

## Worcester Swimming Club Privacy Policy

Worcester Swimming Club are committed to 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 applied to join or are a member of our club as a swimmer, volunteer or employee. 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.

Children have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased. We encourage the holders of parental responsibility for children to share this policy with your children if you feel they are old enough to understand it.

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 Club Secretary 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. About this Policy

- 1.1 We may collect, use and store your personal data, as described in this Privacy & Data Protection Policy and as described when we collect data from you.
- 1.2 We reserve the right to amend this Privacy & Data Protection Policy from time to time without prior notice. When we change this notice in a material way, we will update the version date at the bottom of this page. The amendment will take effect once the revised Privacy & Data Protection Policy is available via a link on our homepage. Please refer to this Privacy & Data Protection Policy each time you submit your personal information. You are advised to check our website regularly for any amendments (but amendments will not be made retrospectively). 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.
- 1.3 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

### 2. Who are we?

- 2.1 We are Worcester Swimming Club. We can be contacted at Worcester Swimming Club - [info@worcestersc.co.uk](mailto:info@worcestersc.co.uk)

### 3. Personal Information We May Collect from You

Depending on the type of membership you register for with us, or the type of volunteer role or employee role you apply for, 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 / age related information;
- gender;
- membership start and end date;
- references and other information included in a CV or cover letter or email as part of the application process for membership;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- use of and movements through 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;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you.
- details of any county or governing body membership;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any rankings, , competition results, details regarding events/matches/games attended and performance (including that generated through player pathway programme);
- any disciplinary and grievance information;

#### 4. 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 health, including any medical condition, health and sickness records, medical records and health professional information; and

We may not collect all of the above types of special category personal information about you. 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 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 about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

5. Uses Made of The Information

- 5.1 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>TYPE OF INFORMATION</b>	<b>LEGAL BASIS OF PROCESSING</b>
<p><b>To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you</b></p>	<p>All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.</p>	<p>This is necessary to enable us to properly manage and administer your membership with us.</p>
<p><b>Contacting next of kin in the event of emergency</b></p>	<p>Emergency contact details.</p>	<p>Protecting the Member’s vital interests and those of their dependants or next of kin.</p>
<p><b>To send you information which is included within your membership benefits package, including details about advanced ticket information, competitions and events, partner offers and discounts and any updates on Swimming, Water Polo of Synchronised Swimming</b></p>	<p>Contact and membership details.</p>	<p>This is necessary to enable us to properly manage and administer your membership with us.</p>
<p><b>To send you other marketing information we think you might find useful or which you have requested from us,</b></p>	<p>Contact details and marketing preferences.</p>	<p>Where you have given us your explicit consent to do so.</p>

PURPOSE	TYPE OF INFORMATION	LEGAL BASIS OF PROCESSING
<p>including our newsletters, information about membership, events, products and information about our commercial partners</p>		
<p>To answer your queries or complaints</p>	<p>Contact details and records of your interactions with us</p>	<p>We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.</p>
<p>Retention of records</p>	<p>All the personal information we collect.</p>	<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 4 above.</p> <p>For criminal records history we process it on the basis of legal</p>

PURPOSE	TYPE OF INFORMATION	LEGAL BASIS OF PROCESSING
<b>The security of our IT systems</b>	Your usage of our IT systems and online portals.	obligations or based on your explicit consent.  We have a legitimate interest to ensure that our IT systems are secure.
<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. You may withdraw your consent at any time by contacting us by email or letter using the contact information in section "Contacting Us".
<b>To comply with health and safety requirements</b>	Records of attendance, medical information about your health	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.  We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 4 above.
<b>To administer your attendance at any courses, programmes or trips you sign up to</b>	All contact and membership details, transaction and payment data. Details of any county	This is necessary to enable us to register you on to and properly manage and administer your attendance on the

