



GUILDFORD WORKING GUNDOG CLUB

PRIVACY NOTICE

May 2018

1. Introduction

- 1.1. Guildford Working Gundog Club (“**GWGC**” or “**we**”) is committed to protecting your personal information and respecting your privacy. This Privacy Notice sets out the basis on which any personal data that we collect from or about you, or that you provide to us, will be processed by us. We may update this Privacy Notice from time to time. Please check back regularly to see any updates or changes to this Notice. For the purpose of the General Data Protection Regulation (“**GDPR**”), GWGC is a data controller.

2. Data Protection Contact

- 2.1. The contact details of our Treasurer, who is our Data Protection Lead, for any data protection queries are julia.gwgc@gmail.com or 01483 281264.

3. Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

4. Particulars of processing

- 4.1. We process personal data about members, judges, stewards, other helpers, guns and competitors who may attend our Gundog Working Tests, Field Trials, training events, meetings and any other activities. The categories of person about whom we process personal data are described in more detail in the Annex to this Privacy Notice.

5. Your rights as a data subject

- 5.1. GDPR provides the following rights (subject to some exemptions):

- 5.1.1. The right to request access to the personal data that we hold about you;
- 5.1.2. The right to request rectification of the personal data that we hold about you;
- 5.1.3. The right to request erasure of the personal data that we hold about you;
- 5.1.4. The right to request restriction of processing about you;
- 5.1.5. The right to object to processing; and
- 5.1.6. The right to data portability.

If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Lead using the details above.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner’s Office (ICO) full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

6. How we will use information about you

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

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

4. Where we need to protect your interests (or someone else's interests).
5. Where it is needed in the public interest.

6.1 We will generally process your personal data for contractual necessity in providing membership services and events. We may also use personal information for additional relevant and related purposes where you might reasonably expect us to do so, where the benefits of doing so are not outweighed by your own interests or fundamental rights or freedoms. This may include:

- 6.1.1. To maintain our records and other administrative purposes, including updating your details and preferences;
- 6.1.2. To assist with queries, complaints and dispute resolution;
- 6.1.3. For communications related to membership and invitations to participate in canine market research or canine health studies;
- 6.1.4. To assist with upholding GWGC's constitution or rules and taking action in cases where there may be a breach of GWGC's constitution or rules.

6.2 We will ask for your direct consent IF we intend to use your personal data for marketing purposes.

6.3 Where our processing of personal data is based on your having given consent, you have the right as a data subject to withdraw that consent at any time. If you wish to invoke this right, please notify the Data Protection Lead using the contact details set out in Section 2. above.

6.4 You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

7. Recipients of Data

7.1. From time to time we may use service providers to help us provide you with our Gundog Working Tests, Field Trials, training classes and any other events. Personal data may be transferred to such service provider, who may act for or on our behalf as a data processor, for further processing in accordance with the purpose(s) for which the data was originally collected or may otherwise be lawfully processed. Alternatively, such service providers may be data controllers in their own right and contract with you directly.

7.2. Where such third parties act as our data processor, they have contracted with us as data processors under GDPR requirements. They are contractually bound to only use personal data for the agreed purpose(s). Relevant persons working for these third parties will have access to your personal data under the terms of the data processor contract, but only to the extent necessary to perform their services for us.

7.3. These data processors agree to implement reasonable contractual and technical protections, to keep your data confidential, not sell your personal data to third parties and to not disclose your personal data to third parties except as may be required by law, as permitted by us or as stated in this Privacy Notice.

7.4. In appropriate circumstances we may disclose data to authorised bodies as required by law or regulation.

8. Visitors to the GWGC website and Cookies

8.1. We do not use cookies to monitor how people use our website.

ANNEX

This Annex sets out GWGC's processing activities in relation to the personal data of members, judges, hosts and landowners, game keepers, stewards, other helpers, guns and competitors who may attend our various events.

What personal data do we process, why do we process it and what is the lawful basis?

