



## PRIVACY NOTICE FOR OUR VOLUNTEERS

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 relationship with us a volunteer. This notice applies to current and former volunteers and this notice is not a contract of employment or other contract to provide services. 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 to the committee which 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

When you sign up to become a volunteer with us, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses and emergency contact details;
- date of birth;
- gender;
- details of family members and emergency contacts;
- bank account details for payment of any out of pocket expenses;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- records of your volunteering history;
- any identification documents;
- all information included as part of the volunteering application process;
- referee details and any references provided;
- performance including any feedback provided to us by yourself, members of staff or other third parties;
- the location in which you are volunteering;
- use of our web site, personal identification numbers, IP addresses, user names and other IT system identifying information;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you;
- 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;
- 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 volunteering with 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;
  - 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 from you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

### 3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our volunteers through the membership process, either directly from you, or sometimes from a third-party agency such as Swim England. We may sometimes collect additional information from third parties including former clubs or other organisations you may have volunteered for or via background check agencies. We will also collect additional personal information throughout the period of you volunteering with us and 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 any third party references you provide as part of the application process for becoming a volunteer or from any feedback provided to us about your performance as a volunteer.

If you are providing us with details of referees, 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. 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.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b>Non- ‘special categories’ of Personal Information</b>		
<b>Making a decision about your appointment as a volunteer and managing the appointment process</b>	All the personal information we collect from you as part of the application process. Records of volunteering history. Records of qualifications. Referee details and any references.	We need this information to be able to perform and administer your contract with us as a volunteer.
<b>To produce and maintain our website and any external marketing campaigns in order to promote volunteer opportunities and to recognise the value created by our volunteers across the aquatics disciplines in the south west</b>	Images in video and/or photographic form and voice recordings	Where you have given us your consent to do so.
<b>Paying you for any out of pocket expenses</b>	Transaction and payment information.	We need this information to make any out-of-pocket expense payments to you.

<b>Assessing experience for a particular role or task</b>	Records of your volunteering history.  Details of your qualifications. All information included as part of the volunteering application process.	We have a legitimate business interest to ensure that our volunteers are suitable for the role.
<b>Dealing with legal disputes involving you, or any other volunteers, including accidents</b>	All non-'special categories' of personal information	We have a legitimate business interest to ensure that all legal claims are managed effectively.  We also have a legal obligation to report any accidents at a workplace in accordance with health and safety laws.
<b>To prevent and detect criminal or improper acts</b>	Identification documents	We may have a legal obligation to do so, otherwise we have a legitimate business interest to protect our organisation against criminal or improper acts.
<b>Storage of records relating to you and also records relating to our organisation</b>	All non-'special categories' of personal information	We need this information to be able to fulfil our contract with you.
<b>To send you information we think you might find useful or which you have requested from us, including our newsletters, information about volunteering opportunities and other ways of supporting KASC, or the sport, provided you have indicated that you are happy to be contacted for these purposes.</b>	Personal contact details such as name, title, email addresses and telephone numbers	Where you have given us your consent to do so.
<b>To arrange and administer your attendance at an event for which you have volunteered to help</b>	Personal contact details. Details of family members and emergency contacts.	We need this information to be able to set up the contract you have with the event organiser.
<b>For the purposes of equal opportunities monitoring</b>	Name, title, date of birth; gender, location of volunteering.	We may have a legal obligation to do so and we have a legitimate interest in doing so to make sure our organisation is offering fair volunteering opportunities to everyone.
<b>To assess your performance as a volunteer</b>	Performance including any feedback provided to us by yourself, members of staff or other third parties.	We have a legitimate interest to ensure your suitability for any future volunteering roles and to ensure that your volunteering experience with us is positive and worthwhile.
<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>‘Special categories’ of Personal Information and Criminal Records</b>		
<b>Storage of records relating to you and also records relating to our organisation.</b>	All ‘special categories’ of personal 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>For drug and alcohol testing and to assess your suitability for any activities or events we host.</b>	Information about your health, including any medical condition, health and sickness records, medical records and health professional 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 use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to provide appropriate adjustments to our expectations, and to our equipment.</b>	Information about your health, including any medical condition, health and sickness records, medical records and health professional 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 comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b>	Information about your criminal convictions and offences.	For criminal records history we process it either on the basis of legal obligations or based on your explicit consent depending on the role for which you have volunteered.

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 volunteer or we may not be able to properly perform our arrangements with you or comply with legal obligations and we may have to terminate your position as a volunteer. 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 arrangements with you as a volunteer.

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 benefits to you as a volunteer.

## 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 events we will do so on the basis that this forms part of our volunteering 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 share personal information with the following parties:

- **Any party 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 events** at which you have agreed to be a volunteer so that they can administer their event safely;
- **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.
- Providing references to future employers, or organisations you may wish to volunteer for.
- **Media organisations** usually in the aftermath of significant performances in competition by our athletes;
- **Travel companies/airlines** for the purposes of arranging travel to overseas competitions or training camps at which you have agreed to be a volunteer.

We do not disclose personal information to anyone else except as set out above.

## 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 apply to volunteer at 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 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 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.
- Information that may be relevant to personal injury claims may be retained until the limitation period for those types of claims has expired. For personal injury claims this can be an extended period as the limitation period might not start to run until a long time after you have volunteered for us.

## 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 or your local data protection regulator. 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 [kascinfo@keynshamswimming.club](mailto:kascinfo@keynshamswimming.club)

**Version dated 21 May 2020**