

## **PENDLE AND SAMLESBURY PRIVACY NOTICE**

### **What this privacy notices covers**

Pendle and Samlesbury is committed to protecting your personal information. In this notice, references to 'we' or 'us' means Pendle and Samlesbury. This notice explains how we collect and use the personal information about you.

### **Who we are**

Pendle and Samlesbury is operated and administered by the Bowmen of Pendle and Samlesbury Ltd a private company limited by **guarantee without share capital** and its registered company number is 06288357.

Pendle and Samlesbury operates the website [www.pendleandsamlesbury.co.uk](http://www.pendleandsamlesbury.co.uk) (the "Website").

Pendle and Samlesbury is a data controller under the data protection rules and our Data Protection Officer is our Secretary contactable at Pendle and Samlesbury, 1 Old Hall Lane, Charnock Richard Chorley PR7 5LB.

### **Information we gather.**

Pendle and Samlesbury gathers certain information about you. Information about you is also used by our affiliated entities, namely local archery clubs, county and regional associations.

We collect information in the following ways:

### **Information you give us.**

When you become a member, volunteer or customer of Pendle and Samlesbury you will give us information. You may also give us information when using our Website or Membership system. Information may include your name, date of birth, postal address, email address, phone number, disability, ethnicity, your archery qualifications, award history or CRB / DBS / PVG checks that have been undertaken and a possibly a photograph.

### **Information we get from your use of our Website and services.**

Each time you visit our Website, we may automatically collect certain information. This information includes technical information, such as Internet Protocol (IP) addresses used to connect your computer to the internet, your login information, browser type and version, browser plug-in types and versions, operating system and platform and information relating to what pages you have viewed (e.g. using cookies as described further below);

When you enter competitions the following information may be collected and shared with tournament organisers, scoring systems and results may be published: Membership Number, First Name, Surname, Gender, Bow style, Date of Birth / Age category, Email, Address, Phone number, Club (and ID), County (and ID), Region (and ID), Round (unless defined by age), Disabled (Y/N), Disability info.

In accordance with our competition entry documentation, photography and video may be taken at events, and these images may be used on our website, social media platforms and promotional / internal documents.

### **How we may use your information**

We rely on the legitimate interest basis to use your personal information in some circumstances. For example, when you apply to become a member of Pendle and Samlesbury, we have a legitimate organisational interest to use your information to respond to you and give you the benefits of being a member as explained on the Website regarding features of being a member.

We also rely on obtaining your consent to use your personal information. For example, we will seek your consent to receive marketing via email and post about Pendle and Samlesbury.

We may use your information for a number of purposes including the following:

1. Compliance with legal, regulatory and corporate governance obligations and good practice
2. To provide you with information about our work or our activities that you have agreed to receive;
3. Building profiles

We use profiling and screening techniques to ensure communications are relevant and timely, and to provide an improved experience for our members and individuals who we may have a formal relationship with such as Instructors. Profiling allows us to evaluate and therefore understand our members and individuals who we may have a formal relationship with such as Instructors using appropriate statistical analysis. We do this because it helps us to make appropriate communications to our members and those individuals who we have a formal relationship with.

When building a profile, we may analyse geographic, demographic and other information relating to you in order to better understand your interests and preferences in order to contact you with the most relevant communications. We may use additional information from third party sources when it is available. Such information is compiled using publicly available data about you, for example addresses, listed Directorships or typical earnings in a given area.

We do not carry out profiling in relation to children.

1. Ensure we know how you prefer to be contacted
2. Keep a record of your relationship with us.

We will use the information we get from your use of our Website and services to:

1. administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
2. improve our Website to ensure that content is presented in the most effective manner for you and for your computer;
3. allow you to participate in interactive features of our service, when you choose to do so;
4. as part of our efforts to keep our Website safe and secure;
5. measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
6. make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them; and
7. any other reasonable purposes of Pendle and Samlesbury, acting always in accordance with the data protection law (as amended from time to time).