Members											
Personal data processed:											
<ul style="list-style-type: none"> • Name • Address • Email address • Telephone number(s) 											
We process your personal data for the following purposes:											
<table border="0"> <thead> <tr> <th style="text-align: left;">Purpose</th> <th style="text-align: left;">Lawful basis</th> </tr> </thead> <tbody> <tr> <td>• Provision of membership services including administration and transactional communications relating to membership matters</td> <td>Contractual Necessity</td> </tr> <tr> <td>• Upholding the Club/Society Rules</td> <td>Contractual Necessity</td> </tr> <tr> <td>• Compliance with Kennel Club Rules and Regulations</td> <td>Contractual Necessity</td> </tr> <tr> <td>• Contacting you regarding newsletters, year books, invitations and information about GWGC's Gundog Working Tests, Field Trials, training events, meetings and any other activities.</td> <td>Legitimate Interests</td> </tr> </tbody> </table>	Purpose	Lawful basis	• Provision of membership services including administration and transactional communications relating to membership matters	Contractual Necessity	• Upholding the Club/Society Rules	Contractual Necessity	• Compliance with Kennel Club Rules and Regulations	Contractual Necessity	• Contacting you regarding newsletters, year books, invitations and information about GWGC's Gundog Working Tests, Field Trials, training events, meetings and any other activities.	Legitimate Interests	
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• Contacting you regarding newsletters, year books, invitations and information about GWGC's Gundog Working Tests, Field Trials, training events, meetings and any other activities.	Legitimate Interests										
Judges											
Personal Data Processed:											
<ul style="list-style-type: none"> • Name • Address • Email address • Telephone number(s) • KC judges' ID number 											
We process your personal data for the following purposes:											
<table border="0"> <thead> <tr> <th style="text-align: left;">Purpose</th> <th style="text-align: left;">Lawful basis</th> </tr> </thead> <tbody> <tr> <td>• Administration and communications relating to judging appointments at our Gundog Working Tests and Field Trials</td> <td>Contractual Necessity</td> </tr> <tr> <td>• Upholding the Club/Society Rules.</td> <td>Contractual Necessity</td> </tr> <tr> <td>• Compliance with Kennel Club Rules and Regulations (including sharing relevant required information)</td> <td>Contractual Necessity</td> </tr> <tr> <td>• Publication in the Club/Society Gundog Working Tests and Field Trials schedules</td> <td>Legitimate Interests</td> </tr> </tbody> </table>	Purpose	Lawful basis	• Administration and communications relating to judging appointments at our Gundog Working Tests and Field Trials	Contractual Necessity	• Upholding the Club/Society Rules.	Contractual Necessity	• Compliance with Kennel Club Rules and Regulations (including sharing relevant required information)	Contractual Necessity	• Publication in the Club/Society Gundog Working Tests and Field Trials schedules	Legitimate Interests	
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• Publication in the Club/Society Gundog Working Tests and Field Trials schedules	Legitimate Interests										
Competitors											
Personal data processed:											
<ul style="list-style-type: none"> • Name • Address • Email address • Telephone number(s) • Dog information 											
We process your personal data for the following purposes:											
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• Provision of services relating to our Gundog Working Tests and Field Trials	Contractual Necessity
• Upholding the Club/Society Rules	Contractual Necessity
• Compliance with Kennel Club Rules and Regulations	Contractual Necessity
• Contacting you regarding future Gundog Working Tests and Field Trials	Legitimate Interests
• Publication of the results of our Gundog Working Tests and Field Trials on our websites or social media and/or in the shooting press	Legitimate Interests
Hosts and Landowners, Game Keepers, Stewards, other Helpers and Guns	
Personal data processed:	
<ul style="list-style-type: none"> • Name • Address • Email address • Telephone number(s) 	
We process your personal data for the following purposes:	
Purpose	Lawful basis
• Administration and transactional communications relating to our Gundog Working Tests, Field Trials, training events and any other activities	Legitimate Interests
• Upholding the Club/Society Rules	Legitimate Interests
• Compliance with Kennel Club Rules and Regulations (including sharing relevant required information)	Legitimate Interests

We also process personal data for the Club/Society's legitimate interests as we have outlined in the main Privacy Notice (paragraph 6.1). Please be assured that we will always take account of your personal data rights in doing so.

Where do we obtain your personal data from?

Most of the above personal data is received direct from you (as the data subject). However, information may be received from third parties (e.g. Field Trial Management System).

How long do we hold your personal data for?

Personal data will be retained in accordance with statutory requirements and Kennel Club. GWGC's data retention policy is available on request.

Are you obliged to provide us with your personal data?

You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we will be unable to perform any contract we have with you for the provision of membership services, judging appointments or event services.

Recipients of your personal data

The Kennel Club will hold the personal data of GWGC Officers as a part of the implementation of Kennel Club Rules and Regulations. We provide the Kennel Club with details of GWGC officers, members and Field Trial results in order to meet requirements in the Kennel Club Rules and Regulations.

We disclose personal data to the following outsourced data processor, in line with sections 6 and 7 of our main Privacy Notice and only for the purposes stated below:

The Rocket Science Group LLC t/a MailChimp, a State of Georgia limited liability company for the purpose of bulk emailing of information about Gundog Working Tests, Field Trials, training events, any other activities and administrative matters to members. Details of MailChimp's Privacy Policy can be found at <https://mailchimp.com/legal/>

Do we use your data for any automated decision-making?

No personal data is processed for automated decision-making.

Any financial data arising from a transactional process will be held securely by GWGC in accordance and compliance with all statutory and HMRC requirements.