PURPOSE	TYPE OF INFORMATION	LEGAL BASIS OF PROCESSING
<p><b>To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety &amp; the safety of others and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities and to tailor teaching and communication techniques to your needs.</b></p>	<p>membership and performance data.</p> <p>Health and medical information, such as but not limited to: allergies, medical conditions e.g. asthma, epilepsy, orthopaedic problems, any current medication, special dietary requirements and / or any injuries. physical and mental disabilities &amp; impairments.</p>	<p>course and/or programme.</p> <p>Protecting the Member's vital interests and those of their dependants.</p> <p>We have a legal obligation and a legitimate interest to provide you and other Members of our Club with a safe environment in which to participate in sport.</p> <p>We process children's personal data then we on the basis of the "special category reasons for processing of your personal data" referred to in section 4 above.</p>
<p><b>To gather evidence for possible grievance or disciplinary hearings</b></p>	<p>All the personal information we collect</p>	<p>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.</p> <p>We process special category personal data on the basis of the "special category reasons for processing of your personal data"</p>

PURPOSE	TYPE OF INFORMATION	LEGAL BASIS OF PROCESSING
<p><b>For the purposes of equal opportunities monitoring</b></p>	<p>Name, title, date of birth gender, information about your race or ethnicity and health and medical information</p>	<p>referred to in section 4 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p> <p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</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 4 above.</p>
<p><b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b></p>	<p>Information about your criminal convictions and offences</p>	<p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p><b>Managing membership categories and fixtures / race entries which are age / gender specific.</b></p>	<p>Name, title, date of birth / age related information gender</p>	<p>For the purposes of our legitimate interests in operating the Club. Performing the Club’s Object as per the Club Constitution.</p>
<p><b>Provision of adequate facilities for members.</b></p>	<p>Gender</p>	<p>We have a legal obligation and a legitimate interest in</p>

PURPOSE	TYPE OF INFORMATION	LEGAL BASIS OF PROCESSING
<p><b>Managing / facilitating entry to fixtures/ race entries and race results.</b></p> <p><b>Sharing race results with other clubs and governing bodies.</b></p> <p><b>Publishing race programmes.</b></p> <p><b>Providing race results to local and national media (where media consent has been given).</b></p>	<p>The Member's name, Swim England (ASA) membership number, swim times and age related information.</p>	<p>making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender.</p> <p>For the purposes of our legitimate interests in holding races for the benefit of members of the Club.</p> <p>For the purposes of our legitimate interests in promoting the Club.</p> <p>Where you have given us your explicit consent to do so. You may withdraw your consent at any time by contacting us by e-mail or letter using the contact information in section "Contacting Us".</p>
<p><b>Creating and managing the Club's online and printed swim times. Managing Member's gala and open meet invitations.</b></p> <p><b>Determining Member nominations and presentation of awards, medals and trophies.</b></p>	<p>The Member's name and swim times.</p>	<p>For the purposes of our legitimate interests in operating the Club.</p>
<p><b>Passing to Swim England or other governing body to facilitate direct contact with the Member to administer membership of</b></p>	<p>The Member's name and e-mail address, whilst a current member and for up to a</p>	<p>This is necessary to enable us to properly manage and administer your membership with us and your membership of Swim</p>



<b>PURPOSE</b>	<b>TYPE OF INFORMATION</b>	<b>LEGAL BASIS OF PROCESSING</b>
<b>Swim England. See paragraph 7.2 below</b>	year after ceasing to be a member of the Club	England in its capacity as the national body for all forms of swimming or other future governing body.
<b>Information published on Club's website.</b>	Name, e-mail address and telephone number of each Club committee member	<p>For the purposes of our legitimate interests in operating and promoting the Club.</p> <p>We will seek the Club committee member's consent on their application form and each renewal form and the Club Officer may withdraw their consent at any time by contacting us by e-mail or letter using the contact information in section 2.1 above.</p>
<b>To answer enquiries and information requests, process and review contributions or competition entries.</b>	Information provided to us by prospective Members, website users & contributors or competition entrants or those registering to receive information.	For the purposes of our legitimate interests in operating and promoting the Club.
<b>Fulfil any contract that we may enter into for goods or services. To send further information by post or email that is specifically related to your purchase or contact you by telephone.</b>	Information provided to us by those purchasing goods or services from us.	For the purposes of our legitimate interests in operating the Club and/or performing a contract to supply goods and services.

- 5.2 If you are providing us with details of referees, next of kin, beneficiaries, 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 section “Your rights in relation to personal information” section below.
- 5.3 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 any obligations to 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 any obligations to you.

