



## Data Protection Policy and Procedures (UK GDPR)

<b>Responsible for review of policy</b>	<b>Responsible for review of procedures</b>
Chief Executive	Digital Operations Manager

Change History				
Version	Sections approved	By	Date of approval	Next review date
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## Data Protection Policy

Archery GB is fully committed to compliance with the data protection legislation and to maintaining the confidentiality of personal information.

The data protection legislation regulates how personal data (including Special Category Data) must be processed to protect the privacy of individuals and uphold their rights in relation to their personal data. This data protection policy and procedure (this '**Policy**') has been written in respect of the Data Protection Act 2018 and the UK GDPR (the retained EU law version of the General Data Protection Regulations ((EU) 2016/679) ('**UK GDPR**') together referred to as the 'data protection legislation'. For the purpose of this Policy 'Personal Data' means any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access.

Archery GB needs to collect and process certain types of information about its employees, members, suppliers and other third parties. This Policy applies to all Personal Data regardless of the media on which that Personal Data is stored or how it is collected, recorded and used.

Archery GB regards the lawful and correct handling of Personal Data as essential and therefore has put in place measures and procedures which are designed to ensure that all Personal Data is protected

### Personal Data Protection Principles

We adhere to the principles relating to processing of Personal Data set out in the UK GDPR which require Personal Data to be:

- processed fairly, lawfully and in a transparent manner;
- obtained for specified, explicit and lawful purposes;
- adequate, relevant and not excessive in relation to the purpose(s) for which it was processed;
- accurate and kept up-to-date;
- kept only for any as long as is necessary for the purpose(s) for which the Personal Data is processed;
- made available to data subjects to exercise certain rights in relation to their Personal Data;
- processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage; and
- not transferred to any country outside the UK or European Economic Area (EEA) unless the recipient country ensures an adequate level of protection or the appropriate safeguards are in place.

We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (accountability).

### Lawful Basis for Processing

Whenever Archery GB processes Personal Data there must be a valid lawful basis for that processing. There are 6 potentially applicable lawful bases for general processing of Personal Data and 10 lawful bases for processing Special Category Data. If Special Category Data is being processed, both a lawful basis for general processing and (where applicable) an additional condition for processing this type of data must be identified. The Appendix sets out the lawful bases for processing.

### **Archery GB will through appropriate management, strict application of criteria and controls:**

- fully observe the conditions regarding the fair collection and use of the Personal Data;
- meet its legal obligations to specify the purpose(s) for which the Personal Data is used;
- collect and process only that Personal Data which is required in order to fulfil operational needs or comply with legal requirements;
- ensure the quality of all Personal Data that is processed;
- apply strict checks to determine the length of time the Personal Data is held;
- ensure the rights of data subjects about whom the Personal Data relates to can be fully exercised under the data protection legislation which includes the right to be informed that processing is being undertaken, the right of access to Personal Data, the right to restrict processing in certain circumstances and the right to correct, rectify, object or erase Personal Data;
- ensure that appropriate technical and organisational security measures are in place to safeguard such Personal Data;
- ensure that no transfer of Personal Data outside the UK or EEA is done without the appropriate safeguards being put in place;
- treat people impartially and fairly irrespective of their age, religion, disability, gender, sexual orientation or ethnicity when dealing with data protection rights requests; and
- have in place clear procedures in managing and responding to requests for Personal Data.

### **In addition to the above, Archery GB will ensure that:**

- there is a member of staff with specific responsibility for Archery GB's compliance with the data protection legislation;
- all staff responsible for managing and handling Personal Data must understand that they are responsible, as indicated in their Contract of Employment, to follow good data protection practice;
- all staff managing and handling Personal Data are appropriately trained to do so;
- all staff managing and handling Personal Data are appropriately supervised;
- procedures are in place so that anybody wanting to make enquiries about how their Personal Data is handled, all staff understand what to do;
- all staff can deal with queries concerning Personal Data promptly and courteously;
- methods of handling Personal Data are clearly described;
- it monitors and reviews the way Personal Data is held, managed and used;
  
- all staff are aware that any breach of the rules and procedures relating to the data protection legislation may lead to disciplinary action; and
- this Policy forms part of the induction process for new staff members.

