

Poynton Dippers Swimming Club

DATA PRIVACY NOTICE

Poynton Dippers Swimming Club [“The Club”] as a Data Controller, declares its commitment to comply with all current and anticipated Data Protection laws applicable to the UK.

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 Poynton Dippers Swimming Club.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws since as we not required to do so, but all enquiries, issues or concerns in connection with Data Protection matters can be raised in the first instance with the club Membership Secretary.

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, address, 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;
- details of 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 or attended by us;
- images in video and/or photographic form
- your marketing preferences so that we know whether and how we should contact you.
- details of any other club membership
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any rankings, grading or ratings, competition results, details regarding events attended and performance
- any disciplinary and grievance information;
- details of teaching and coaching qualifications (where relevant to role)

The **Lawful Basis** for processing this data is the necessary pursuit of The Club’s legitimate interests. Put simply, it is necessary to enable us to properly manage and administer your membership contract with the club.

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 ethnicity,
- information about your health, including any medical condition, health and sickness records, medical records and health professional information relevant to participation in swimming events
- details of DBS checks and safeguarding qualifications (where relevant to role)

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;
- and for the protection of the vital interests of those Members.

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.

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 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.

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.

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing our relationship with you, including dealing with payments and any enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you information which is included within your membership benefits package, including details about competitions and events, and any updates concerning swimming	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.

To answer your queries or complaints	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.
Retention of records	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> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the club, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To administer your attendance at any courses or programmes you sign up to	<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 and properly manage and administer your attendance on the course and/or programme.
To arrange for any trip or transportation to and from an event	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>

<p>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.</p>	<p>Health and medical information</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>
<p>To gather evidence for possible grievance or disciplinary hearings</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” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p>For the purposes of equal opportunities monitoring</p>	<p>Name, title, date of birth gender, information about your race or ethnicity and health and medical information</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 2 above.</p>
<p>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</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>

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 comply with our 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.

DIRECT MARKETING

We do not engage in direct marketing activities and will not share your details for this purpose.

DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- Any party approved by you.
- To Swim England, our governing body: to allow them to properly administer the sport on a local, regional and national level.
- Swim times are shared with event organisers in order to allocate appropriate events in galas.
- Police, law enforcement and security services: to help them with any investigation or prevention of crime.

TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect may be transferred to and stored in countries either in the European Union or in compliance with the EU-U.S. Privacy Shield Framework. For further details please contact us by using the details set out in the "Contacting us" section below.

HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

We collect personal details from you for the purposes of administering the club and maintaining club records. We will keep these records indefinitely unless you request otherwise.

It is important to make sure that the details we hold about you is accurate and up-to-date, so make sure you let us know if anything like your email address or phone number changes. You can normally do this through our membership portal or by contacting us via email.

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.

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.

CONTACTING US

If you have a question or a complaint, you can always get in touch with one of our team. All enquiries, issues or concerns in connection with Data Protection matters can be raised in the first instance with the club Membership Secretary: membership@poyntondippers.com