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

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.

## 7. Disclosure of Your Personal Information

- 7.1 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 sports clubs hosting events: to allow them to properly administer the sports on a local, regional and national level.
  - Other service providers: for example, email marketing specialists, payment processors, contractors or suppliers and IT services (including CRM, website, video and teleconference services);
  - Our supply chain partners and sub-contractors, such as couriers, import/export agents, shippers: to deliver goods or information to a name & address provided by you.
  - Our Commercial Partners: for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners where you have given your express for us to do so.

- 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.

We do this for the purpose of our legitimate interests in operating the Club, for performing the Club's Object as per the Club Constitution, or when required by law, government or our regulators. We disclose only the personal data that is necessary for the third party to deliver the service or requirement.

- 7.2 Where we pass personal information to the above parties, this will be handled in accordance with section 12 below". The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. 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 you are typically resident in. 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. We periodically review all non-EEA based third party service providers to ensure they provide an adequate level of protection as per Article 45(1) of the GDPR to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (sub-processors) to process your data. Where this is the case third parties will be required to have contractual arrangements with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes. For further details please contact at [membership@worcestersc.co.uk](mailto:membership@worcestersc.co.uk)
- 7.3 Swim England membership. Once an application form is received by the Club, you will receive an email from Swim England instructing Member's to complete the Swim England membership form. This must be done before Member's start swimming as a Member, and all monies must have been received. Any personal data submitted to Swim England directly by the Member will be governed by the Swim England privacy policy as available on their website at the time of form completion and subsequent notified revisions.

## 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 years after your last contact with us or the end of your membership. Exceptions to this rule are:

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.

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 by contacting the Membership Secretary by using the details set out in the "Contacting us" section below.

#### 9. Your right to access information

You have the right to access the information that Worcester Swimming Club holds about you. In order to do this, please make a written application to the Club Secretary, at the following address: – Club Secretary, Worcester Swimming Club [secretary@worcestersc.co.uk](mailto:secretary@worcestersc.co.uk). Worcester Swimming Club may require you to provide verification of your identity to provide a copy of the information that it holds.

#### 10. Cookies, Web Beacons, Spotlight Tags

Cookies are pieces of information that a website transfers to your computer's hard disc for record keeping purposes. Cookies can make the web more useful by storing information about your preferences on particular sites, thus enabling website owners to provide more useful features for their users. They contain no name or address information or any information that will enable anyone to contact you via telephone, email or any other means. Most browsers are initially set to accept cookies. If you would prefer, you can set your browser to disable cookies or inform you when they are set. Information on how to disable cookies can be obtained by referring to either your Operating Systems Manual or your Browser Guide, or by contacting your Internet Service Provider. However, given that we may sometimes use cookies you may not be able to take full advantage of our website if you do disable them. Worcester Swimming Club web pages may contain electronic images, known as web beacons or spotlight tags. These enable Worcester Swimming Club to count users who have visited certain pages on our website. Web beacons and spotlight tags are not used by us to access your personal information, they are simply a tool we use to analyse which web pages customers view, in an aggregated manner.

#### 11. Links

Our site may contain links to other sites. Please be aware that we are not responsible for the privacy practises of these sites. We encourage our users to be aware when they leave our site and to read the privacy statement on those sites. This Privacy & Data Protection Policy does not apply to information collected on third party sites.

#### 12. How we protect your personal data

- 12.1 Your personal information will be held in EEA countries or in countries where the European Commission has decided that the country ensures an adequate level of protection, for example where a service provider has self-certified to the standards set out in the EU-U.S. Privacy Shield.
- 12.2 We have implemented generally accepted standards of technology and operational security to protect personal data from loss, misuse, or unauthorised alteration or destruction.

- 12.3 We always transfer data over TLS/SSL secure connection. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 12.4 For any payments which we take from you online we will use a recognised online secure payment process. Card details are never entered on our web server.
- 12.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.
- 12.6 We securely destroy all financial information once we have used it and no longer need it.

### 13. 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.

## Contacting Us

For more details, please address any questions, comments and requests regarding our data processing practices to our Club Secretary, Worcester Swimming Club, [secretary@worcestersc.co.uk](mailto:secretary@worcestersc.co.uk).