



Kingston Royals Swimming Club

Privacy Policy

This policy advises you how Kingston Royals Swimming Club (the “Club”) will handle and collect your personal information and data. If you are aged 16 or under, please obtain parental or guardian consent before providing any information to the Club.

1. What is personal information?

Personal information is information which can be used to identify an individual. This includes, but is not limited to:-

- first and last names;
- home address;
- e-mail address;
- date of birth;
- gender;
- contact telephone number(s);
- payment details or instructions;
- medical information/details of any allergies.

2. What personal information does the Club collect about or from you?

2.1 The legal basis upon which we collect and process your personal information will depend on the personal information and how it is collected, but we will only use your personal information where:-

- (a) we have your consent to do so;
- (b) we need to process your personal information for the legitimate interests of the Club, provided those legitimate interests are not overridden by your own data protection interests;
- (c) the personal information is required to perform a contract with you;
- (d) we have a legal obligation to collect personal information from you; or
- (e) we need the personal information to protect your vital interests or those of another person.

2.2 On joining the Club, you will have provided us with personal information as well as additional details when signing up for events organised by or through the Club, such as internal galas, open meets as well as open meets organised by other clubs or organisations (such as the County, Regional and National Championships).

2.3 Through the TeamUnify platform, the Club also collects and/or processes the following personal information about the Club's swimmers and their parents/guardians:-

- (a) swimmer's name, date of birth, gender, sportswear size and other measurements, physician name and contact details, medical information (if relevant and with parental consent), information about club membership and membership in sports bodies and associations, ability group, attendance history, competition results, medical insurance information, emergency contact, physician's name and contact details, videos, photos, any additional comments, notes or information submitted about a swimmer by someone authorised by the Club;
- (b) billing information and payment details, such as credit card and purchase history;
- (c) videos and photos;
- (d) the swimmers' meet results;
- (e) Swim England registration data for swimmers and the Club's coaches and volunteers; and
- (f) background and criminal record checks results for coaches and volunteers, with consent.

2.4 Please note TeamUnify will also collect information when you use their website and/or the OnDeck application. Details of TeamUnify's Privacy Policy can be found at the bottom of the Kingston Royals website homepage, but can also be found here:-

<https://www.teamunify.com/swim-team-management-software/privacy-policy/>

3. How does the Club use personal information regarding a swimmer, parent or legal guardian?

3.1 Under GDPR, you have the right to know how the Club use the information we hold about you and to whom it will be disclosed.

3.2 We may use the information held by the Club in the following ways:-

- (a) to assist in the management of all internal and external galas and open meets (which will necessarily involve us passing details of swimmers to those clubs or the names and e-mail addresses of any volunteers who are able to help);
- (b) to assist swimmers and their parents/guardians to register for open meets, sign up for jobs and access personal best times;
- (c) to assist the Club in practice management (including using video or photography to highlight stroke technique), event management, communication, billing, collection of fees and other services provided by the Club;
- (d) to keep you informed of any changes to the Club's kit supplier;
- (e) to monitor the Club's membership levels;
- (f) to monitor competition results;
- (g) to monitor attendance levels at the Club;
- (h) to record who has volunteered at events;
- (i) to keep an up-to-date list of qualified referees, judges and judges in training to ensure we have sufficient numbers of technical volunteers to run licensed Club-hosted events;
- (j) to ensure that squad fees are paid;
- (k) to ensure we recognise the achievements of our swimmers by keeping a record of those performances (e.g. personal bests, medallists, club records, Victor Ludorum or Jack Petchey winners);
- (l) to send messages via TeamUnify which are relevant club members, including details of all galas, open meets and social events, requests for volunteers and any other information we deem relevant for the smooth running of the Club; and
- (m) to comply with the registration and membership requirements of County, Regional and National sports bodies (e.g. Swim England).

4. Does the Club share your personal information with third parties?

- 4.1 The Club will not share personal information with third parties without your consent, except where:-
- (a) it is necessary to disclose such information to organisations such as Swim England or other swimming clubs (for example, to enable the Club to enter its swimmers into external open meets); or
 - (b) it is necessary to share such information with a service provider, such as TeamUnify or SportsEngine (TeamUnify's parent company), in order to provide members, their parents, and coaches with services they have requested as outlined in points 3.2(b) and 3.2(c) above; or
 - (c) where the Club has a legal obligation to disclose the information (such as responding to a court order), to protect the Club's legal rights or to prevent fraud.
- 4.2 We will take all reasonable steps to ensure that your data is secure and protected from unlawful and/or unauthorised access. Please note, however, that the transmission of information or data via the internet is not completely secure, so we cannot guarantee the security of your information when it is transferred from your device to the Club's website.
- 4.3 You should also ensure that the password which you use for logging into the Club's website and using the TeamUnify services is kept secure at all times and that you do not share it with anyone.

5. Transfer of data outside the European Economic Area (the "EEA")

- 5.1 TeamUnify is a third party service provider which is located in the USA., so the personal data or information you provide by signing into and using TeamUnify will be transferred outside the EEA.
- 5.2 As TeamUnify is outside the EEA, GDPR requires the inclusion of certain clauses in the contract with TeamUnify to ensure that your personal information remains secure. TeamUnify have included these clauses into their new subscription terms, which will take effect from 25 May 2018.
- 5.3 We will not transfer your personal data outside the EEA for any other reason.

6. How long will we keep information about you?

We will only hold information about you for as long as it is required for the purpose for which it was collected. Whilst you remain a member of the Club or use TeamUnify, we will retain and process information about you. If you leave the Club, we will delete all information about you within a reasonable period after you cease to be a member of the Club, subject to us retaining information to maintain club records and any legal obligations requiring the Club to retain the information.

7. Your rights

The new data protection laws grant you certain rights in relation to the information we hold, namely:-

- (a) **Right of access:** You have the right to obtain a copy of the personal data we hold about you.
- (b) **Right of rectification or erasure:** You have the right to require any personal data we hold about you to be rectified or corrected if it is inaccurate or incomplete.

- (c) **Right to portability:** You have the right to receive your personal data which you have provided to us in order to transfer it onto another data controller.
- (d) **Right to withdraw consent:** You can also ask us to delete data we hold about you if you can show that we no longer need it or if you withdraw your consent for us to process it. The Club will, however, be entitled to retain your personal data if it is under a legal obligation to do so.
- (e) **Right to object:** You have the right to object to us processing your personal data where the basis of the processing is our legitimate interests.
- (f) **Right to restrict processing:** You have the right to request that we stop processing your personal data where:-
 - (i) you dispute its accuracy or deem the processing unlawful and object to it being erased; or
 - (ii) we no longer need to retain your data, but you need us to do so to establish, exercise or defend any legal claims; or
 - (iii) we are in dispute about the legality of the way in which the Club has processed your personal data.
- (g) **Right to complain:** You have the right to lodge a complaint about the manner in which we process your personal data with the Information Commissioner's Office (also known as the ICO). Their contact details can be found on the ICO's website:-

www.ico.org.uk - <https://ico.org.uk/global/contact-us/>

8. Changes to our Privacy Policy

We will notify you of any changes which need to be made to this Privacy Policy.

9. How to contact us

If you have any questions about this Privacy Policy, please contact the Committee at:-

committee@kingstonroyals.co.uk