



## Worsley Amateur Swimming Club

### 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.

We have appointed Michelle Grovestock as our club Data Protection Officer to oversee our compliance with data protection laws; Michelle will have overall responsibility for data protection compliance in our club and details on how to contact her are in the “Contacting Us” section at the end of this privacy notice.

#### 1. **Personal Information we may collect from you**

As part of your initial enquiry with us, and then your subsequent membership when you join us, we may obtain **personal information** about you, such as:

- 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, this is required for insurance purposes;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- personal cheque details you provide so that we can receive payments from you;
- records of galas or events you may attend;
- images in video and/or photographic form;
- your marketing preferences so that we know whether and how we should contact you;
- identification documents such as passport and identity cards (should you volunteer with us and require a DBS check or Safeguarding training);
- details of any other club membership;
- details of next of kin, family members, and emergency contacts;
- records of any achievements, swim times, competition results, details of events/galas attended and performances;
- Any complaints, 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 conditions or disabilities. This will ensure the safety and wellbeing of all members within the club.

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 vital interest, on a lawful basis;

- it is necessary for the establishment, exercise or defence of legal claims;
- 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.

If you are providing us with details of family members and emergency contacts they have a right to know and to be aware of 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 the 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>To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service, kit or club related enquiries made by you</b>	All contact and membership details, transaction and payment methods, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership with us.
<b>To send you information which is included within your membership including details about competitions and events, training schedules and club related information</b>	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership with us.
<b>To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events, kit and any other club related information</b>	Contact details and marketing preferences.	Where you have given us your explicit consent to do so.
<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.	We have a legitimate interest in retaining records whilst they may be

		<p>required in relation to complaints or claims. We need to retain records for a period of 6 years 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>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, or attended, by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and 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>To comply with health and safety requirements</b>	Records of attendance and 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>
<b>To administer your attendance at any Galas or Competitions you sign up to</b>	<p>All contact and membership details, transaction and payment data.</p> <p>Details of any County membership and performance data.</p>	This is necessary to enable us to register you on to sports software for gala entries and properly control and manage your attendance at competitions.
<b>To use information about your disabilities, health and medical history physical (including any injuries) to ensure your health and safety</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.
<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 on the basis of legal obligations or based on your explicit consent.
<b>Personal information may be required to be passed to a 3<sup>rd</sup> party (e.g. the ASA (Swim England))</b>	Name, date of birth, gender, address, contact details.	This information is required to be provided to the ASA (Swim England) for insurance purposes (e.g. member will obtain either a category 1, 2 or 3 membership).

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 comply with legal obligations and we may have to terminate your membership.

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 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**

**Email, Post, Phone and Social Media:** from time to time, we may contact you by email, post, phone or social media 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 then let us know at any time that you do not wish to receive marketing

messages. You can also unsubscribe from our communications by clicking on the unsubscribe link in the messages we send to you.

#### 6. **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.
- **Other service providers:** for example kit suppliers.
- **Commercial Partners:** for example any swim related offers or promotions that become available to the club and its members.
- **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.

#### 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.

#### 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 will retain all physical and electronic records for the lifetime that you are a member of the club plus an extension period of 6 years after your last contact with us, or the end of your membership. Exceptions to this rule are:

- 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.
- Any information relating to Child Protection or Safeguarding issues.
- ASA records where discrepancies occur may be retained for a longer period as required.
- Financial records where required.

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 contact us by using the details set out in the "Contacting us" section below.

#### 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; 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.

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 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.

11. **Contacting Us**

In the event of any query or complaint in connection with the information we hold about you, please email Michelle Grovestock at [Worsleyasc@outlook.com](mailto:Worsleyasc@outlook.com)