We will use the information you give us to:

1. perform services you have requested (such as providing you with Membership Benefits or providing you with information you have asked for);
2. administer the sport of Archery, for instance by organising tournaments;
3. provide you with information about other goods and services that we offer that are similar to those that you have already purchased or enquired about;
4. notify you about changes to our service, including but not limited to any changes to any Member Benefits;
5. ensure that content from our Website is presented in the most effective manner for you and for your computer; and
6. any other reasonable purposes of Pendle and Samlesbury, acting always in accordance with the data protection law (as amended from time to time).

You can also change any of your contact preferences at any time including telling us that you don't want us to contact you for marketing purposes by telephone, or by post by using the online Members' system or contacting our membership services team on.

Should you have a query regarding this please contact our Data Protection Officer.

We will not use your information for marketing purposes if you have indicated that you do not wish to be contacted for such purposes. However, we will retain your details on a suppression list to help ensure that we do not continue to contact you.

### **Information Sharing and Disclosure**

We may share your information with the following selected third parties:

1. Associate bodies such as County, Region and Clubs in order that they may communicate with you regarding archery events only or to allow the associate bodies to manage the running of the sport in their areas.
2. In addition, we may provide membership information such as email address and membership number to our online retailer. We use email addresses and membership numbers to validate discounts.
3. Analytics and search engine providers that assist us in the improvement and optimisation of Our Site.

We may disclose your personal information to third parties:

1. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
2. If Pendle and Samlesbury or substantially all of its assets are acquired by a third party, in which case personal data held by it about individuals who have applied for Membership (whether successfully or unsuccessfully) will be one of the transferred assets;
3. 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 other agreements; or
4. to protect the rights, property, or safety of Pendle and Samlesbury, Our Members, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. No data outside of EEA.

We require these third parties to comply strictly with our instructions and data protection laws and we will make sure that appropriate controls are in place. We enter into contracts with all of our data processors and regularly monitor their activities to ensure they are complying with Pendle and Samlesbury's policies and procedures.

We may disclose your personal information to third parties if we are under a duty to disclose your personal data in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

### **Users under 18**

If you are under 18 and would like to get involved, please ensure that you have consent from a parent or guardian before giving us your personal information. When we collect data about a child or young person aged under 18 we will make it very clear as to the reasons for collecting this data and how it will be used.

### **Keeping your records**

We keep records only for as long as required to operate the service in accordance with legal requirements and tax and accounting rules.

We may retain non identifiable data for statistical purposes for longer than 6 years.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of Pendle and Samlesbury and for how long. We need to do this to comply with the Companies Act 2006, which requires us to keep a register of members or [in the event of a claim against Pendle and Samlesbury].

### **Where we may store your information**

The data that we collect from you will be transferred to, and stored at Pendle and Samlesbury's registered office and online systems.

By submitting your personal data, you agree to this transfer, storing or processing.

Pendle and Samlesbury will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

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.

### **Your rights**

You have the right to:

1. Have any inaccuracies in your data corrected. If you would like to update the details we hold about you other than online, please contact our Data Protection Officer via telephone, email or by letter.
2. Request that we delete your personal data.
3. Object to profiling. Profiling is any automated processing of personal data to evaluate any feature of your behaviour preference or location, including online tracking and behavioural advertising.
4. Request that we do not process your personal data for marketing purposes.
5. You have a right to request a copy of the personal information we hold about you. We require you to prove your identity with two pieces of approved identification. Please address requests to the Data Protection Officer and we will respond within one month, of receipt of your written request and confirmed ID. Please provide as much information as possible about the nature of your contact with us to help us locate your records. This request is free of charge unless the request is manifestly unfounded or excessive.

### **Changes to this notice and the way we treat personal information**

We may update the terms of this privacy notice at any time, so please do check it from time to time.

We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us or by placing a prominent notice on our Website. By continuing to use our Website you will be deemed to have accepted such changes.

### **Enquires and Complaints**

The Data Protection Officer is the first point of contact regarding any enquires arising from this Privacy Notice. Where possible, please raise all enquires in writing.

If you are unhappy with our work or something that we have done or failed to do, please inform us in writing. Pendle and Samlesbury will acknowledge receipt of all complaints and will endeavour to investigate the complaint ASAP subject to availability of our volunteer officers.