



MLAGB

Muzzle Loaders' Association of Great Britain

Data Protection Policy – Compliance under the General Data Protection Regulations (GDPR)

Introduction

The Muzzle Loaders' Association of Great Britain (MLAGB) was formed in 1952 and is the Governing Body for muzzle loading within the United Kingdom. Its objectives are to encourage an interest in muzzle loading firearms, to promote, regulate and safeguard their use and to preserve their freedom of collection.

This not-for-profit association, run by volunteers, is under the same obligations with respect to members' data as one of the major companies for whom data is a commodity and source of profit.

To run the Association, it is necessary to maintain limited data relating to each member. This is to facilitate collection of membership fees, distribution of membership cards and the Association's journal, 'Black Powder' and in the running of meetings, events, competitions and training organised by the Association or, where appropriate the Muzzle Loaders Association International Confederation (MLAIC).

Our commitment

We are committed to the protection of the rights of individuals whose personal data we collect and process. We have developed this policy so we can describe in simple terms how we do this in line with all relevant laws and regulations, including the General Data Protection Regulation (GDPR). This policy has been made freely available, so all interested parties can easily understand how we protect the data under our care. Our approach to managing personal data is reviewed every two years as from 1st June 2018 to ensure it meets with the appropriate laws and regulations and to ensure we are satisfied it provides adequate protection to personal data.

Our Privacy Notice lays out the personal data we will collect and for what purpose:

- We only ever collect the minimum required to achieve that purpose. We will not use personal data obtained for a specified purpose in any other way than that declared in our Privacy Notice and/or consented to by the owner of said data.
- Before we process personal data, we will always identify a lawful basis for doing so and we will provide clear, understandable and accessible information (e.g. a privacy notice displayed on our website) to help ensure all interested parties are as informed as possible and our processing of personal data is both fair and transparent.
- We will only retain data for as long as is necessary or for as long as you remain a member of the Association. The rights of Data Subjects, as defined below and in our Privacy Notice, regarding the processing of personal data are fully supported at all times.

The scope of this policy

This policy applies to all processing of personal data, including but not limited to processing personal data of:

- Existing and potential members of the Association
- Shooters who are not members but who shoot under Section 21 of the Firearms Act 1968
- Members of the Association who are collectors of antique firearms and memorabilia
- Partner organisation personal data

This policy applies to all our members, partner organisations and any third parties working with us or on behalf of the MLAGB, who will be expected to read, understand and adhere to this policy. No third party may access personal data held by the MLAGB without having the appropriate confidentiality/data processing agreement in place.

Only those office holders designated to do so may interrogate data held by these third parties. All such interactions must be recorded by that third party.

Accuracy of Personal Data

We will make every reasonable effort to ensure the personal data we or our membership administrator holds is accurate, including clear instructions for data entry, collecting minimal data to reduce the overall potential for error.

Where inaccuracies are identified, or changes required, members have the right to ask for this data to be changed. Please see "your rights under GDPR" referred to later in this document.

Security of Personal Data

We will do everything we can to secure personal data. The Council of Management, Discipline Secretaries, Branch/Club Secretaries, Membership Administrator and Website Managers are responsible for ensuring that the personal data they hold is kept securely and is not disclosed to any third party unless that third party has been specifically authorised by us to receive that information and has entered into an appropriate data processing/confidentiality agreement. We will risk assess the processing of personal data every two years (as from 1st June 2018), or when a new requirement is identified. These risk assessments are carried out to minimise both the possibility and impact of a data security breach and therefore minimises the threat to individual's privacy. The results of these assessments inform the security arrangements we put in place to protect personal data, several which are listed below:

- Password protection
- Virus checking software
- Encryption of devices if applicable
- Storing of paper-based data in lockable cabinets
- Making regular backups of personal data

Data Retention

Retention periods for personal data relating to specific purposes are laid out in our Privacy Notice and have been assessed based on perceived need.

Any exceptions must be documented clearly and agreed by the Data Protection Lead.

Disclosure to Third Parties

We do not sell data to third parties, however in order to provide the appropriate level of service we may need to share some personal data with third parties (i.e. Goodform as our membership administrator, relevant Police Authority or the Home Office to comply with Firearms and Explosives Legislation, Website managers, Insurance Brokers). These arrangements are summarised in Appendix A.

This sharing will only be for the specific purposes agreed and will be carried out under the appropriate data processing/confidentiality agreements.

How we demonstrate our compliance with the GDPR

We aim to be as effective and transparent as possible in how we manage personal data. We have documented and implemented this policy along with key supporting procedures, so our approach is clear to interested parties.

