



# Privacy Policy

## Cleethorpes and District Swimming Club Ltd.

Cleethorpes and District Swimming Club (the Club) adopts all contractual policies and procedures defined by their governing body the Amateur Swimming Association (Swim England).

### 1. Principles

The Club is committed to protecting and respecting the privacy of you (member) and will ensure that any personal data provided for the purposes of membership is responsibly stored by the Club (data controller) and in addition, ensure your data is stored and managed in a fair, lawful, secure, and transparent way.

### 2. What personal data we hold on you.

You may provide us with personal information by filling in forms for an event, online, or by corresponding with us by phone, e-mail or otherwise. This includes the information you provide when you join the Club and thereafter every year when annual membership is renewed. The information you provide may include:

- Personal contact details (name, title, email addresses and contact numbers)
- Date of birth.
- Gender.
- Home address.
- Bank account details.
- Swim England membership number.
- Name of the Swim England affiliated clubs with which you are registered.
- Images in video and/or photographic form.
- Identification documents such as passports and identify cards.
- Details of next of kin, family members and emergency contact details.

The Club may also ask for relevant 'Special Category Personal Data'. This includes (but is not limited to) health information, SEN and disability, data which will only be shared to ensure the safe participation in club activities.

If you (member) are providing the Club (data controller) with details of next of kin, family members and emergency contact details (third party) they have a right to know and to be aware of the personal information we hold, how we collate it and how we use and share that information.

Therefore, to ensure we provide transparency to all we ask that you (member) share this privacy notice with those (third parties) whom you feel are sufficiently mature to understand it.

### 3. Why we need your data.

The reason we need your Swimmer Data is to be able to administer your membership and provide the membership services you are signing up to when you register with the Club. Our lawful basis for processing your personal data is that we have a contractual obligation to you as a 'member' to provide the services you are registering for.

Reasons we need to process your data include:

**Training and competition entry.**

- Sharing personal data with club coaches to administer training sessions.
- Sharing personal data with club coaches and team managers for event days.
- Sharing personal data with event promoters to facilitate entry into events.
- Sharing personal data with Fixtures Officer to communicate and facilitate gala entries.

**For funding and reporting purposes.**

- Sharing anonymised data with a funding partner as condition of Grant Funding.
- Analysing anonymised data to monitor club trends (e.g. areas of recruitment.)
- Carrying out surveys to monitor your experience as a club member.

**For membership and club management.**

- Processing of membership forms and payments.
- Sharing data to provide information about club activities, membership renewals or invitation to events.
- Club media, sponsors, partners promoting the club and newsletters.
- Publishing of race and competitions results.

**Marketing and communications (where separate consent is provided)**

- Sending information about promotions and offers from sponsors.
- Sending information about selling club kit, merchandise, or fundraising.

**Special Personal Data**

Any special category health data we hold is only processed for the purpose(s) of passing health data to Coaches / Team Staff to allow safe running of training sessions, event entry or away trips. We process this data on the lawful basis of consent. Therefore, we will need your explicit consent to process this data, which we will ask for at the point of collecting it.

#### 4. Social Media

The Club may use Social Media including Facebook, Twitter and Instagram, groups which hold an age restriction of 13, with members above this age limit free to join and follow these pages which are open to the general public.

In addition, the club holds a 'closed' Facebook Page used solely for membership / parents, with entrance granted to current members of the club age 18 or over (or current Club Captains if under 18 and deemed appropriate).

If you join one of our club social media pages, please note that the provider of the social media platform(s) has their own privacy policies which underpin any usage via social media and therefore the club cannot accept any responsibility or liability for these individual policies.

It is recommended that members check these individual policies before submitting any personal data onto the club's social media pages.

## 5. Who we share your personal data with.

When you become a member of or renew your membership with the Club you will automatically be registered as a member of Swim England. We will provide Swim England with your personal data which they will use to enable access to an online portal for you (OMS/Integra).

Swim England will contact you to invite you to sign into and update your MyAthletics portal (which, amongst other things, allows you to set and amend your privacy settings).

It is vital, therefore, that a valid email address is given, so that you can ensure that your data is correct and so that you can set your own privacy settings. If you have any questions about the continuing privacy of your personal data when it is shared with Swim England, the club asks that you please contact [membershiprenewals@swimming.org](mailto:membershiprenewals@swimming.org)

The Club will not supply any personal data it holds on you to any other third party without your explicit consent. The club's data processing may require your personal data to be transferred outside of the UK for cloud hosting. Where the club does transfer your personal data overseas it is with the appropriate safeguards in place to ensure the security of that personal data. Full details of the OMS Digital Privacy Policy can be found via your membership log in.

## 6. How long will we hold your personal data?

We will hold your personal data on file for as long as you are a member with us with membership data updated every year on annual membership forms. Any personal data we hold on you will be securely destroyed after inactivity on that member's account, in line with Swim England data retention policy. Your data is not processed for any further purposes other than those detailed in this policy.

### Your rights regarding your personal data:

The General Data Protection Regulation (GDPR) provides the following rights for individuals.

1. The right to be informed.
2. The right of access.
3. The right to rectification.
4. The right to erasure.
5. The right to restrict processing.
6. The right to data portability.
7. The right to object.
8. Rights in relation to automated decision making and profiling.

Therefore, all members have the right to access and receive a copy of their personal data or other supplementary information, and this is commonly referred to as a subject access request or 'SAR'. You can make a SAR verbally or in writing and you have the right at any time to request:

- Rectification or erasure of your personal data.
- Restrict or object to certain kinds of processing of your personal data, including direct marketing.
- Portability of your personal data.
- Raise a concern directly to the data protection supervisory authority, the Information Commissioner's Office (ICO) <https://ico.org.uk> about the processing of your personal data.

## 7. What you can ask us with regards your data.

As a member you can ask us, the data controller at any time to tell us how your details are being used, and also provide you with copies of the information we hold on you. In addition, you can correct the details we hold if they are not correct or out of date and request through a SAR that we, the data controller delete all of the details we hold on you (unless we deem to have a good reason not to.)

You also have the right to stop the Club from using your details in a certain way however, some of the rights may not always apply to the personal details we hold for you. This is due to certain requirements and exemptions attached to each piece of data which means we as the data controller need to hold certain information.

## 8. What you can ask us with regards your data.

What happens if we (the data controller) need to make changes to this notice.

We ask that you (member) review our website and policies for any changes to this notice. Any changes to said notice will show through a revised 'Version Number' cited at the top of the policy. In addition, where we are required to do so by law, we will ask for your permission before changing any reason for using your personal data.

## 9. Further Support and Advice.

The Club and Swim England will provide support and guidance for anyone who requires assistance and advice.

You can speak to the clubs:

- **Human Resources (GDPR)** [humanresources.cads@gmail.com](mailto:humanresources.cads@gmail.com)
- <https://ico.org.uk/for-organisations/guide-to-data-protection/>