

NFAS Privacy Policy

Date document implemented	25 May 2018
Author/s	Juliet Harrison
Review period	3 years
Date last reviewed	09 January 2024
Version	2

Contents

1.	Important information and who we are	4
	Purpose of this privacy policy	4
	Controller	4
	Contact details	4
	Changes to the privacy policy and your duty to inform us of changes.....	5
	Third-party links	5
2.	Data we collect about you	5
	Information you give us	5
	Information we collect about you	5
3.	How your personal data is collected	6
	Direct interactions	6
	Automated technologies or interactions.....	6
4.	How we use your personal data	6
	Information you give to us.....	6
	Information we collect about you	7
	Purposes for which we will use your personal data	7
	Communications.....	8
	Opting Out.....	9
	Cookies.....	9
	Change of purpose	9
5.	Disclosure of your information	9
6.	International transfers	9
7.	Data security	10
8.	Data retention.....	10
	How long will you use my personal data for?	10
9.	Your legal rights	10
	What we may need from you.....	11
	Time limit to respond.....	11
10.	Glossary	11
11.	Third parties	11
	Internal Third Parties	12
	External Third Parties	12
12.	Your legal rights	12

NFAS ("We") are committed to protecting and respecting your privacy.

This policy (together with our Website Terms of Use and any other documents referred to within it) sets out the basis on which any personal data we collect from you will be processed by us and how the law protects you. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

You can download a version of the policy from the website. Please also use the glossary to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how NFAS collects and processes your personal data in person, in writing, by telephone, by email, or throughout your use of our website, including any data you may provide via our website when you fill out any form, sign up to our newsletter, use our services, take part in a competition, or call us using the numbers that appear on the website. References in this policy to our website including any associated NFAS online portal, platform, or app.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Controller

The NFAS is also known as the National Field Archery Society and NFAS Ltd. This privacy policy is issued on behalf of the NFAS names so when we mention NFAS, "we", "us", or "our" in this privacy policy, we are referring to the NFAS in all known names. The NFAS will be the controller for your data when you use our services and is responsible for this website.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

Our full details are:

Full name of legal entity:	National Field Archery Society
Company number:	05065370
Name of DPO:	Juliet Harrison
Email address:	dpo@nfas.net
Telephone number:	07563 494876
Registered address:	3 Sangora, St Ann's Chapel, Gunnislake PL18 9HG

Deputy DPO:	Lynne Harrison
Email address:	membership@nfas.net
Telephone number:	07858 667367

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

This version was last updated on 09 January 2024 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your membership with the NFAS.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notices of every website you visit.

2. Data we collect about you

We will collect and process the following data about you:

Information you give us

This is information about you that you give us by filling forms on paper or by corresponding with us in person, in writing, by phone, email or via our website or social media platforms. It includes information you provide when you visit our site, register to use our site, subscribe to become a member, participate in discussion boards or other social media functions on our site or digital platforms, enter a competition, promotion or survey, and when you report a problem with our site. The information you give us may include your name, user name or similar identifier, title, date of birth and gender, address, email address and phone number, DBS number, learning aptitude, and payment information.

Information we collect about you

On each of your visits to our site we may automatically collect the following information:

- Technical information, including the Internet Protocol (IP) addresses used to connect your computer to the internet, browser type and version, time zone setting and location, browser plug-in types and version, operating system and platform and other technology on the devices you use to access this website.
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse to and away from the page, and any phone number used to call us.
- We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in laws this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect

aggregated data with your personal data so that it can be directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

- We may be provided with Special Categories of personal data about you strictly on the basis that you have given your explicit consent for this information to be shared with us. Typically, this will include details relating to your health which will form part of our decision-making process when deciding on, but not limited to, special dispensations for shooting, for example. We ask for this information to ensure that we undertake a considered and sensible practice. We may also collect information about criminal convictions and offences if related to a weapon based conviction.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we will not be able to administer or renew your membership.

3. How your personal data is collected

We use different methods to collect data from and about you, including through:

Direct interactions

You may give us your Identity, Contact, and Financial Data by filling in forms or by corresponding with us in person, by post, phone, email, online or otherwise. This includes personal data you provide when you:

- enquire about the services by phone, in person, via email or online;
- apply to be a member;
- register on our website;
- subscribe to our newsletter;
- fill out a website form; or
- give us some feedback.

Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookies Policy for further details.

4. How we use your personal data

We will only use your personal data where the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Information you give to us

We will use this information:

- to notify you about changes to our company and the service provided to you, including membership, society and archery related topics;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- where we need to comply with legal or regulatory obligations.

Information we collect about you

We will use this information:

- to administer the society and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so and if so available to you;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a member	Identity Contact Gender Age	Performance of a contract with you
To process and deliver our service including such as managing payments	Identity Contact Financial	Performance of a contract with you

To develop, manage and maintain our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	Identity Contact	Performance of a contract with you
To administer and protect our society, website, Apps, and other online platforms (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	(a) Necessary for our legitimate interests (for running the society, provision of administration and IT services, network security, to prevent fraud and in the context of a society reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To process and deliver additional services to members including: (a) Progressing Assistant Coach and Coach training and registration; (b) Processing DBS applications	Identity Contact Gender Age	Performance of a contract with you
To deliver the newsletter and other necessary communications to members	Identity Contact	Performance of a contract with you. Disseminating updated rule book after rule and regulation changes

Communications

We communicate with our members and contacts via email, telephone and post. The type of communication includes:

- **Operational Communications**

We communicate with members regarding their membership or other contractual business with the NFAS as required.

You will receive a newsletter from us if you have requested this through your yearly membership renewal or by contacting the Membership Secretary directly. If you have not expressed an interest in receiving a paper copy of the newsletter then you will be considered as opting out.

- **Society Communications**

We communicate with our members and other contact other important information about NFAS such as new rules and regulations as required.

If there is anything you do not understand please contact us.

Opting Out

You can ask us to stop sending you the newsletter at any time by e-mailing membership@nfas.net or calling the Membership Secretary on 07858 667367.

Where you opt out of receiving the newsletter this will not apply to personal data provided to us because of membership requirements and we will continue to contact you regarding the membership you have with the NFAS.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies Policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

Please note that we may process your personal data where this is required or permitted by law, without your knowledge or consent, in compliance with the above rules.

5. Disclosure of your information

You agree that we have the right to share your personal information with:

- Any member of the NFAS Committee;
- Selected third parties including:
 - the Open College Network if applying to become a Coach or Coach Trainer;
 - our chosen newsletter distribution providers such as mailing houses and printers;
 - our chosen supplier of DBS certification.

We will disclose your personal information to third parties:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Use or to protect the rights, property, or safety of our members or others.

6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those Committee Members and other third parties who have a need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

All information you provide to us is stored securely. Any payment transactions are completed by Stripe over a secure, encrypted connection. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve through other means, and the applicable legal requirements. In some circumstances you can ask us to delete your data: see Request Erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Further details about these rights can be found at the end of this policy.

- **Request access to your personal data**
- **Request correction of your personal data**
- **Request erasure of your personal data**
- **Object to processing of your personal data**
- **Request restriction of processing your personal data**

- **Request transfer of your personal data**
- **Right to withdraw consent**

If you wish to exercise any of the rights set out above, please contact the DPO or the Deputy DPO by using the contact details set out at the start of this policy.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request in order to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

Legitimate Interest means the interest of our society in growing, conducting and managing our society to enable us to give you the best and secure service and keep you informed. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Consent means you have given clear consent for us to process your personal data for newsletter communications.

11. Third parties

Internal Third Parties

Other Committee Members in the NFAS acting as joint controllers or processors and who are based in the United Kingdom.

External Third Parties

- Professional advisors acting as processors or joining controllers including lawyers, and insurers based in the United Kingdom who provide their services to us.
- Insurance companies based in the United Kingdom for the purpose of insuring our society and its members.
- Our chosen distribution providers such as mailing houses and printers.

12. Your legal rights

You have the right to:

- **Request access to your personal data**

Commonly known as a “data subject access request”. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction of your personal data**

That we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Request erasure of your personal data**

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information lawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing of your personal data**

Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for the newsletter purposes. In some cases, we may demonstrate that we have compelling

legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing your personal data**

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if when no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request transfer of your personal data**

To you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Right to withdraw consent**

At any time if we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.