

PRIVACY POLICY of The Berwyn Rod and Gun Club, Inc

Purpose

The Officers and Executive Committee of the Berwyn Rod and Gun Club, Inc., hereafter referred to as the BRGC, place a high value on the privacy of our membership. To that end, the Executive Committee has adopted the following policy regarding the protections of members personal information maintained by the BRGC. This policy describes what types of information is gathered, how it is protected, how it may be used, under what circumstances it may be disclosed to third parties, and individual rights to update or correct it. This policy also contains the steps the Executive Committee will take in the event of a security breach where personnel information is compromised, in order to comply with the Maryland Personal Information Protection Act.

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Information Collection

Third Party Services

The BRGC utilizes many third-party services, such as SignEasy, Google, Wild Apricot and others as required to conduct normal and routine business. Each third-party service maintains their own individual privacy policy.

The BRGC Website

Website Activity

The BRGC may gather certain broad information about website use including the number of unique visitors. This data is looked at in summary form, and on an individual basis. The club will only gather this information to learn how many people visit the BRGC site. This data will help us determine the extent to which our members and the public use certain parts of our website. Thus, BRGC uses this information to help in restructuring the site to better meet the needs of the members and the public.

The BRGC Website and services are intended for the members of the BRGC and members of the general public who may wish to join, learn more about, or participate in the activities sponsored by the club. BRGC does not knowingly collect any personal information from children under 18 years of age on the BRGC Website. Online information on our juniors' program is intended for the parents or legal guardians of the participants or potential participants of our juniors' program. BRGC is committed to complying fully with the Children's Online Privacy Protection Rule ("COPPA") of 1998. Of course, the BRGC encourages all parents and legal guardians to talk with their children about communicating and disclosing personal information online, as well as the safe handling of any firearm, bow, sharp object, power tool, or any other device that may cause injury.

The BRGC does not compile lists for communications with outside parties or for marketing purposes. This includes telemarketers, mailing list brokers, or other companies or organizations even if they may provide firearm related services or benefits. If outside entities wish to communicate with the membership of the BRGC, that entity will have to request the President of the BRGC to authorize that communication. If the President concurs with the request, the message will be sent to the membership by the President or a member of the Executive Committee at the direction of the President via the club's secure Wild Apricot membership management system.

Cookies

The BRGC does utilize a standard technology called a "cookie" to collect information about how the site is used. Cookies are small strings of text stored on the local computer's hard drive by a Web server. BRGC uses session cookies to identify individual computers during a particular session, i.e., when placing an online order or signing into a site. Such cookies enable users to store passwords and other personal information for faster logon and/or quicker account access. BRGC does not store personal or sensitive information in cookies within the server or website. Cookies cannot retrieve any other data from the local hard drive, pass on computer viruses or capture email addresses. Most Web browsers provide the ability to accept or decline cookies, as well as to be warned each time a cookie is being sent.

IP Addresses

The BRGC may collect and analyze traffic on our website by keeping track of the IP address of our visitors. IP addresses are unique numeric identifiers that are assigned to each computer

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browser accessing the Internet. An IP address, by itself, cannot identify a single individual personally. However, when combined with other information provided by the Internet Service Provider, the IP address can be used to identify the individual computer originating a message.

Personal Information Collected from Members and Applicants

Each applicant and member of BRGC is asked to provide personal information, including name, email address, home address, work address, home and work telephone numbers, occupation, membership in related organizations, proof of firearms training, and other personal information. Should any member wish to pay various online invoices or membership dues by credit card, that information, along with additional information such as billing address, credit card number and expiration date. Depending upon legal requirements or restrictions placed upon the BRGC by its insurance carrier, may ask for additional information in order to process membership applications or enable a member to perform restricted voluntary services or financially compensated services for the club. For example, individuals who wish to provide firearms training on BRGC property for compensation must provide evidence of firearms training certificate(s) and their liability insurance as directed by the Executive Committee. Executive Committee members who participate in financial transactions may be required to provide the BRGC bank or online financial institute with additional information. There may also be opportunities for members to provide additional information regarding preferences and interests. This information, however, is not required and is completely optional. This information will not be shared outside of the BRGC. The BRGC may provide an option for members to supply an emergency contact name and telephone number in the future.

