



Saffron Walden Swimming Club DATA PRIVACY NOTICE

Saffron Walden Swimming Club (SWSC) is a Swim England affiliated club and complies with the Data Protection policy of Swim England/British Swimming.

We are committed to respecting the privacy of members. This notice is to explain how we may use personal information we collect before, during and after your membership with us. It also explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to 'we', 'our' or 'us' in this privacy notice are to the **Saffron Walden Swimming Club**.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Secretary secretary@saffronseals.org.uk has overall responsibility for data protection compliance in our organisation.

1. **Personal information we may collect from and/or about members**

- personal contact details such as full name, email addresses, telephone numbers
- date of birth
- membership start and end date
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us
- records of your attendance at training and swimming events hosted by us or other Swim England clubs or organisations
- performance records during training and or other swimming events
- images in video and/or photographic form
- your marketing preferences so that we know whether and how we should contact you
- details of contacts for family members, guardians and emergency contacts
- any disciplinary and grievance information

2. **Special categories of personal information**

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding members:

- information about your health, including any medical condition, health and sickness records, medical records and health professional information
- information about your ethnicity, religious beliefs, and sexual orientation

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis
- it is necessary for the establishment, exercise or defence of legal claims
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law, or
- based on your explicit consent

In the table below we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

3. How we collect your information

We collect personal information about our members when you apply to become a member of the club and from the member's annual registration document, but this may also be updated during the course of any membership.

If you are providing us with details of next of kin, guardians and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with them. They also have the same rights as set out in the “Your rights in relation to personal information” section below.

4. How your information may be used

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you information including details about competitions and events, partner offers and discounts relating to swimming.	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other marketing information we think you might find useful or which you have requested from us.	Contact details and marketing preferences.	Where you have given us your explicit consent to do so.
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint-handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our club and in some cases we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to

		<p>in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
For the purposes of promoting the club, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements	Records of attendance, medical information about your health	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
To administer your attendance at any events, courses, or additional training opportunities.	All contact and membership details, transaction and payment data.	This is necessary to enable us to register you on to and properly manage and administer your attendance on the event, course, or training.
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.	Health and medical information	We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
For the purposes of equal opportunities monitoring	Name, title, date of birth gender, information about your race or ethnicity and health and medical information	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>

To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
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For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting secretary@saffronseals.org.uk

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

5. Disclosure of your personal information

We share personal information with the following parties:

- Any party approved by you
- To any governing bodies or regional bodies for the sports covered by our club: to allow them to properly administer the sports on a local, regional and national level
- The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security

6. Direct marketing

Email, post and SMS marketing. From time to time, we may contact you by email with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can let us know at any time that you do not wish to receive marketing messages by emailing us at secretary@saffronseals.org.uk

7. Transferring your personal information internationally

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws.

8. How long do we keep your personal information for?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information

may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months, unless you confirm that you wish to re-apply.
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can do this by emailing secretary@saffronseals.org.uk

9. Your rights in relation to personal information

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used
- the right to access the personal information we hold about you
- the right to request the correction of inaccurate personal information we hold about you
- the right to request the erasure of your personal information in certain limited circumstances
- the right to restrict processing of your personal information where certain requirements are met
- the right to object to the processing of your personal information
- the right to request that we transfer elements of your data either to you or another service provider
- the right to object to certain automated decision-making processes using your personal information

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's Office website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us at secretary@saffronseals.org.uk.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

10. Changes to this notice

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

11. **Contacting us**

In the event of any query or complaint in connection with the information we hold about you, **please email secretary@saffronseals.org.uk**

SWSC Data Protection Policy

GDPR 1.0 25th May 2018