



Newham and UEL Swimming Club

Privacy Policy

Newham & UEL Swimming Club (NUEL) 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.

Children have the same rights as adults over their personal data. These includes the rights to access their personal data; request rectification; object to processing and have their personal data erased. We encourage the holders of parental responsibility for children to share this policy with your children if you feel that they are old enough to understand it.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so but our Executive Committee member has overall responsibility for data compliance for our club. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

1. About this policy

- We may collect, use and store your personal data, as described in this Privacy and Data Protection Policy and as described when we collect data from you.
- This policy applies to all our members, volunteers and general public that have dealing with the club.
- We reserve the right to amend this Privacy & Data Protection Policy from time to time without prior notice. 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 used your personal information.
- We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website of Information Commissioner (www.ico.gov.uk).

2. Personal Information we may collect from you

Depending on the type of membership you register with us, or the type of volunteer/employee role you apply for, you may provide us with or we may obtain personal information about you. NUEL collects and/or process your personal information through Team Unify platform such as:-



Newham and UEL Swimming Club

- Personal contact details that allows us to contact you directly such as name, email addresses and telephone numbers;
- Date of birth;
- Gender;
- Swim England membership number;
- Membership start and end date;
- Details of next of kin, family members, coaches and emergency contacts;
- References and other information included in the CV or cover letter or as part of the application process for membership
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- Records of your attendance at training sessions, at any events, competitions or workshops delivered by us or external activity providers;
- Records of assessment of swimmer (member) rankings, competition results and performance
- Images in video and/or photographic form and voice recordings;
- Any debit/card payments or other payment details you provide so that we can receive payments from you or you can receive payments from us and details of the financial transactions with you;
- Use of and movements through our online systems, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- Any disciplinary and grievance information;

3. 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 race or ethnicity;
- Information about your health, including any medical condition, health and sickness records, medical records and health professional information;

We may not collect all of the above types of special category personal information about you. In relation to special category personal data what we do process we do so on the basis that:

- The processing is necessary for reasons of substantial public interest, on a lawful basis;
- It is necessary for the establishment, exercise or defence of legal claims;



Newham and UEL Swimming Club

- It is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- Based on your explicit consent.

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 and Disclosure and Barring service information from you. For criminal records history we process it on the basis of legal and safeguarding obligations or based on your explicit consent.

4. Where we collect your information

We typically collect personal information when you create an account with us through our Team Unify platform, enter competitions, join a team, squad or training camp, register for learning and development opportunities, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

We may also collect personal information about you when you attend one of the events or workshops hosted by us or one of delivery partners and/or activity providers.

5. 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 account(s) you have with us and managing your relationship with you, including dealing with enquiries made by you	All contact details, records of your interactions with us. Use of and movements through our online portal.	This is necessary to enable us to properly manage and administer your membership with us.
Contacting next of kin in the event of emergency	Emergency contact details.	Protecting members vital interests and those of their dependants or next of kin.



Newham and UEL Swimming Club

<p>To send you marketing information we think you might find useful or which you have requested from us, including our newsletter and information about our events and activity providers to further progress your interest in the sport</p>	<p>Contact details and marketing preferences.</p>	<p>Where you have given us your explicit consent to do so.</p>
<p>To deal with your queries and complaints</p>	<p>Contact details and records of your interactions with us.</p>	<p>We have a legitimate interest to provide complaint handling services to you in case there are any issues with the service we provide.</p>
<p>Retention of records</p>	<p>All personal information we collect.</p>	<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>



Newham and UEL Swimming Club

<p>To conduct data analytical studies to better understand event attendance and trends</p>	<p>Records of your attendance at any events or competitions hosted by us and/or our delivery partners.</p>	<p>We have legitimate interest in doing so to ensure that our events continue to improve and are targeted and relevant.</p>
<p>To register you on to and keep tracks of any events you attend</p>	<p>Contact detail, details of events that you have attended, competition results and performance.</p>	<p>We need this information to manage our events and ensuring that they are targeted and relevant to you</p>
<p>For the purposes of promoting sport in the borough and community.</p>	<p>Images in video and/or photographic form.</p>	<p>Where you have given us your explicit consent to do so.</p>
<p>To comply with health and safety requirements</p>	<p>Records of attendance and health and medical information.</p>	<p>We have legal obligation and legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.</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 access your fitness to participate in any of the activities or events we host</p>	<p>Health 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>For the purposes of equal opportunities monitoring</p>	<p>Name, date of birth, gender, information about your race</p>	<p>We have legitimate interest to promote sports</p>



Newham and UEL Swimming Club

	ethnicity, and health information.	environment that is inclusive, fair and accessible. We process special category personal data on basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
To administer your attendance at any courses, events or programmes you sign to	All contact details, date of birth, gender, health and medical information, Swim England membership number, performance data, transaction and payment data.	This is necessary to enable us to register you on to and arrange for the effective delivery of our programmes and events. We process special category personal data on basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
To make payments to you where we have agreed to reimburse your legitimate expenses	Transaction and payment data	This is necessary to make payments to you.
To arrange and manage contracts for the provisions of services/products (for example monthly training fees, competition fees etc)	Transaction and payment data, contact details.	This is necessary to enable us to properly manage and perform any contract for services and products.
To comply with legal obligations, for example regarding people working with children and vulnerable adults	Information about your criminal convictions and offences and Disclosure and Barring information	For criminal records history we process if on the basis of legal obligations or based on your explicit consent.



Newham and UEL Swimming Club

- If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts, they have the right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy policy notice with those whom you feel are sufficiently mature to understand it. They also have the same rights as set out below.
- For some of your personal information you will have legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member of our club or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your position as a member of our club. For other personal information you may not be under an obligation to provide to us, but if you do not provide it then we may not be able to properly perform our contract if you.
- Where you have given us your consent to use your personal information in particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us.

Please note however that the withdrawal of your consent will not affect any use of 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 benefits to you.

6. Disclosure of your personal information

We share personal information with the following parties:

- Any parties approved by you;
- To any governing bodies (national, regional and local) for the sports covered by us: to allow them to properly administer the sport
- Our service provider (our current service provider is Team Unify/Sports Engine)
- External funding providers to meet the conditions of the application process and any funding agreement;
- Our partners and activity providers for the purposes of arranging any events or workshops you have registered your interest in;
- The Government or our regulators; we are required to do so by law or to assist with their investigations or initiatives; and
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and protection of national security.



Newham and UEL Swimming Club

We do not disclose personal information to anyone else except as set out above.

7. How long we keep personal information for?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected from you. However, in some cases personal information may be retained on a long term basis: for example personal information that we need to retain for legal purposes. Generally, where there is no legal requirement we retain all physical and electronic records for a period of not more than 12 months after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to personal injury claims, discrimination claims may be retained until the limitation period has expired.
- Information that be relevant to projects that we fund/participate may be retained for longer periods in order to allow us to access the longer-term impact of our sport for sports projects; and
- Historic, sequential competition results and records.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes by updating your information in Team Unify.

8. Links

Our site may contain links to other sites. Please be aware that we are not responsible for the privacy practices of these sites. We encourage our users to be aware when they leave our site to read the privacy statement in those sites. This Privacy and Data Protection Policy does not apply to information collected on third party sites.

9. How we protect your personal data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to the club workforce/volunteers, committee members and other third parties who have a legitimate need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



10. 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 other service provider; and
- The right to object to certain automated decision-making processes using your personal information.

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.

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.

11. 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 the 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 the way we use your personal information.



Newham and UEL Swimming Club

12. Contacting us

In an event of any query or complaint in connection with the information we hold about you, please email nuelscchairman@gmail.com.