Audio and Video Monitoring/Recording of Activities

Audio and Video monitoring/recording is conducted around the exterior of the club house, and other locations accessible to BRGC members on the club's property. By entering the club property, members and guests are consenting to this monitoring.

The BRGC currently uses the Ring.com system of cameras with the following features:

- Motion-activated notifications
- Real-time video with Live View
- Two-Way talk
- Security Siren
- Video history for up to 180 days
- Snapshot capture "image" for up to 7 days

Access to the Ring system is limited to the President, who is the owner of the Ring.com account, Vice President, Secretary, Treasurer and Range Safety Chairperson. The deputy of an Officer may be granted access if all four (four) officers agree. An Officer may opt out and not receive access.

1. Audio and Video recordings may be used to research Internal BRGC Range violations, accidents, or other emergent events.
2. Audio and Video recordings are not shared with any outside organizations, including Law Enforcement and neighborhood applications.
 - a. The exception to this is if the BRGC Officers are served with an official court order, and only after consultation with the BRGC legal representative.

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Video Teleconferencing Sessions

The BRGC has the ability to establish and use video teleconferencing services to conduct meetings. The security and privacy of these commercial teleconferencing services are not completely under the control of the club. The BRGC, its officers, or the Executive Committee who may initiate these sessions, will make every attempt to ensure these sessions are as secure as possible. BRGC currently utilizes the ZOOM video teleconferencing software suite for online collaboration and meetings. Conference sessions are restricted to the invited audience via private meeting invitations, access codes, and host acceptance. However, given the managed configuration limitations of the selected video conferencing systems, the state of technology, and the ongoing cybersecurity threats, complete privacy cannot be assured. BRGC members who participate in these teleconferencing sessions must be aware of the software limitations and should be cautious of sharing during these sessions.

The Newsletter

The BRGC publishes a newsletter that contains club information and articles of interest to the membership. This newsletter contains contact information for event organizers, providers of sanctioned services, and contact information for the Officers and the Executive Committee members. The newsletter may also publish photographs of the participants at club events with each participant's individual consent. Any image of a minor child will require the written authorization of the parent or guardian prior to use. Last names of minors will not be used in any publication or online posting.

Photography or Video Recordings Made at BRGC Sanctioned Events

BRGC members are expressly forbidden to take photographs or video recordings of club members or their guests unless expressly sanctioned by the Officers or the Executive committee and approved by those being photographed. Allowed under this policy are:

1. Photograph taken to record or document the condition of the club property for repairs, maintenance, or range safety.
2. Photography taken during BRGC sanctioned events under the supervision of an event coordinator or the Executive Committee chair running the event. BRGC members and their guests may opt-out of these recordings by notifying the event coordinator or the Executive Committee chair running the event.
3. Video or still photography recorded by the club's security cameras.
4. Production of range badges or other credentials.

BRGC members and guests, as well as the public attending open events, are prohibited from creating any multimedia or media content of activities occurring on BRGC properties, for public distribution, without the express written permission of the Club President in accordance with current BRGC Range Rules and Bylaws.

Electronic Databases

The BRGC maintains an electronic record of membership data. Some of this information is collected from applicants when they apply for membership in the BRGC. This information includes the following information:

- a. Name
- b. Electronic mail address
- c. Home Phone
- d. Address
- e. Mobile Phone
- f. Work Phone

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- g. NRA Membership Information
- h. Occupation
- i. Other Gun Clubs the member may belong to
- j. Date Joined BRGC
- k. BRGC Range Badge Number
- l. BRGC Certifications Held
- m. Date Attended Range Check
- n. NRA Certifications Data
- o. Birth Date
- p. Firearm Instructor Certifications Held
- q. Class III Certification
- r. Holster Draw Certification
- s. RSO Certification
- t. Firearms Instructor/DNR Instructor Qualification
- u. Membership level and status
- v. Events you may have participated in
- w. Donations you have made to the BRGC
- x. A Photo of the member.

