

Data Protection Policy

Organisation: Lincolnshire County Archery Society (LCAS)

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Review Date: 01/04/2028 (or when roles change)

Responsible Officer: Steven Eales - Chair

Contact: chair@lincsarchery.co.uk

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2. 1. Introduction & Scope

The Lincolnshire County Archery Society ("the Society" or "LCAS") is committed to protecting your privacy and being transparent about how we use your personal information.

This policy sets out how the Society processes and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy applies to:

All officers, committee members, volunteers, and competition organizers acting on behalf of the Society

All members affiliated to LCAS

Tournament entrants and participants in county activities

3. 2. Our Role & Contact Details

Under UK GDPR, the Society acts as a Data Controller for the personal information we process.

Data Controller: Lincolnshire County Archery Society

Responsible Officer: Steven Eales, Chair

Deputy Officers: Jo Gisby – Vice Chair & Lynn Fisher - Secretary

Contact Details:

Email: chair@lincsarchery.co.uk

Response Times: We aim to respond to all data protection queries within 30 days.

4. 3. What Data We Collect

We collect only the personal data necessary to govern archery in the county, organize championships, and manage county teams.

Personal Data Categories:

Identity Data:

Full name

Date of birth

Gender

Gender at birth (Sport:80 Ask This Question)

Archery GB membership number

Club affiliation

Contact Data:

Postal address

Email address

Telephone number(s)

Emergency contact information

Sporting Data:

Bow style(s)

Competition scores

Handicaps and classifications

Tournament entries

County records

Team selection history

Special Category Data (Sensitive Personal Data):

Health or disability information specifically relating to:

Physical disabilities requiring adjustments on the shooting line (e.g., wheelchair use, visual impairments)

Medical conditions affecting safe participation (e.g., epilepsy, heart conditions)

Requirements for assistance or reasonable adjustments

Eligibility for specific award categories (e.g., para-archery classifications)

For Juniors (under 18):

Parent/guardian name and contact details

Parental consent records (for membership, photography, data processing)

Date of birth (to verify age category)

Financial Data (where applicable):

Bank details for refunds only (processed and deleted immediately after transaction)

Photography/Video Data:

Images or video footage taken at LCAS events (with consent)

Website Data:

Basic website analytics (IP addresses, browser type, pages visited) if using cookies - see our separate Cookie Policy www.lincsarchery.co.uk/cookies

5. 4. Lawful Basis for Processing

We only process your data when we have a lawful basis to do so:

Standard Personal Data:

Legitimate Interests (Article 6(1)(f) UK GDPR)

To administer the sport of archery within Lincolnshire

To verify club and Archery GB affiliations

To manage county records, rankings, and classifications

To select and manage county teams

To publish competition results

Legitimate Interests Assessment: We have assessed that our legitimate interest in administering county archery does not override your rights and freedoms. The data we process is minimal, expected in a sporting context, necessary for the functioning of organized archery, and you can reasonably expect us to use your data for these purposes when you join or compete.

Contractual Necessity (Article 6(1)(b) UK GDPR)

When you enter a County Championship or tournament, we need your data to process your entry, create target lists, and publish results

Consent (Article 6(1)(a) UK GDPR)

For marketing communications (newsletters, non-essential updates)

For photography and video for promotional purposes

Legal Obligation (Article 6(1)(c) UK GDPR)

Compliance with insurance requirements

Responding to legitimate requests from law enforcement or regulatory bodies

Special Category Data (Health Information):

Processing health information requires both a lawful basis (above) and a separate condition under Article 9 UK GDPR:

Article 9(2)(f) - Legal Claims

Processing necessary for the establishment, exercise, or defense of legal claims (insurance/liability purposes)

Article 9(2)(h) - Health or Social Care

Processing necessary to ensure health and safety on the shooting line

To make reasonable adjustments for disabled participants

Explicit Consent (Article 9(2)(a))

Where the above conditions do not apply, we will ask for your explicit consent to process health data

6. 5. How We Use Your Data

We use your personal data to:

Verify membership: Check valid membership with Archery GB and affiliated clubs

Tournament administration: Manage entries, create target lists, process results for County Championships and leagues

Results publication: Publish scores and rankings on our website and share with archery results databases

County team selection: Identify eligible archers and invite them to county squads

County records: Verify, claim, and maintain county record claims

Communication: Send notices of AGMs, tournaments, and official Society business

Insurance verification: Confirm valid insurance coverage for participants

Safety management: Ensure appropriate arrangements for archers with disabilities or health conditions

Child protection: Maintain safeguarding standards for junior members (where applicable)

Compliance: Meet requirements set by Archery GB and affiliated organizations

Dispute resolution: Handle complaints, appeals, or queries about eligibility, scores, or conduct

Historical archive: Preserve the sporting heritage of archery in Lincolnshire

7. 6. Data Sharing

We do not sell personal data to third parties. However, we may share your data with the following parties for legitimate purposes:

Archery GB

As the national governing body, we share data with Archery GB via the Sport80 platform for:

Membership validation

Insurance verification

National records and rankings

Compliance with governing body requirements

East Midlands Archery Society (EMAS)

For regional affiliation and inter-county competitions.