## **Procedures**

This section outlines the procedures that Archery GB will put in place to meet its legal obligations under the data protection legislation.

### **1 Transparency**

The UK GDPR requires a Controller to provide detailed, specific information to an individual depending on whether the Personal Data was collected directly from the data subject or from elsewhere. The information must be provided through an appropriate privacy notice which must be concise, transparent, intelligible, easily accessible, and in clear and plain language so that an individual can easily understand them.

When Personal Data is collected indirectly (for example, from a third party or publicly available source), we must provide the individual with all the information required by the UK GDPR as soon as

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possible after collecting or receiving the data. We must also check that the Personal Data was collected by the third party in accordance with the UK GDPR and on a basis which contemplates our proposed processing of that Personal Data.

### 2 Fair Processing

Archery GB will, as far as practicable, ensure that all individuals whose details we hold are aware of the way in which that Personal Data will be held, used and disclosed and the lawful basis or bases for retaining the Personal Data. Individuals will, where possible, be informed of the likely recipients of their Personal Data, whether the recipients are internal or external to Archery GB.

Processing within Archery GB will be fair and lawful. Individuals will not be misled as to the use(s) to which Archery GB will use their Personal Data. If an individual feels they have been deceived or misled as to the reason for which their Personal Data was collected, they should refer to the complaints procedure at the end of this Policy.

Archery GB will publish an external-facing privacy notice which details how individuals' data is collected, held and processed. This is available at <http://www.archerygb.org/privacy-policy/>. Updates may be necessary and when made will be published to website and the membership platform.

Collection forms requiring Personal Data will contain a copy of our privacy notice giving details of the likely use(s) of the Personal Data and, where Personal Data is collected in person or by telephone, the employee asking for the details will tell the individual how those details will be used. Individuals are free to ask why we want their Personal Data and how it will be processed.

If a individual's details are going to be used for "automated-decision making" (i.e. where a computer decides something based on a score or other information) the individual will be informed about this processing to provide them with an opportunity to object.

Should an individual's Personal Data need to be processed for a purpose that does not appear on Archery GB's privacy notice or a purpose that the individual has not previously been made aware of or could not reasonably be expected to realise it, the individual will be informed of the new purpose for processing.

### 3 Data Uses and Processes

Archery GB will not use or process Personal Data in any way that goes beyond the original purpose for processing or in any way that would constitute a breach of the data protection legislation. Any new purposes() introduced will, where appropriate, be notified to the individual and, if required by law, their consent will be sought.

Archery GB's registration/notification entry can be viewed on the Information Commissioner's Office's web page at [www.ico.gov.uk](http://www.ico.gov.uk) - registration number Z9279982.

All staff and or authorised agents processing Personal Data within or on behalf of Archery GB and will be told the limits of their authority in processing and (if necessary) disclosing it.

The overall management of Archery GB's data protection compliance is assigned to the Chief Executive of Archery GB who will ensure that:

- all purposes and disclosures are coordinated and consistent;
- all new purposes are documented and, where necessary, notified to the Information Commissioner's Office; and

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- all personal data breaches and other data protection infringements are investigated thoroughly and within the statutory timeframes.

Where a new process or system is being planned, the data protection team will be informed. There may then be a requirement to complete a Data Protection Impact Assessment (DPIA) to assess the risk(s) in carrying out the new process or employing the new system.