Not all of this information is maintained on all members as much of this information is optional or may not apply to the individual member.

Unless required to comply with or provide information for club financial management or for any taxing authorities, BRGC does not maintain on file:

- a. Social Security Account Numbers
- b. Driver license numbers
- c. Individual taxpayer identification numbers
- d. Financial account numbers on individuals
- e. Credit Card numbers

Paper Records

The BRGC maintains a paper record of present and past members in a secured, file storage facility. This record contains the initial application to join the BRGC, and any recently signed document such as the Liability Waivers, membership renewal forms, certifications, and a copy of selected club correspondence that the Secretary deems necessary to maintain club historical records. If a member renews using a credit card, that information is either removed from the renewal documents and shredded or redacted so it is illegible.

The BRGC requires that adult parents or guardians sign a waiver of liability for the participants in various programs, classes, or events, such as the Juniors' program which includes the name of the junior participant and the contact of the adult parent or guardian accompanying the junior participant. No other information is collected from a participant in the BRGC Juniors' program. These records are maintained by the Juniors' chair and destroyed after one-year.

Use of Your Electronic Mailing Address

BRGC conducts much of its club business via electronic mailing, or e-mail, to send such things as the BRGC newsletter; membership renewal notices, notices of scheduled or unscheduled events on the ranges; notices of temporary range closures due to construction, repairs, or other activities conducted on the property; notices of BRGC social events; notices of proposed changes to the governing documents of the BRGC; notices of proposed expenditures requiring

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membership approval; updates to the Range Rules; and other notices from time to time that the Officers of the BRGC wish to convey to the membership. BRGC will not provide membership electronic mailing address to solicitors, corporations, private citizens (other than authorized club members for official club business), firearm related companies or Second Amendment organizations, nor any political organization or cause.

Opting Out

If a member does not wish to receive these electronic mailings, they can opt out of the BRGC electronic mail distribution list by using the "Opt Out" option contained in each email, or by contacting the Secretary of the BRGC at any business meeting; by sending an electronic mail to: secretary@berwyn.org; or by writing to us at Secretary, Berwyn Rod & Gun Club, 8311 Laurel Bowie Road , Bowie, MD 20715. Any member who chooses to no longer receive messages via electronic mail, may not receive timely notices of shooting events, membership renewal notices, the newsletter, or maintenance activities that may affect their ability to fully access the range facilities or events. Any group email created by any Officer or Executive shall be delivered via BLIND CARBON COPY (BCC) only and email addresses shall not be shared within the context of the email information.

Editing Personal Information

Currently, each member may update their personal information (i.e. change name and address information, electronic mail address, etc.) or certain club related information (firearms certifications held, etc.) by logging into the Website or by downloading the Wild Apricot Membership App from either the Google PlayStore or the Apple Store and logging in with their BRGC credentials.

Data Security

The BRGC protects members personal information by using technologies and processes such as TLS encryption, access control procedures, network firewalls, physical security and other measures. Whenever personal data is collected by a BRGC website, the data is secured in transit by encryption. Only authorized BRGC members, employees or contractors of the BRGC with a legitimate business purpose are allowed access to any personal information. BRGC maintains policies and procedures to deal with club members who violate any privacy and confidentiality policies. Credit card data provided by members is not electronically recorded in any database. Credit card numbers recorded on paper are either redacted or the paper copy is shredded once the funds have been transferred and verified.

