

Inverness Amateur Swimming Club Privacy Notice



Data controller: Inverness Amateur Swimming Club (IASC)

NOTE: The wording in this document reflects the requirements of the General Data Protection Regulation (GDPR), which came into effect in the UK on 25 May 2018.

IASC collects and processes personal data relating to its members, volunteers and coaches to manage the swimming relationship. IASC is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What we need

Inverness Amateur Swimming Club will be a 'controller' of the personal information you provide unless otherwise stated.

IASC is affiliated with Scottish Amateur Swimming Association (SASA).

Members' personal data:

When you register as a member of IASC or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following personal information:

- contact details – name, address, email address, phone numbers, date of birth, photos, etc.;
 - membership criteria / category – athlete, parent, volunteer, etc.;
 - participation details – for example, parent, athlete, etc.;
 - details of medical conditions, medication and medical consent;
 - any other personal information, for example, PVG membership, qualifications of officials, etc.
- Volunteers' personal data:**

When you volunteer with IASC, we will ask you for the following personal information:

- contact details – name, address, email address, phone numbers, date of birth, photos, etc.;
- participation details – for example, parent, committee, etc.;
- any other personal information, for example, PVG membership, qualifications of officials, etc.

Why we need your personal information – contractual purposes

Members' personal data:

We need to collect our members' personal information so that we can manage your membership. We will use our members' personal information to:

- send you membership communications by email in relation to essential membership services, including but not limited to, general meeting notices, membership renewals, membership fees' information, swim meets etc.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above membership services and benefits.

Volunteers' personal data:

When you book a place with us for and attend a coaching course, competition, event, training course, etc., we need to collect your personal information so that we can honour your booking and to enable you to participate in the event.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to book your place.

Why we need your personal information – legitimate purposes

Members' personal data:

We also process our members' personal information in pursuit of our legitimate interests to:

- promote and encourage participation in swimming by sending members' communications and booking information for upcoming competitions and events. Our competitions and events may be filmed or photographed and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;
- provide competition in swimming by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
- monitor and develop participation in swimming by monitoring members' engagement and participation through sending email communications and inviting our members to participate in surveys for researching and development purposes;
- develop and maintain our members' qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed training and PVG / child protection requirements;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to swimming. We will use your personal information to investigate your complaint, to suspend membership, take disciplinary action, etc;
- provide a safe training and competing environment. We will use details you have provided regarding medical conditions, medication and medical consent in order to react appropriately to any incident while you are participating in an IASC-managed event.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us via email chair@invernessswimmingclub.co.uk. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member.

Volunteers' personal data:

We will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme.

If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the

above processing, please contact us via email chair@invernessswimmingclub.co.uk. If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to our members, and volunteers for the purposes of complying with our obligations under the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults.

Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

Who we share your personal information with

If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with local press and Facebook for promotional and/or journalistic purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

As an affiliated club of SASA we are required to ensure that all our members of IASC are members of SASA as a condition of affiliation. We will share your name and membership category with SASA who will become a controller of your personal information when they receive it. SASA's privacy notice explains how they use your personal information and can be accessed on their website here: www.scottishswimming.com.

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

Your membership records are stored and managed using a third party commercial membership system developed by membermojo. membermojo acts as a Data Processor for this data and all data stored in this system is stored within secure UK facilities. You have access to the data stored in this system and can login and view/amend any of your personal information whenever you wish.

How we protect your personal information

Your personal information is stored in hard copy files kept securely and in secure electronic filing systems, with our servers based in the EEA, and is accessed by our volunteers for the purposes set out above.

How long we keep your personal information

We will only keep your personal information for as long as necessary to provide you with membership services. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your membership with us for 1 year.

Your rights

You can exercise any of the following rights by writing to us by email chair@invernessswimmingclub.co.uk.

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a “subject access request”;
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Any requests received by IASC will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at www.ico.org.uk