



## Swindon Dolphin ASC

### Privacy Policy – November 2022

We at Swindon Dolphins ASC want to make sure that all the personal details we hold about you are safe and secure; the privacy and security of your data is extremely important to us. This privacy policy explains what data we collect as well as how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

References to We, Our, or Us, in this privacy notice are to Swindon Dolphin ASC

We are, what is known as, **a data controller**. This means we have control over how your details are used and who we pass them to. Sometime organisations like ours need to appoint an individual called a "**Data Protection Officer**" to make sure that we are being very careful with your information. We don't need to have Data Protection Officer, but we have decided that the Committee will make sure your details are safe. They can be contacted via [Secretary@swindondolphin.co.uk](mailto:Secretary@swindondolphin.co.uk) in case you have any questions.

We'll always protect your personal data and if there are any further changes to the 'General Data Protection Regulation' (GDPR) or related laws then we may need to review or amend this statement in the future. The latest version of our privacy policy will always be displayed on our website [www.swindondolphinasc.co.uk](http://www.swindondolphinasc.co.uk)

The Data Protection Act 2018 controls how your personal information is used by organisations and is the UK's implementation of the EU's General Data Protection Regulations (GDPR).

Everyone responsible for using personal data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit and legitimate purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

This notice applies to athletes, parents/guardians, coaches and volunteers if you have registered to become, or are, a member of our club. It explains:

- how we may use the personal information we collect before, during and after your membership with us.
- what your rights are for the purposes of data protection.
- how we comply with the law on data protection.

We'll never sell your personal data. We only share it with organisations we work with who meet our high privacy standards.



## 1. The types of information we collect

We will collect and use your personal data (this means any information which identifies you, or which can be identified as relating to you personally, such as your name, address, phone number, email address or member number). We'll only collect the personal data we need.

- personal contact details that allow us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- records of your attendance at any events hosted by us;
- identification documents such as passport and identity cards;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any swimmer rankings, gradings or ratings, competition results, details regarding galas attended and performance;
- Any feedback you provide in a survey;
- use of and movements through our online system Swim Club Manager (SCM), passwords, personal identification numbers, user-names and other IT system identifying information;

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.

There may be other personal information that you are not obliged to provide to us, but if you do not provide it then we may not be able to properly perform our contract with you.

You can withdraw your consent and request erasure of your data at any time prior to the completion of your membership application which you may do by contacting us as described above.

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 us as described above.

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.



## 2. Special categories of personal data

We may also collect, store and use the following 'special category data' about you:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- medical information about you which is collected purely for the purpose of ensuring your health and safety when competing and which will not be transferred to any third party save as specifically authorised by you, or in a medical emergency.
- information about any relevant impairments that you may have.

We may not collect all of the above types of 'special category data' about you however, if we do process such data, it will be 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.

For volunteers we may also collect criminal records information from/about you, this will be completed by the use of the Disclosure Barring Service.

### Aged 16 or under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

## 3. Where we collect your data

We typically collect personal information about our members when you apply to become a member of the club, when you take part in a competition controlled either by us or by another organisation, when you work as a volunteer for us, or when you purchase products and services from us, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

In becoming a registered athlete, coach, official or volunteer, you will provide certain information to third parties including Swim England, Swim England South West Region, Institute of Swimming, and British Swimming. This information may be shared with us.

If you are providing us with details of next of kin, family members 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 those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the "**Your rights in relation to personal information**" section below.



#### 4. How and why your information is used

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

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

- Your consent - where you have provided specific consent to us using your personal information in a certain way.
- We have a legitimate Interest - to send information on activities and events which have been arranged as part of membership.
- We have a contractual obligation - performance of a contract, to allow us to provide member services associated with the day to day running of the club and its activities such as requests for payments, registers, and fees.
- We have a legal obligation - to fulfil legal obligations for health and safety, insurance and child protection purposes.

Purpose	Personal Information Used	Lawful Basis
Administer membership and maintain relationship, including dealing with any enquiries made by you.	Contact and membership details, transaction and payment information, records of your interactions with us and	<ul style="list-style-type: none"> <li>•To perform our contract with you</li> <li>•To pursue legitimate interests</li> </ul>
To deal with your queries or complaints	Contact details, records of your interaction with us.	To pursue legitimate interests
Retention of records	All the personal information we collect	<ul style="list-style-type: none"> <li>• We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to.</li> <li>•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 any account you have with us and in some cases, we may have legal or regulatory obligations to retain records.</li> <li>•For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</li> </ul>
Data analytics – record keeping, research and analysis	Records of attendance and performance at events or competitions	To pursue legitimate interests.
Promotion of club activity and athlete success	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	Contact and membership details. special category information.	<ul style="list-style-type: none"> <li>•To perform our contract with you</li> <li>•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.</li> <li>• We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to.</li> </ul>



...teaching and developing swimmers to their full potential

Ensure safeguarding and wellbeing of members in relation to medical history	Contact and membership details. special category information. DBS information.	<ul style="list-style-type: none"> <li>• We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to.</li> <li>• For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</li> </ul>
For the purpose of equal opportunities monitoring	Contact and membership details. Special category data.	<ul style="list-style-type: none"> <li>• To pursue legitimate interests.</li> <li>• We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to.</li> </ul>
Maintain contract requirements for employed members	Contract of Employment.	<ul style="list-style-type: none"> <li>• To perform our contract with you.</li> <li>• To pursue legitimate interests.</li> <li>• To comply with legal obligations.</li> </ul>

## 5. Disclosure of your personal information

Personal information may be shared with the following:

- Any party approved by you;
- To the governing body (Swim England) or regional body or county affiliation to allow them to properly administer the sport on a local, regional and national level;
- Other service providers and advisors: for example, payment processes, professional advisors, data analysis and IT services (including CRM, website, video and teleconference services);
- External funding providers;
- Our Partners and Activity Providers;
- 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.

In addition to this, any event which you enter may process and hold personal data which is required for you to participate.

This policy does not cover how your data is processed in relation to external bodies.

## 6. Transferring your data internationally

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

## 7. Retention of personal information

The duration for which personal information is retained will differ depending on the type of information and the reason why it is collected 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 are no legal requirements, we retain all physical and electronic membership account records for a period of 7 years after your last contact with us.





Exceptions to this rule are:

- Any financial/accounting information will be held for a period of 6 years after the end of the financial year.
- Minutes of all meetings will be retained for a minimum of 6 years.
- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months.
- Information that may be relevant to personal injury claims or discrimination claims which 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 might not start to run until a long time after the event.
- We will continue to store individuals' performance data which form part of the club's competitive records.
- Video and images for historical or promotional purposes (where we have permission from the data subject or parent/carer as applicable).

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 may be able to update some of the personal information we hold about you through the 'Contact Us' details given above.

### Your rights in relation to personal information

Under data protection law, you have rights including:

- Your right of access** - You have the right to ask us for copies of your personal information.
- Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [secretary@swindondolphin.co.uk](mailto:secretary@swindondolphin.co.uk) if you wish to make a request.

### 8. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at [Secretary@swindondolphin.co.uk](mailto:Secretary@swindondolphin.co.uk)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>