

Dorking 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, including guardians and volunteers. 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.

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

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

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain, collect, store, transfer and use **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers, home address;
- date of birth;
- gender;
- membership start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you or make payments to you and details of the financial transactions with you;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events hosted by us; images in video and/or photographic form (with parental consent if under 18) and voice recordings;
- your marketing preferences so that we know whether and how we should contact you;
- your Swim England membership details and registration data (including ethnicity, county of representation if applicable);
- contact details of next of kin, family members or legal guardians, coaches and emergency contacts;
- records and assessment of any swimmer rankings, grading or ratings, competition results, details regarding galas attended and associated information for gala entries and performance;
- any disciplinary and grievance information;
- identification documents such as passport and identity cards
- any personal information required to carry out a Disclosure and Barring Service (DBS) background and criminal workforce check with consent if required for your role
- any personal information required to book an agreed specific course for you to attend
- contact information and records of your qualifications relating to volunteering or teaching/coaching
- references and other information included in a CV or cover letter or as part of an application for a role at the club
- any additional comments, notes or information about a member which are relevant to providing the services
- GP contact details

2. 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 health, including any relevant medical condition, health and sickness records, medical records and health professional information;
- We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent

In relation to the special category of personal data that we do process we do so on the basis that

- it enables us to provide the best care for the athlete in training or competition and it is therefore necessary to fulfil our contract with you
- it is necessary for the establishment, exercise or defence of legal claims;
- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for your role
- 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”.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information in the following ways:

- Joining forms completed when you apply to join the club or register an account with us through our Membership Secretary or our online systems
- Swim England membership applications
- Updates made by you or authorised members via the TeamUnify platform or other online systems.
- When you purchase any services or products we offer.
- When you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.
- Swim England Ranking Database of competition results or competition results received from other clubs
- We may also collect third party references you provide as part of the application process for membership
- Information provided by coaches or volunteers in relation to provision of services to you

If you are providing us with details of referees, next of kin, beneficiaries, 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.

4. 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 you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you and to comply with national and regional sports bodies’ registration and membership requirements	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
To arrange and manage any contracts for the provision of any services or products	Contact details, transaction and payment information.	This is necessary to enable us to properly administer and perform any contract for the

	Records of your interactions with us.	provision of any services and products you have purchased from us.
To send you information which is included within your membership benefits package, including details about training, competitions and events, partner offers and discounts, courses, our club newsletters, information about membership and any updates on Swim England and its activities	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other marketing information we think you might find useful or which you have requested from us, including , products and information about our commercial partners	Contact details and marketing preferences.	Where you have given us your explicit consent to do so.
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect.	<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>
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your attendance at any training, events or competitions hosted by us or which we submit entries to on your behalf.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant and we have suitable resources to provide the required services.

For the purposes of maintaining our website, promoting the club, our events and membership packages, volunteer opportunities. To produce and maintain our website and any external marketing campaigns in order to promote volunteer opportunities and to recognise the value created by our volunteers across the sports network	<p>Images in video and/or photographic form.</p> <p>Contact details of key roles at the club</p>	<p>We have a legitimate interest in supporting and growing the club and providing information to members and potential members.</p> <p>For images of children, consent will be given via membership forms or specifically requested.</p>
To comply with health and safety requirements	<p>Records of attendance, medical information about your health, accident logs</p>	<p>We have a legal obligation and a 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>
To provide coaching / teaching advice to you individually	<p>Images in video and voice recordings typically provided via Team Unify</p>	<p>This is necessary to enable us to provide you with greater understanding of technique. This consent will be requested on our membership forms.</p>
To administer your attendance at any courses or programmes or competitions or events you sign up to	<p>All contact and membership details, transaction and payment data.</p> <p>Details of any Swim England, county membership and performance data.</p>	<p>This is necessary to enable us to register you on to and properly manage and administer your attendance on the course, programme competition or event you sign up to.</p>
To arrange for any trip or transportation to and from an event or competition	<p>Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.</p>	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event or competition</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>
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to	<p>Health and medical information</p>	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.</p>

provide appropriate adjustments to our sports facilities.		<p>Necessary to perform the contract we have entered into with you.</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>
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
For the purposes of equal opportunities monitoring and to support diversity, equity and inclusion in the club	Name, title, date of birth gender, information about your race or ethnicity and health and medical information	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</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>
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information and identification documents, Name, date of birth, information about your criminal convictions and offences; Information about relevant courses you have attended	<p>To obtain DBS certificates and maintain records of relevant courses attended to conform with Welfare and Safeguarding requirements.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
To run a volunteer contact list	Telephone and e mail information; history of volunteering; membership information where relevant	To be able to contact you to request volunteer time to assist with the running of a specific event.
To assess your performance as a volunteer	Performance including any feedback provided to us by yourself, members of staff or other third parties.	We have a legitimate interest to ensure your suitability for any future volunteering roles and to ensure that your volunteering experience with us is positive and worthwhile.
Paying you for any out of pocket expenses	Transaction and payment information.	We need this information to make any out-of-pocket expense payments to 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 and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

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 as described in the "Contacting us" section below.

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.

5. **DIRECT MARKETING**

Email, post and SMS marketing: We do not email, post or SMS information about products and services we believe you may be interested in, that are not reasonably provided for as part of your membership benefits. We would ask for specific consent if we wanted to begin communicating with you for this purpose.

6. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We may have to share your data with third parties. We require third parties to respect the security of your data and to treat it in accordance with the law. We share personal information with the following parties:

- **Any party approved by you.**
- **Any governing bodies or regional bodies for the sports covered by our club:** to allow them to properly administer the sports on a local, county, regional and national level.
- **Where it is necessary to share with a service provider such as TeamUnify, Sports Engine (TeamUnify's parent company) who host the site we use to manage your membership, Meet Mobile, Meet Manager for meet management and other IT software and systems providers or external advisors.** [check]
- **Any clubs/organisations hosting competitions or events that you have registered for via Team Unify or other means that we will enter on your behalf.**
- **The Government, public bodies 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, and to protect the club's legal rights.

7. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

Some of our third-party suppliers may transfer or process your personal data outside of the UK and/or the EEA. In these cases, we look for suppliers who treat your data in a way that is consistent with and which respects the EU and UK laws on data protection.

8. **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 6 years after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months;
- 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.

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 TeamUnify or Swim

England, or via our Membership Secretary. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

9. 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 <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 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.

10. 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.

11. CONTACTING US

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

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