The UK GDPR restricts data transfers to countries outside the UK to ensure that the level of data protection afforded to individuals by the UK GDPR is not undermined. You may only transfer Personal Data outside the UK if one of the following conditions applies:

- the UK has issued regulations confirming that the country to which we transfer the Personal Data ensures an adequate level of protection for the data subject's rights and freedoms;
- appropriate safeguards are in place such as international data transfer agreements and addendums;
- the data subject has provided explicit consent to the proposed transfer after being informed of any potential risks; or
- the transfer is necessary for one of the other reasons set out in the UK GDPR including:
  - the performance of a contract between us and the data subject;
  - reasons of public interest;
  - to establish, exercise or defend legal claims;
  - to protect the vital interests of the data subject where the data subject is physically or legally incapable of giving consent; and
  - in some limited cases, for our legitimate interest.

### 4 Data Quality and Integrity

Archery GB will not collect Personal Data from individuals where that Personal Data is considered excessive or irrelevant in relation to the notified purpose(s) for processing. Any Personal Data collected will be adequate and relevant for the purpose(s) and where any Personal Data collected becomes (over time or by virtue of changed purposes) irrelevant or excessive, it will then be deleted.

Personal Data will only be held for as long as is necessary for the notified purpose(s), after which the details will be deleted. Where any Personal Data pertaining to individuals are stored for long-term archive or historical reasons and where it is necessary to retain the Personal Data within the records, it will be done in accordance with the data protection legislation. In many cases, Personal Data will be anonymised so that the individuals can no longer be identified.

You must not keep Personal Data in a form which permits the identification of the data subject for longer than needed for the legitimate business purpose or purposes for which we originally collected it including for the purpose of satisfying any legal, accounting or reporting requirements.

Archery GB will ensure, as far as it is practicable, that the Personal Data held is accurate and kept up-to-date, and it is the intention to check wherever possible the Personal Data that has been provided.

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Where possible, access will be given to the individuals so that they can manage their own Personal Data and update it where appropriate through membership platforms, for example Sport80.

Personal Data received from third parties (i.e. neither the individual concerned nor Archery GB) will indicate the source in collecting the Personal Data. Where an individual informs Archery GB of a change to their own circumstances, such as their home address, phone number or surname, their membership record(s) will be updated as soon as possible. Where the individual requests for their Personal Data to be changed or asks Archery GB to stop processing their Personal Data, if it is not possible to update their preferences immediately or where the accuracy or validity of the new Personal Data needs to be checked, a marker will be placed on the disputed record indicating the nature of the problem. Archery GB and the individual will attempt to reach an amicable agreement on the change. Where this is not possible, Archery GB's complaints procedure will be implemented.

### 5 Technical and Organisational Security

Archery GB has implemented appropriate technical and organisational measures to ensure compliance with the data protection principles as set out under UK GDPR. In particular, unauthorised staff and other individuals are prevented from gaining access to Personal Data.

Appropriate security measures are in place for visitors on Archery GB's premises. This includes being issued with a swipe card to access our offices. The general public visiting Archery GB's buildings should not feel that the measures are restrictive or oppressive; the measures are there to protect the Archery GB's data.

It is also important to stress the need to ensure that any Personal Data in transit, whether in electronic or paper/hard copy form, is kept secure.

Computer systems are installed with user-profile type password controls and, where necessary, audit and access trails to establish that each user is fully authorised. In addition, employees are fully informed about overall security procedures and the importance of their role within those procedures. Manual filing systems are held in secure locations and are accessed on a need-to-know basis only.

Security arrangements are reviewed on an annual basis or, if earlier, when an employee leaves Archery GB. All reported personal data breaches and potential weaknesses are investigated and, where necessary, further or alternative technical and organisational measures will be introduced to secure the Personal Data. Such reports are received by Archery GB who will liaise with the relevant internal team to resolve the personal data breach and/or potential weakness.

All staff are informed and frequently reminded about the limits of their authority on disclosing Personal Data, both inside and outside of Archery GB. Details will only be disclosed on a need-to-know basis. Where Personal Data needs to be shared outside of Archery GB, it will in general be done with the individual's consent except where this is not possible or where it is required by law, allowed under Data Protection Act exemptions (such as crime prevention/detection, to prevent injury, etc) or where it is in the individual's vital interests. Any unauthorised disclosure will be dealt with under Archery GB's disciplinary procedures.