The BRGC Website requires members to establish and use a password to protect personal information from unauthorized access by others. It is the member's individual responsibility to secure their personal password used on the BRGC Website. Member personal passwords are not maintained by or known to any BRGC administrative member who has access to the Website. The BRGC is not responsible for the privacy practices of websites linked within the BRGC website or for the privacy practices of other third parties. When leaving the BRGC site using such a link or by clicking on an advertisement, members should therefore check the applicable privacy policy of the third party or advertiser to determine its individual practices and ensure they are logging out of the BRGC website completely and properly.

Data Retention.

The primary information storage and retention process for the BRGC Membership Application data shall be in digital format. The BRGC will maintain a digital database of current members. The BRGC currently houses membership paper records from previous years which are being transferred to digital format and will be destroyed as they are scanned. New paper copies will be

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destroyed within one year or once the membership badge is issued and the membership data has been transferred to the Wild Apricot membership system.

Retention of paper or digital sign-in logs, waivers, and or any event related documents will be maintained for three years.

Release of Personal Information

Except for the circumstances listed in this section, BRGC does not release any personal information to any non-BRGC person, organization, private or public company, or government agency. The BRGC does not release any personal information to unauthorized BRGC members. BRGC does not provide any mailing list or telephone contact information to private companies. The exceptions to this policy are:

- a. If the BRGC Officers are served with an official court order, and only after consultation with the BRGC legal representative.
- b. The Secretary may allow selected BRGC members to view or update personal information on members or applicants in the course of conducting legitimate BRGC business.
- c. The Secretary will provide membership information to select companies having business with that BRGC when mandated to obtain services. Any membership information provided will be the minimum required. For example:
 - i. The BRGC's financial accounting firm may request a membership list during their annual financial audit.
 - ii. The BRGC's insurance company may require an annual membership list to compute the insurance premium.
 - iii. Complying with federal or state authorities when statute authorities compel that such information be provided.

Policy Violations and Data Security Breach Provisions

Policy Violations

BRGC members who violate the provisions of this policy are subject to disciplinary actions within the authority of the Executive Committee. These actions may include: a verbal or written reprimand; temporary suspension for any or all BRGC activities for a specified period of time; and expulsion from the BRGC.

Data Security Breach Provisions

The BRGC will comply with the provisions of the Maryland Personal Information Protection Act ("MPIPA"). This act defines a security breach as the "unauthorized acquisition of computerized data that compromises the security, confidentiality or integrity of personal information". This act defines personal information as an individual's first and last name in combination with a: Social Security Number, Driver's License Number, Financial Account Number or Individual Taxpayer Identification Number unless the information is encrypted, redacted, or otherwise rendered unusable.

In the event of a data breach, the BRGC will notify its members via the most expeditious means possible, preferably by electronic mail or written letter when required by law.

Changes to This Policy

The BRGC may occasionally update this Privacy Policy. When changes to this policy are made, the membership will be notified of these changes in the BRGC newsletter. The BRGC encourages each member to periodically review this Policy.

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Contacting the BRGC

Questions concerning this Policy or any practice related to this policy should be addressed in writing by contacting the Secretary in person at either the general business meeting; by electronic mail at secretary@berwyn.org; or by postal mail at the address shown below:

Secretary
The Berwyn Rod & Gun Club
8311 Laurel Bowie Road
Bowie, MD 20715

We, the undersigned Officers of the BRGC do hereby approve the adoption of this Privacy Policy for the BRGC on this the 12th Day of October 2023.

Thomas Hanyok

Thomas Hanyok (Oct 12, 2023 11:06 EDT)

Thomas Hanyok, President

Steve Gunyon

Steve Gunyon (Oct 12, 2023 17:29 EDT)

Steve Gunyon, Secretary

Dwight Barnthouse

Dwight Barnthouse (Oct 12, 2023 11:08 EDT)

Dwight Barnthouse, Vice President

Jeffrey A. Brown

Jeffrey A. Brown (Oct 12, 2023 18:07 EDT)

Jeffrey Brown, Treasurer