

## **National Rifle Association (NRA) Privacy Policy**

### **About this policy**

This privacy policy explains how and why the National Rifle Association including the National Shooting Centre for this purpose (NRA), collect personal information, use it and keep it. It also explains your rights in relation to it.

We will collect, use and store personal data, as described in this Privacy Policy when people engage in activities of the NRA. This includes members, visitors, guests and others using the facilities and services of the NRA. For purpose of the General Data Protection Regulation (GDPR), we are considered the Data Controller of this personal data and we may make use of third-party services, print and mailing houses and online backup/storage facilities.

We may amend this policy from time to time without prior notice. You are advised to check our website regularly for any amendments at [www.NRA.org.uk](http://www.NRA.org.uk).

We will only share your personal data with any third parties as outlined below. The data will be retained in compliance with the GDPR and other applicable UK law. Further details on GDPR may be found at the website for the UK Information Commissioner ([ico.org.uk](http://ico.org.uk)).

### **Information we collect**

The personal data you provide to us, and/or we collect from you:

- Name, address, date of birth, gender
- Contact details, including telephone numbers and email address
- Financial information, including bank details and credit/debit cards (although we do not retain complete payment card information)
- Criminal convictions, health details and medical history
- Information from firearms and shotgun certificates
- Participation in competitions and scores
- Attendance at events
- Club affiliation
- Gift aid declaration
- Photographs/videos both CCTV and of sporting competitions and events

### **How we collect information about you**

The personal information you provide to us, we collect from online submissions and paper documents in the following circumstances, among others:

- When you apply for membership
- When you renew your membership
- When you purchase ammunition or other goods or rent firearms from us
- When you purchase insurance through us or make a claim on that insurance
- When you register to receive information from us
- When you interact with us, respond to communications or surveys
- When you enter competitions
- When you attend training courses
- When you book ranges

- When you attend a corporate day or a guest day event
- When you request accommodation
- When you make enquiries or raise concerns with us
- When you enter into license, leases or contracts with us

### **Use and sharing of personal information**

We use personal information for the purposes of:

- Administering your membership in the NRA
- Providing you with insurance cover and related services
- Using payment details to process payments relating to your membership, including fees, premiums, renewals of membership
- Communicating with you about your membership (including renewals), policies, and claims, and responding to enquiries
- Supply you with our magazine and other communications
- Administer Gift Aid
- Promoting our competitions, events and the sport generally
- Promoting marksmanship
- Issuing Shooter Certification Cards (SCC)

Your personal data:

- Will be used to notify the police when you apply to join the NRA club
- Will be used to notify the police, the Home Office or other government agencies for any other appropriate notifications required by law
- Will be used for the purposes of organising and operating the competitions and events and competition entries/results may be published in our magazine, on our website or other public media
- May be shared with another National Governing Body or a Home Office Approved Club
- May be published on our website or in our magazine in connection with disciplinary actions where appropriate
- Will be shared with insurers and with third party service providers for the purpose of handling insurance claims, including our claims team, solicitors, medical agencies and Police (explicit consent having been given to us by you to act on your behalf)
- Will be shared with third party service providers who support the operation of our organisation and services, such as IT and financial service providers, mailing houses etc.
- Photographs/videos made during events or competitions may be published in our magazine, on our website or on social media sites (see special statement about CCTV images)
- Will not otherwise be provided to third parties without your consent

### **Lawful Basis**

Our legal bases for processing your data are:

- **Contract:** by agreeing to be a member, using our services, such as certification as a NRA-qualified RCO or issuance of an SCC, making armoury purchases or using our ranges, using the insurance cover there is a contract in each instance (written or implied) between the NRA and the individual.

- Legal Obligation: This applies to processing personal data that is disclosed to the police and other legal requests (for example, if an incident is recorded on CCTV and is reported to the police)
- Legitimate Interest: our legitimate interest is upholding and promoting the charitable purposes of the NRA through its membership and affiliated member clubs as well as the legitimate business interests of the NRA in supporting such purposes and managing those in a financially sustainable manner. We are committed to promoting all forms of marksmanship in a safe, enjoyable and secure manner.
- Consent: As part of your membership, you are asked to consent to the communications and services you wish to receive from the NRA. *Also, when entering competitions or attending events, you will be asked to consent to using your images for use in publicity related materials. You may withdraw this consent at any time but once published your image will enter the public domain.* This does not apply to membership card photographs or SCC.