Redundant Personal Data will be destroyed in accordance with Archery GB's "procedure for disposal of confidential waste". In general, paper waste is shredded and magnetic media (disks, tapes, etc) are either electronically "wiped" or physically destroyed beyond recovery.

## 6 Subject Access Requests and Data Subject's Rights

Any individual whose Personal Data is held/processed by Archery GB has a right to receive a copy of their Personal Data. There are a few exceptions to this rule, for example if the individual's Personal Data also includes Personal Data pertaining to third parties, but most individuals will be entitled to receive a copy of their Personal Data.

Archery GB will attempt to reply to subject access requests as quickly as possible but in any event within one month subject to the data protection legislation.

A subject access request can be submitted to [gdpr@archerygb.org](mailto:gdpr@archerygb.org), although this is not mandatory. This will ensure that Archery GB has the required information to be able to conduct a reasonable data search and to fulfil the request. In some cases, further information may be required from the individual which may pause the time and extend the deadline to respond.

In addition to the right of access set out above, a data subject has other rights when it comes to how we handle their Personal Data. These include rights to:

- withdraw consent to processing at any time;
- receive certain information about Archery GB's processing activities;
- prevent our use of their Personal Data for direct marketing purposes;
- ask us to erase Personal Data if it is no longer necessary in relation to the purposes for which it was collected or processed or to rectify inaccurate data or to complete incomplete data;
- restrict processing in specific circumstances;
- challenge processing which has been justified on the basis of our legitimate interests or in the public interest;
- request a copy of an agreement under which Personal Data is transferred outside of the UK;
- object to decisions based solely on Automated Processing, including profiling (ADM);
- prevent processing that is likely to cause damage or distress to the data subject or anyone else;
- be notified of a personal data breach which is likely to result in high risk to their rights and freedoms;
- make a complaint to the supervisory authority; and
- in limited circumstances, ask for their Personal Data to be transferred to a third party in a structured, commonly used and machine-readable format.

## 7 Further Information, Enquiries and Complaints

Archery GB's Chief Executive is the first point of contact for any queries in relation to this Policy. The Chief Executive will be responsible for dealing with all internal and external enquiries. Where possible, requests for detailed information should be put in writing.

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**All** complaints should be written, dated and should include details of the complainant as well as a detailed account of the nature of the problem. Archery GB will attempt to complete its internal investigations within 10 working days and in any case the individual will receive an acknowledgement of the complaint as soon as possible.

Complaints should be sent to:

Chief Executive – Private and Confidential  
Archery GB  
Lilleshall National Sports Centre  
Nr Newport  
Shropshire  
TF10 9AT

### **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:**



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- (a) the individual 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 individual is a party;
- (c) processing is necessary for compliance with a legal obligation to which the Archery GB is subject;
- (d) processing is necessary in order to protect the vital interests of the individual;
- (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 Archery GB; and
- (f) processing is necessary for the purposes of the legitimate interests pursued by Archery GB or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the individual which requires the protection of Personal Data, in particular where the individual is a child. (This does not apply to processing carried out by public authorities, such as Universities, in the performance of their public tasks).

### **9 legal bases for processing Special Category Personal Data:**

- (a) the individual has given explicit consent to the processing of their Personal Data for one or more specified purposes;
- (b) processing is necessary for the purposes of carrying out Archery GB's obligations and rights in the field of employment and social security (subject to the Data Protection Act 2018);
- (c) processing is necessary to protect the vital interests of the individual where the individual is physically or legally incapable of giving consent;
- (d) processing is carried out in the course of Archery GB's legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to individuals who have regular contact with the relevant organisation in connection with its purposes and that the Personal Data is not disclosed outside that organisation without the consent of the individual;
- (e) processing relates to Personal Data which is manifestly made public by the individual;
- (f) processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- (g) processing is necessary for reasons of substantial public interest which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the individual;
- (h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services pursuant to a contract with a health professional and subject to safeguards;
- (i) processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices; and
- (j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the individual.

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