Tournament Organizers

When the County delegates a championship to a host club, we share necessary participant details (name, club, bow style, contact details, entry fees) to enable them to run the event.

Public Domain

Limited data (Name, Club, Bow Style, Score, Age Category) will be published in:

Tournament results on our website

County rankings and records pages

Third-party archery results websites (e.g., lanseo, Archery Records UK)

This is standard practice in competitive sport and necessary for the integrity and transparency of competition.

Insurance Providers

In the event of an incident or claim, relevant data may be shared with our insurers.

Legal Authorities

We may share data with law enforcement, regulatory bodies, or courts if legally required to do so.

Service Providers

We use trusted third-party services to help us operate (e.g., email platforms, website hosting, cloud storage). These providers process data on our behalf under strict confidentiality agreements.

Media Outlets

With consent, photographs may be shared with local newspapers or archery publications for publicity purposes.

8. 7. Access to Archery GB Portal (Sport80)

To verify membership, insurance status, and manage county affiliations effectively, designated officers have administrative access to member data within the Archery GB Sport80 platform.

Access is strictly limited to:

Chair: Oversight, affiliation management, and dispute resolution

Secretary: General administration and communication

Membership Secretary: Processing affiliations and verifying member status

County Coaching Organiser (CCO): Verifying coach credentials and organizing coaching activities

Access Conditions:

These officers must:

Access only data necessary for their specific role

Keep login credentials strictly confidential

Log out of the Sport80 portal when not in use

Not share their access with other committee members or third parties

Report any suspected unauthorized access immediately

Comply with confidentiality obligations under LCAS governance rules

Security Measures:

All access is logged by the Sport80 system

Officers receive data protection training upon appointment

Access is reviewed annually and revoked when officers leave their roles

9. 8. Data Retention

We will not keep your data longer than necessary for the purposes for which it was collected.

Retention Schedules:

Data Type	Retention Period	Reason
Membership records	Duration of membership + 3 years	Insurance queries, historical records
Tournament entry forms	1 year after event	Query resolution, refund processing
Tournament scores & results	Indefinitely	County records, historical sporting archive (public interest)
Tournament Score Sheets	60 Days	For record claims or disputes
Committee minutes	Permanently	Historical record of the Society (public interest)
Email correspondence	1 years – unless needed for legal or historical purposes	Administrative purposes
Financial records	6 years	Legal/tax obligations
Photography consent records	Duration of use + 1 year	Evidence of consent
Health/disability information	Duration of membership + 1 year	Safety management; deleted when no longer needed
Safeguarding records	As per Archery GB policy	Child protection requirements

Archiving Justification:

Historical competition results (names, scores, clubs) are retained indefinitely in line with the public interest in preserving sporting heritage. This allows future generations to research county archery history and maintains the integrity of record claims.

Deletion Process:

When retention periods expire:

Digital records are permanently deleted from all systems and backups

Paper records will be shredded or burnt

10. 9. Your Rights

Under UK GDPR, you have the following rights regarding your personal data:

Right of Access

Request a copy of the personal data we hold about you (Subject Access Request). We will provide this free of charge within 30 days.

Right to Rectification

Correct any inaccurate or incomplete data (e.g., change of address, bow style, emergency contact).

Right to Erasure ("Right to be Forgotten")

Request deletion of your data where:

- It is no longer necessary for the purpose collected
- You withdraw consent (where consent was the lawful basis)
- You object to processing and there are no overriding legitimate grounds
- The data was unlawfully processed

Important Limitations: We cannot delete data where:

We have a legal obligation to retain it (e.g., financial records)

It forms part of the historical sporting record (published results, county records)

It is necessary for the establishment, exercise, or defense of legal claims

Right to Restriction

Request we restrict processing of your data in certain circumstances (e.g., while we verify accuracy following a correction request).

Right to Object

Object to processing based on legitimate interests. We will stop processing unless we can demonstrate compelling legitimate grounds that override your rights.

Right to Data Portability

Receive your data in a structured, commonly used format (e.g., CSV file) to transfer to another organization (limited applicability for sporting data).

Right to Withdraw Consent

Where we rely on consent (e.g., photography, marketing), you may withdraw it at any time. This does not affect the lawfulness of processing before withdrawal.

Rights Related to Automated Decision-Making

You have the right not to be subject to decisions based solely on automated processing. (We do not use automated decision-making - see Section 12.)

How to Exercise Your Rights:

Contact our Responsible Officer:

Email: chair@lincsarchery.co.uk

We will respond within 30 days (or 60 days for complex requests, with explanation).

Right to Complain:

If you are unhappy with how we handle your data or our response to your request, you have the right to complain to the Information Commissioner's Office (ICO):

Website: www.ico.org.uk

Telephone: 0303 123 1113

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

11. 10. Data Security

We take the security of your personal data seriously and have implemented appropriate technical and organizational measures:

Digital Security:

Password-protected devices with strong password requirements

Regular password changes (every 90 days for officers)

Two-factor authentication where available (e.g., Sport80 access)

Secure cloud storage with encryption (Zoho) with access restricted to relevant officers only

Regular software updates and security patches

Regular data backups stored securely

Access logging for Sport80 and other administrative systems

Physical Security:

Shredding / Burning of paper records when no longer needed

Organizational Security:

Access controls - officers only access data necessary for their role

Data protection training for all committee members

Confidentiality obligations in officer role descriptions

Review of who has access to what data every 6 months or when roles change

Access revoked immediately when officers leave their roles

"Need to know" principle applied to all data sharing

Third-Party Security:

All service providers we use (email platforms, cloud storage, website hosting) are assessed for appropriate security measures and GDPR compliance.