### **Your Rights**

You have the rights to the following:

- To be provided with information about how your personal data is processed (this is the purpose of this Policy together with any consents provided)
- To access your personal data (you may request a copy of your data)
- To have your personal data corrected
- To have your personal data erased in certain circumstances
- To object to or restrict how your personal data is processed in certain circumstances
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### **How long we keep your information**

- We will keep your information at least as long as you remain a member of the NRA, a NRA-qualified RCO or hold an NRA issued SCC.
- We may keep your information for up to 7 years after membership, your RCO certification or SCC expires but may keep it longer for reasons of legal and civil actions or other ongoing case management.
- All other information we may keep up to the statutory period contained in the guidelines which generally is up to 6 years.
- In certain circumstances, such as a claim, information may be held longer for the purposes of processing existing or future claims.
- Data retention periods are subject to change without further notice as a result of changes to associated law or regulation.
- Data, such as competition results, may be published and therefore released to public domain
- Names and scores may be kept indefinitely for reasons of historical significance

### **How we protect your data?**

- We may hold your data in both paper form and on an electronic database
- All electronic data will be held **on computers and servers, in the cloud and offsite backups. Our computers and servers are password protected, our cloud based storage is secured with appropriate levels of encryption and our backups are secured offsite.**

- Paper copies are kept in locked cabinets in locked offices
- We use a recognised online secure payment system for online payments
- The third party service providers who support our operations, such as IT and mailing services, are either located in the European Economic Area or in a country that has been approved by the European Commission as providing an adequate level of protection for personal information and we have entered into contracts for these services that provide requiring that the service provider to safeguard personal information in accordance with European Commission guidelines In the unlikely event of a breach of the security of the data we will notify you promptly

#### **Request to see your personal information and contacting us**

We have appointed a data protection officer who will be the point of contact for data privacy related matters who can be reached at [dataprotectionofficer@nra.org.uk](mailto:dataprotectionofficer@nra.org.uk) or by calling 01483 797777 and ask for the Data Protection Officer (DPO). If you wish to know what personal data the NRA holds or have any other request relating to the personal data the NRA holds, please contact the DPO. We will respond within 1 month following receipt of your request unless your request is very complex in which case we will inform you if this is the case. We may take steps to confirm your identity before responding to your request.

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.

Each individual member is responsible for keeping the NRA informed of changes to their data (e.g. address/telephone number etc.) and this is updated at least once a year at renewal and you are at that time authorising the NRA to hold such data on file. Such changes should be notified to the membership department by emailing: [membership@nra.org.uk](mailto:membership@nra.org.uk) or calling 01483 797777 and asking for the membership department.

#### **CCTV Images**

The NRA is registered with the ICO as an organisation that uses CCTV:

- CCTV is used to record activities throughout the NRA site in the interests of supervision, safety and crime prevention.
- For these reasons the information processed may include visual images, personal appearance and behaviours. This information may be about members, members of the public, employees, and those inside, entering or in the immediate vicinity of the area under surveillance.
- When necessary or required this information is shared with the data subjects themselves, employees, agents, service providers, police forces, security organisations and persons making enquiry.
- All images are stored securely onsite in (the camera system memory or secure server kept in a locked server room and access is password protected)/ The images/data are stored for approximately 1 month and then are overwritten. This data is not backed up.
- Any complaints which rely on this surveillance about theft/bullying/abuse etc. must therefore be made within 1 month of the incident otherwise the images will have been overwritten.

## **Affiliated Clubs and Issuance of SCCs**

Information received from Affiliated Clubs will be treated in the same manner as information received from individuals under this Policy.

The NRA issues Shooter Certification Cards to enable NRA members and members of Affiliated Clubs to shoot at Bisley and on MoD military ranges. The primary reason underpinning SCCs is to ensure that shooting under the auspices of the NRA is conducted safely by / supervised by duly competent shooters. SCCs are, at present, mandatory for shooting on NRA and MoD ranges. In practical terms our range staff at Bisley (and MoD staff on military ranges) should be able to ask every single unsupervised shooter on the point for an NRA SCC that confirms competency for the type of firearm being used (or the same from the shooter supervising a probationer, uncertified shooter or guest). For certainty of identity of the individual receiving an NRA SCC, we are requiring individuals whether as members of the NRA or through an Affiliated Club, to provide their name, address, email address, date of birth and photograph. Only the name and photograph will be printed on the SCC.

Information received from Affiliated Clubs for the purpose of issuing SCCs through the Affiliated Clubs to their members will be held solely for the purpose of issuing and administering the SCCs:

- We will only contact an individual SCC holder directly should his or her Club's affiliation ceases or is suspended, or we need to suspend/cancel an individual's SCC
- We ask that each Affiliated Club notify us should an individual cease being a member of the Club in order to cancel such individual's SCC
- We will respond to inquiries and requests from Affiliated Club's in respect of their individual member SCC holders as provided above
- We will respond directly to inquiries and requests from individual Affiliated Club SCC holders as provided above but will also inform his or her Club of the inquiry and the response

**8<sup>th</sup> April 2019**