W – Permanent C - Deleted when membership ceases FB – for relevant year only
Address	Membership record	Yes	Yes for Officers and Captains	Yes	No	RF – held for year of validity plus 12 months C - Deleted when membership ceases FB – for relevant year only
Date of birth	Only if under 18 - for Children’s Act applicability	Yes	No	No	No	RF – held for year of validity plus 12 months
Club	League records	Yes	No	Yes	Yes	Permanent
Type of membership	Membership record and support eligibility for insurance cover	Yes	No	Yes	No	RF – held for year of validity plus 12 months C - Deleted when membership ceases
Telephone	Enable SAGL to contact. Voluntary disclosure	Yes	No	No	Only for Officers	RF – held for year of validity plus 12 months
E-mail address	Enable SAGL to contact. Voluntary disclosure	Yes	Yes for Officers and Captains	No	Only for Officers	RF – held for year of validity plus 12 months FB – for relevant year only
Shooting statistics	League records	No	No	No	Yes	Permanent
Signature	Membership record	Yes	No	No	No	Held for year of registration plus 12 months
Firearms Act declaration	Demonstrate compliance with specific airgun law	Yes	No	No	No	Held for year of registration plus 12 months
Photograph	Enhance website and league presentations. Voluntary disclosure	No	No	No	Yes	Deleted when membership ceases

### **Notes concerning the data**

- Voluntary disclosure – means that members can withhold this data if they wish. The Registration Form contains a note to make this clear.
- League records – comprise name, club and shooting statistics only. These are kept on the website as an historical record that continues the long traditions of the league, which has been in existence for over 100years.
- The computer (C) and website (W) are independent – i.e. the records held on computer are not linked to, or available on, the website. The computer has secure, restricted access and all data is regularly backed-up.