12. 11. Data Breaches

A data breach occurs when personal data is accidentally or unlawfully lost, altered, disclosed, or accessed without authorization.

Examples include:

Sending an email with member details to the wrong recipient

Loss or theft of a device containing personal data

Unauthorized access to our systems

Accidental publication of sensitive data on the website

Our Response Process:

- Immediate containment: Stop the breach and secure systems
- Assessment: Evaluate the risk to individuals' rights and freedoms
- Notification to ICO: If the breach poses a high risk, we will notify the ICO within 72 hours
- Notification to affected individuals: If the breach poses a high risk to their rights, we will inform them without undue delay
- Investigation: Determine the cause and how to prevent recurrence
- Documentation: Record all breaches in our breach register
- Learning: Implement improvements to prevent similar incidents

Reporting Suspected Breaches:

If you become aware of a suspected data breach (as a member, officer, or third party), please report it immediately to:

Responsible Officer: Steven Eales

Email: chair@lincsarchery.co.uk

All officers and volunteers must report suspected breaches within 24 hours of becoming aware.

13. 12. Children's Data

We recognize that children's data requires additional protection. A child is any person under the age of 16 for data protection purposes (or under 18 for safeguarding purposes).

Additional Safeguards for Children:

Parental Consent:

We obtain verifiable parental/guardian consent before processing a child's data for membership, photography, or marketing

Parents can withdraw consent at any time

Limited Data Collection:

We collect only essential data for junior members

Health information is only collected where necessary for safety

Publishing Restrictions:

We never publish contact details or other sensitive information about children

Photography & Social Media:

Explicit parental consent required before publishing photos of children

We follow Archery GB safeguarding photography guidelines

Data Sharing:

Children's data is only shared where necessary and with appropriate safeguards

We do not share children's data for marketing purposes

Safeguarding:

Safeguarding records are maintained in accordance with Archery GB Safeguarding Policy

These records are kept confidential and retained as per statutory requirements

Rights of Children:

Parents/guardians can exercise data rights on behalf of their child

From age 13, children may exercise certain rights themselves if they have sufficient understanding

14. 13. Automated Decision-Making

We do not use automated decision-making or profiling that produces legal or similarly significant effects.

All decisions regarding:

County team selection

Tournament entry approval

Record claims

Membership applications

are made by human officers with appropriate expertise, and you have the right to contest decisions and request human review.

15. 14. International Transfers

Some of our IT service providers (e.g., cloud storage, email platforms) may process data outside the UK, including in countries that do not have equivalent data protection laws.

Where we use such providers:

We ensure they are located in countries with an adequacy decision from the UK Government, OR

We use Standard Contractual Clauses or other appropriate safeguards approved under UK GDPR, OR

The provider is certified under an approved framework (e.g., EU-US Data Privacy Framework where applicable)

Current international transfers:

Details of current international transfers available on request

16. 15. Changes to This Policy

We review this policy every 2 years or when there are significant changes to:

How we process data

The legal or regulatory environment

Our operations or services

When we update this policy:

We will publish the new version on our website with the revision date

We will notify members of significant changes via email or at the AGM

Previous versions will be archived and available on request

Latest version is always available at: www.lincsarchery.co.uk/county-documents

17. 16. How to Contact Us

Data Protection Queries:

Responsible Officer: Steven Eales - Chair

Email: chair@lincsarchery.co.uk

General Society Queries:

Secretary: Lynn Fisher - Secretary

Email: secretary@lincsarchery.co.uk

Website: www.lincsarchery.co.uk

Complaints to the Regulator:

Information Commissioner's Office (ICO)

Website: www.ico.org.uk

Helpline: 0303 123 1113

Post: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

18. Member-Friendly Summary (One-Page FAQ)

Your Privacy - Quick Guide

What data do you collect about me?

Your name, contact details, date of birth, Archery GB number, club, bow styles, and competition scores. If needed for safety, we may collect health information (e.g., wheelchair use).

Why do you need my data?

To run tournaments, verify you're insured, publish results, select county teams, and manage county records.

Who sees my data?

Only LCAS officers who need it, Archery GB (for membership checks), and the public (for published results). We don't sell your data.

How long do you keep it?

Membership details for 3 years after you leave. Competition results indefinitely (for historical records). Health information is only needed.

What are my rights?

See what data we hold (free)

- Correct mistakes
- Ask us to delete it (unless we need it for records/legal reasons)
- Object to how we use it
- Complain to the ICO

Is my data secure?

Yes - password-protected systems, trained officers, and strict access controls.

What about children?

We get parental consent and take extra care with junior members' data.