



Norwich Swan Swimming Club

Privacy Notice for our Members

We 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 and what your rights are.

The Data Protection Act 2018 controls how your personal information is used by organisations and is the UK's implementation of the EU's General Data Protection Regulations (GDPR). Everyone responsible for using personal data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly, lawfully and transparently.
- used for specified, explicit and legitimate purposes.
- used in a way that is adequate, relevant and limited to only what is necessary.
- accurate and, where necessary, kept up to date.
- kept for no longer than is necessary.
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage.

References to **we**, **our** or **us** in this privacy notice are to Norwich Swan Swimming Club.

This notice applies to athletes, parents/guardians, coaches and volunteers if you have registered to become, or are, a member of our club.

For the purpose of the Data Protection Act 2018, the Data Controller of any of your personal information is Norwich Swan Swimming Club.

We are not required to appoint a Data Protection Officer.

Personal Information we may collect from you

When completing our membership form, we collect and hold the following personal information relating to the swimming member and/or the parent/guardian:

- personal contact details that allows us to contact you directly such as name, title, address, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end dates;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- records of attendance at any events/training hosted by us;
- images in video and/or photographic form with your consent;

- details of Swim England membership number;
- details of emergency contacts;
- records of competition/swim gala & meets including results & attendance;
- comments, notes or information about an Athlete submitted by any end user;
- any disciplinary and grievance information
- records of your interactions with us such as telephone conversations, emails and other relevant correspondence or instructions to us;
- marketing/email preferences so we know whether and how to contact you.

For some of your personal information you will have a 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 or we may not be able to properly perform our contract with you or comply with legal obligations.

There may be other personal information that you are not obliged to provide to us, but if you do not provide it then we may not be able to properly perform our contract with you.

You can withdraw your consent and request erasure of your data at any time prior to the completion of your membership application which you may do by contacting us as described at the end of this document.

Where you have given us your consent to use your personal information in a 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 the 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 member benefits to you.

Special Categories of Personal Information

We may also collect, with your consent, store and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your health, including any medical information, disabilities, doctor's information, allergies and dietary requirements, social requirements.
- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.

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

- It enables us to provide the best care for our members in training, competition and social events;
- 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;
- 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.

For staff/volunteers we may also collect criminal records information from/about you, this will be completed by the use of the Disclosure Barring Service.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

Where we collect your information

We typically collect personal information about our members, when you apply to become a member of the club and complete a paper membership form and are registered with an account with us at norwichswansc.co.uk via the TeamUnify secure access portal, when you take part in a competition controlled either by us or by another organisation, when you work as a volunteer for us, or when you purchase products and services from us, when you make a query and/or complaint or when you correspond with us by e-mail or in some other way.

In becoming a registered athlete, coach, official or volunteer, you will provide certain information to third parties including Swim England, Swim England East Region, Institute of Swimming, and British Swimming. This information may be shared with us.

If you are providing us with details of, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the "**Your rights in relation to personal information**" section below

Uses made of this Information

The main purposes for which we process your personal information is:

- to administer the membership you have with us and manage our relationship with you, including dealing with payments and any support;
- to send you information including details about competitions, events, training, social events newsletters, club news & updates;
- to answer your queries or complaints;
- for retention of records
- for the purposes of promoting the club including publishing race and competition results;
- administer attendance at training and competitions;
- to comply with our safeguarding requirements;
- to ensure your health and safety and for the safe running of club events, competitions, meets and training including sharing medical information with Team Managers at these events.
- for the purposes of equal opportunities monitoring.
- for contractual employment requirements for paid members.

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

- Specific consent - where you have provided specific consent to us using your personal information in a certain way, such as to send you email or texts.
- Legitimate Interest - to send information on activities and events which have been arranged as part of membership.

- Performance of a contract - to allow us to provide member services associated with the day to day running of the club and its activities such as requests for payments, registers, and fees.
- Legal obligation - to fulfil legal obligations for health and safety, insurance and child protection purposes.

Direct marketing

Email, post and SMS marketing: from time to time, we may need to contact you by email, post or SMS with information about our products and services we believe you may be interested in. We will only send marketing messages to you in accordance with the marketing preferences you set. You can let us know at any time that you do not wish to receive marketing message by contacting us as below.

We do not pass on your personal information to third parties for the purposes of direct marketing.

Disclosure of your Personal Information

We share personal information with the following parties:

- **Any party approved by you.**
- **To any governing bodies or regional bodies for the sports covered by our club:** to allow them to: properly administer the sports on a local, regional and national level.
- **Other swim clubs:** to enable competing at competitions, meets, galas.
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

In addition to this, any event which you enter into may process and hold personal data which is required in order for you to participate.

This policy does not cover how your data is processed in relation to external bodies.

Transferring your personal Information Internationally

European privacy law restricts the transfer of personal information outside of Europe without an appropriate data transfer mechanism (e.g., Standard Contractual Clauses, Privacy Shield for US companies, consent, Binding Corporate Rules). As TeamUnify's parent, SportsEngine, Inc, is based in the United States, to help us comply with European cross-border data transfer rules, TeamUnify have incorporated the European Commission's Standard Contractual Clauses for processors into their updated subscription agreement. TeamUnify may also at times engage non-European vendors to help deliver services requested from them (e.g., to relay emails). Where this is the case, they shall adopt an appropriate data transfer mechanism to ensure that the personal data with which our club customers entrust us remains protected irrespective of location. To further demonstrate their commitment to privacy, they have transitioned all European Clubs from their data storage facility in the United States to Amazon's Amazon Web Services data centre in Ireland.

How long do 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 it 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 will normally be retained in accordance with usual commercial practice and

regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 1 year after your last contact with us or the end of your membership. Exceptions to this rule are:

- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.
- We will continue to store individuals' performance data which form part of the club's competitive records.
- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months.

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, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you through our membership portal via www.norwichswansc.co.uk Alternatively, you can contact us by using the details set out in the **"Contacting us"** section below.

Our Website

Our website is set up to provide members and the public with the relevant information about Norwich Swan Swimming Club.

It includes details of recent achievements of our members and results and times of individual members from recent events. It does not contain any further personal data about the members. The website is not set up to allow transactions to be carried out through the website. It is available generally on the world wide web. Access to our swim team manager portal is via the website but is secure to members only.

Our site may, from time to time, contain links to and from the websites of our partner networks, sponsors advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites

The club has the following social media pages: Facebook/Instagram page and Twitter. All members are free to join these pages. If you join one of the Social Media pages, please note that the provider of the social media platform(s) have their own privacy policies and that the club do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on the club social media pages.

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 another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

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 www.ico.org.uk

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

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.

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 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 use your personal information.

Contacting Us

In the event of any query or complaint in connection with the information we hold about you, please get in contact with the Norwich Swan Committee via this email membership@norwichswansc.co.uk