



## PRIVACY NOTICE FOR OUR MEMBERS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you have registered to become or are a member of our club. This notice 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 club as a whole or the committee that provides the over-arching governance.

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 Information Governance Officer has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

### 1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows 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;
- use of our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events hosted by us;
- records of your attendance at any events hosted by other clubs and organisations;
- images in video and/or photographic form and voice recordings;
- identification documents such as passport and identity cards which we may require for the purposes of attending of overseas events such as training camps;
- membership details provided by the governing body (Swim England)
- details of any memberships of other aquatics clubs;
- details of next of kin, family members, doctors, coaches and emergency contacts;
- records and assessment of any athlete rankings, grading or ratings, competition results, details regarding events/matches/competitions attended and performance;
- 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 you:

- information about your race or ethnicity, and
- information about your health, including any medical condition, health and sickness records, medical records and health professional information that can be considered relevant to you participating in training programmes and competing whilst you are a member of the organisation.

In relation to the special category personal data that we process we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis;

- based on your explicit consent.

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

### 3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you apply to become a member of the club, you request an account with us at [www.keynshamswimmingclub.co.uk](http://www.keynshamswimmingclub.co.uk), when you attend an event or competition hosted by us or by another club, when you purchase any equipment or kit we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you from Swim England as part of your application process.

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 the extent of the 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. USES MADE OF YOUR PERSONAL INFORMATION

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
<b>To administer the membership you have with us and manage our relationship with you, including dealing with payments and any enquiries made by you.</b>	All contact and membership details, transaction and payment information, records of your interactions with us.	This is necessary to enable us to manage and administer your membership contract with us properly.
<b>To ask you for help from time to time to ensure that the club is financially viable and is run in accordance with the standards required by the national governing body.</b>	Contact and membership details	We have a legitimate interest in ensuring that the club is sustainable and that its activities are run safely.
<b>To alert you to, and arrange and manage any contracts for the participation in competitions, entry to which is administered by us, and to send you details relevant to your participation in those competitions.</b>	Contact and membership details, transaction and payment information. Details of Swim England membership and performance data. Records of your interactions with us.	We have a legitimate interest in ensuring that you compete regularly as part of your training Programme, and representing the club both in individual and team competitions. This is necessary to enable us to administer and monitor properly the contracts we establish to enable you to participate in competitions.
<b>To send you information which is included within your membership, including details about advanced ticket information, competitions and events, and any essential updates issued by British Swimming, Swim England, Swim England South-West and county associations.</b>	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.

<b>To answer your queries or complaints</b>	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.
<b>Retention of records</b>	All the personal information we collect.	<p>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.</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>
<b>The security of our IT systems</b>	Your usage of our online portal.	We have a legitimate interest to ensure that our IT systems are secure.
<b>To conduct data analytics studies to better understand event attendance and trends within the sport</b>	Records of your attendance at any events or competitions hosted by us or entered by us as a club.	We have a legitimate interest in doing so to ensure that the competitive opportunities offered to our membership are relevant.
<b>For the purposes of promoting the club, our events and membership packages.</b>	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
<b>For the purposes of promoting significant achievements by you, particularly in competition.</b>	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
<b>To administer your attendance at any courses or programmes you sign up to</b>	<p>All contact and membership details, transaction and payment data.</p> <p>Details of Swim England membership and performance data.</p>	This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or programme.
<b>To arrange for any trip or transportation to and from an event</b>	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.</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>

<b>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.</b>	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.
<b>To gather evidence for possible grievance or disciplinary hearings</b>	All the personal information we collect	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.  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.
<b>For the purposes of equal opportunities monitoring</b>	Name, title, date of birth gender, information about your race or ethnicity and health and medical information	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.  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.

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 prescribed manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the “Contacting us” section below.

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. DIRECT MARKETING

We will not undertake any direct marketing and we will not provide you with information about products and services. Where we send you details of relevant future competitions we will do so on the basis that this forms part of our membership contract with you. Where we send you essential information as issued by national, regional and county bodies we will do so on the basis that it is in our legitimate interest to ensure that you are kept abreast of such essential information as rule changes and changes in procedures etc.

## 6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We may share personal information with the following parties:

- **Any party explicitly approved by you.**
- **The national, regional and county governing bodies for the disciplines covered by our club** to allow them to administer the sports properly on a local, regional and national level;
- **Organisers of competitions** so that they can process your entry to that competition;
- **Other service providers**: for example, payment processors, data analysts, promotional advisors, sponsors, contractors or suppliers and IT services (including website hosting services);
- **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.
- **Media organisations** usually in the aftermath of significant performances in competition, or selection to national talent programmes or squads.
- **Travel companies/airlines** for the purposes of arranging travel to overseas competitions or training camps

## 7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect is held on IT systems which are either based in the UK, or (in the case of the Team Unify web platform) held in data centres operated by Amazon Web Services. In accordance with the General Data Protection Regulation, the agreement between TeamUnify and Amazon Web Services contains standard contractual clauses recognised by the Information Commissioner which enable TeamUnify to host data legally in the EEC area for UK-based organisations like **KASC**. Data is not transferred to and stored outside the UK with the single exception outlined in the following paragraph.

In the specific case where you enter an international competition, the personal information we collect may be transferred to and stored in countries outside of the UK. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction in which you currently reside. 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. For further details please contact us by using the details set out in the "Contacting us" section below.

## 8. HOW LONG DO WE KEEP PERSONAL INFORMATION?

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 months after your last contact with us following the end of your membership. Exceptions to this rule are:

- Financial records will be retained for a period of six years following the end of financial year in which the last activity was recorded;
- It is in the club's legitimate interest to retain competitive performance results indefinitely, particularly for the purposes of maintaining club records;
- 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 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.

## 9. ACCURACY OF INFORMATION WE HOLD

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 our web site. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

## **10. 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 organisation; and
- 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 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 by using the details set out in the "**Contacting us**" section below.

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

## **11. 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 version 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.

## **12. CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [kascinfogov@keynshamswimming.club](mailto:kascinfogov@keynshamswimming.club)

**Version dated 21 May 2020**