Members Rights under the GDPR

You have the right to:

- Request a copy of the data that we hold relating to you.
- Correct the data that we hold about you that is inaccurate or incomplete.
- Ask for the data we hold about you to be deleted.
- Restrict the processing of your personal data.
- Data portability – you have the right to have the data we hold about you transferred to another organisation.
- You have the right to object to certain types of processing such as direct marketing.
- Not be subjected to automatic decision-making including profiling.
- Right to judicial review: In the event that the MLAGB refuses your request under rights of access, we will provide you with a reason as to why. If you are not satisfied with this, you have the right to complain to the relevant supervisory authority (see detail below on Complaints).
- Where you have consented to processing of your personal data, you have the right to remove this consent at any time.

The Association undertakes to respond to requests under Subject Access Rights (SAR) within one month. Requests should be made to the Data Protection Lead in the first instance. This request can be made via emailing data@mlagb.com or by writing to MLAGB, PO Box 58, Etchingam, TN19 7XH.

Any breach in data security shall be immediately notified to the Data Protection Lead.

If any officer or member of the Association becomes aware of a potential weakness in data protection, then they should inform the Data Protection Lead at the first opportunity by emailing data@mlagb.com.

Key roles and responsibilities

Members of the Council of Management, Discipline Secretaries and Branch/Club Secretaries throughout the MLAGB are responsible for developing and encouraging good information handling practices.

Those who have a specific responsibility to oversee management of personal data are responsible for making sure this is done so in line with this policy and all supporting procedures.

Appendix A

Summary of data that may be held for or on behalf of the MLAGB

- The nature of the Association means that data is held, where required, under Firearms and Explosives Legislation.
- **Membership application and renewal**
Membership data may be accessed by our membership administrator (currently Goodform Ltd, 7 Olympus Court, Tachbrook Park, Warwick, CV34 6RZ).
- **Wedgnoock Rifle & Pistol Club (WRPC)**
Membership Data collected for the WRPC is maintained by the Hon. Secretary of the WRPC and Goodform Ltd. WRPC collect, store and use data which is a legal requirement of the Home Office.
- **Shooters record sheets**
Data for members who use the Wedgnoock Shooting Range as their Home Office Approved club for reporting purposes will be shared with the appropriate Police Authority as required. This data is supplied in written form and is kept for 6 years as required by the Home Office, after which it is securely destroyed.
- **Wedgnoock range usage sheets**
Data (name and details of all weapons used on all occasions) must be obtained and retained for 6 years and made available to anyone authorised to inspect them by the Home Office.
- **MLAGB Insurance**
Data required to resolve any insurance queries or claims.
- **Competition entry forms**
Entry forms for rifle, musket, cannon and pistol events are completed by competitors in advance of the competition.

Entry forms are not required for shotgun competitions, however the option to opt out of the publication of results or photographs will be obtained from competitors and recorded for each event.
- **International Events/Competitions**
As a national governing body, the MLAGB selects teams to compete in international competitions. The incumbent team captain and/or shooting discipline secretary collate data (entry forms) relating to the Great Britain team. This data is passed to the Muzzle Loaders Association International Confederation (MLAIC) or to other shooting bodies or federations organising the international event.
- **MLAGB website**
 - . SSL Certificate
 - . Policy Pages
 - . Cookie Banner
 - . Members Area

- **MLAGB Forum**
- **MLAGB Committee Email System**
 - . Email forwarding system
- **MLAGB on-line shop**
 - . Paypal
 - . Postal
- **MLAGB newsletter/electronic bulletin**
- **Game Fairs, Shows and Events**

Representatives of the MLAGB regularly attend Game Fairs and other shooting shows/ events. Section 21 of the Firearms Act 1968 (as amended), prohibits persons with certain criminal records from handling firearms. In order to reasonably demonstrate that we are compliant with the law as shoot organisers and to comply with MLAGB Insurance requirements, we require persons wishing to shoot to place their name, post code and signature on our Section 21 declaration form. These forms will be securely held for not more than 12 months, whereupon they will be destroyed.
- **Clubs/Branches**

Club or Branch secretaries may, with permission, for example, hold details of branch members as a form of communication for the purpose of writing to or notifying members about key dates and events or as contact details in case of an emergency.
- **Training Courses**

Application forms are completed to register for training courses.
A register is compiled from the application form.
At the end of the course, for all those attending, who are already NRA RCO's, who pass the course, the Training Officer notifies the NRA, so they can update the attendees NRA RCO certification.