

## Data Privacy Policy

### Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by [the General Data Protection Regulation (the "GDPR")].

### Who are we?

City of Cambridge Swimming Club (CoCSC) is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

### How do we process your personal data?

CoCSC complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To administer membership records;
- To manage our members, employees and volunteers;
- To allow members to participate in organised Swimming competitions;
- To maintain our own Club accounts and ledgers;
- To fundraise and promote the interests of the club;
- To share your contact details with the Governing Bodies e.g. Swim England to maintain your membership;
- To operate the CoCSC web site and deliver the services that individuals have requested;
- To inform individuals of news, events, activities or services running at CoCSC;
- To contact individuals via surveys to conduct research about their opinions of current services or of potential new services that may be offered.

### Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with:

- Swim England (for membership information, results, rankings & records);
- British Swimming (for results, rankings & records);
- ASA East Region (for membership information, results, rankings & records);
- Other Swimming clubs (meet entries, results & records);

- Other bodies where required to do so by law or in connection with legal proceedings.
- We will only share your data with other third parties outside of the Club with your consent.

**How long do we keep your personal data?**

We keep your personal data for no longer than reasonably necessary e.g. for a period of 12 months after you leave in order to fulfil reporting requirements; in case of any legal claims/complaints; for safeguarding purposes.

**What information do we keep and why?**

Type of information	Purposes	Legal basis of processing
Member/parents name, address, telephone numbers, e-mail address(es), date of birth, age, gender	Managing membership of the Club	Performing the Clubs contract with the Member
	Entering Swim meets	For the purposes of our legitimate interests in operating the Club
	Communicating with members	
	Record Consents	
Emergency contact details	Contacting parent/next of kin in the event of emergency	Protecting the Members vital interests and those of their dependants
Medical information	Contacting parent/next of kin in the event of illness	Protecting the Members vital interests and those of their dependants
	Ensuring safety during activities	
Swimmers times	Entering Swim meets	Performing the Clubs contract with the Member
	Records and rankings	
Fees analysis	Recording fees due and paid	Performing the Clubs contract with the Member
Attendance registers	Recording attendance at training	Performing the Clubs contract with the Member

Type of information	Purposes	Legal basis of processing
Travel/event consent forms	Health and safety and Child Protection	Performing the Clubs contract with the Member
Administration of Medicines		
Grievances/Disciplinary/Child protection records	To investigate reports	For the purposes of our legitimate interests in operating the Club
Staff records	Managing the club	For the purposes of our legitimate interests in operating the Club

**Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

**Your rights and your personal data**

Unless subject to an exemption [under the GDPR], you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which CoCSC holds about you;
- The right to request that the CoCSC corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for CoCSC to retain such data;
- The right to withdraw your consent to the processing at any time; This may mean that you cannot participate fully in the activities of the club;
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable);
- The right to lodge a complaint with the Information Commissioners Office.

- Any requests are to be replied by the CoCSC to the requestor within 28 days of receipt of the request.
- CoCSC can refuse a request to remove information if a legitimate reason exists which follows the internal policy of data handling (please see CoCSC Data Handling Policy).

**Contact Details**

To exercise all relevant rights, queries or complaints, please in the first instance contact [admin@cocsc.org.uk](mailto:admin@cocsc.org.uk).