



Club Privacy Notice

Website Privacy Policy

Stirling Swimming are committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people who register with the club either currently by direct email or via our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

When you join the club and register, you will be asked to give consent to this policy. If you wish to remove your consent, you can do so but this will result in (a) removal of your details in all club and squad communications and (b) removal of your web-based account (activation date August 2018).

We may change this Policy from time to time so please check either with your squad rep and the web site (activation date August 2018) to ensure that you're happy with any changes. Any questions regarding this Policy and our privacy practices should be sent by email to secretary@stirlingswimming.co.uk

What we need

Stirling Swimming as an affiliated Amateur Swimming Club of Scottish Swimming will be a "controller" of the personal information that you provide to us. This information will be disclosed to third parties, our National Governing body, Scottish Swimming and our club system management platform, Team Unify. The third party becomes the controller of the disclosed personal data.

When you register as a member of Stirling Swimming or renew your membership (including if you are registering or renewing on behalf of a child under the age of 16), we will ask you for the following personal information:

- contact details – e.g. name, address, email address, date of birth, etc.;
- membership criteria / category – for example, athlete, parent, etc.;
- payment details – bank account number, sort code, card details, etc.;
- participation details – for example, parent, athlete, committee, PBs etc.;
- equality information – for example, disability, etc.; and
- any other personal information, for example, PVG membership, etc.

In future, we will also collect information from our mailing lists e.g. who read our email, clicked on a link etc. This information will be removed after 12 months.

Why we need your personal information – contractual purposes

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

- provide you with core member services, including for example, insurance, licensing, voting, etc.;
- set up your online membership account;
- notify you by email of any or changes to training or updates to our forthcoming website;
- give you access to your times stored on our swimmers' times database;
- seek your views or comments on the services we provide;



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

We review our retention periods for personal information on a regular basis. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Why we need your personal information – legitimate purposes

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

- promote and encourage participation in the sport of 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 the sport of 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 the sport of swimming by monitoring members' engagement and participation through training and competitions and inviting our members to participate in surveys for researching and development purposes;
- invite our members as award winners or guests to our annual awards ceremony, which includes asking our members to nominate individuals for awards and shortlisting such individuals to select the winners, who we will then contact by email;
- 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 any mandatory 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 the sport of swimming. We will use your personal information to investigate your complaint, to suspend membership, take disciplinary action, etc. where appropriate.

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 on secretary@stirlingswimming.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.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to our members 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

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 Scottish Swimming we are required to ensure that all of our members are members of Scottish Swimming as a condition of affiliation. We will share your name and membership category with Scottish Swimming who will become a controller of your personal information when they receive it.

Scottish Swimming's' privacy notice explains how they use your personal information and can be accessed here <https://www.scottishswimming.com/privacy-policy.aspx>

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.

How we protect your personal information

Your personal information is stored on our electronic filing system and is accessed by specified committee members and coaches 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.

Your rights

You can exercise any of the following rights by writing to us at secretary@stirlingswimming.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 Stirling Swimming 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



COVID-19 Update:

As a result of the worldwide Coronavirus pandemic, we may need to record information regarding whether you are displaying from any symptoms of COVID-19, have been in recent contact with anyone who has tested positive or is displaying symptoms of COVID-19, have any underlying health conditions or have, or are in close contact with anyone who has, been advised to shield. This information would be required to ensure the safety of members attending Stirling Swimming.

Why we need your data

Our lawful basis for processing health information relating to COVID-19 is:

- to protect your vital interests; and/or
- for the legitimate interests of members attending Stirling Swimming to ensure individuals' safety and prevent the spread of the virus.

As health information falls within the definition of "special categories of personal data" under applicable data protection legislation, we also need a special condition to process such information. We may need to process this health information:

- to protect your vital interests where you cannot consent;
- for reasons of public interest in the area of public health, including protecting against serious cross-border threats to health where we have a legal duty of confidentiality to you; and/or
- with your explicit consent (if required).

Information we may collect about you

We may collect data from you in relation to COVID-19:

- From a return to water self declaration and/or a regular health check survey – detailing whether you have symptoms of COVID-19, if you have come into contact with someone with COVID-19, history of having COVID-19, and underlying health conditions.
- Should you report contracting COVID-19 through to the COVID Officer or Club Committee Member.

Who we share your personal data with

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with public health obligations. In the event that we do share personal information with third parties, we will only share such personal information as is 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.

Where a case of COVID-19 is recorded within the club, your personal information will not be shared with other members directly, however members will be advised that a case has occurred, whilst keeping personal information anonymous as far as possible.

How long will we store COVID-19 specific data?

We will only keep your personal information for as long as necessary in line with legal obligations – laws or regulation may set a minimum period for which we have to keep your personal information.