



## **Glasgow Archers Data Protection Policy and Procedures (UK GDPR)**

<b>Responsible for review of policy and procedures</b>
Data Protection Officer

<b>Revision History</b>			
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# Data Protection Policy

Glasgow Archers 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.

Glasgow Archers needs to collect certain types of information about its members. 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.

Glasgow Archers 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 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.

## Glasgow Archers 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 fulfill 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.
- Have in place clear procedures in managing and responding to requests for Personal Data.

**In addition to the above, Glasgow Archers will ensure that:**

- There is a trustee of the board with specific responsibility for Glasgow Archers compliance with the data protection legislation.
- All board members responsible for managing and handling Personal Data must understand that they are responsible to follow good data protection practice.
- Procedures are in place so that anybody wanting to make enquiries about how their Personal Data is handled is available.
- All trustees are aware that any breach of the rules and procedures relating to the data protection legislation may lead to disciplinary action.

## Procedures

This section outlines the procedures that Glasgow Archers 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 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

Glasgow Archers 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 Glasgow Archers.

Processing within Glasgow Archers will be fair and lawful. Individuals will not be misled as to the use(s) to which Glasgow Archers will use their Personal Data.

Should an individual's Personal Data need to be processed for 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**

Glasgow Archers 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.

The overall management of Glasgow Archers's data protection compliance is assigned to a trustee of the board who will ensure that:

- All purposes and disclosures are coordinated and consistent.
- All new purposes are documented.
- All personal data breaches and other data protection infringements are investigated thoroughly.

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.
- The data subject has provided explicit consent to the proposed transfer after being informed of any potential risks.
- The transfer is necessary for one of the other reasons set out in the UK GDPR.

### **4 Data Quality and Integrity**

Glasgow Archers 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.

Glasgow Archers 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.

## **5 Security**

All reported personal data breaches and potential weaknesses are investigated and, where necessary, further or alternative measures will be introduced to secure the Personal Data.

Details will only be disclosed on a need-to-know basis. Where Personal Data needs to be shared outside of Glasgow Archers, 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.

Redundant Personal Data will be destroyed in accordance. In general, paper waste is shredded and electronic records are deleted.

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

Any individual whose Personal Data is held by Glasgow Archers has a right to receive a copy of their Personal Data.

Glasgow Archers will reply to requests as quickly as possible subject to the data protection legislation.

In addition to the right of access, individuals have other rights when it comes to how we handle their Personal Data. These include rights to:

- Prevent our use of their Personal Data for media 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.
- Be notified of a personal data breach which is likely to result in high risk to their rights and freedoms.

## **7 Further Information, Enquiries and Complaints**

Glasgow Archers Data Protection Officer is the first point of contact for any queries in relation to this Policy. Where possible, requests for detailed information should be put in writing.

Any complaints should be written, dated, and should include details of the complainant as well as a detailed account of the nature of the problem. Glasgow Archers will complete its internal investigations and in any case the individual will receive an acknowledgement of the complaint as soon as possible.

## Lawful Bases for Processing Data

**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:**

- (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 compliance with a legal obligation to which the Glasgow Archers is subject.
- (c) Processing is necessary in order to protect the vital interests of the individual.
- (d) Processing is necessary for the purposes of the legitimate interests pursued by Glasgow Archers 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.

**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 Glasgow Archers's obligations and rights 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 relates to Personal Data which is manifestly made public by the individual.
- (e) Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
- (f) 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.
- (g) 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.