



## Data Protection - Privacy Policy

### Introduction

The Data Protection Act 1998 (DPA) was introduced to establish a framework for the protection of personal or sensitive data and is underpinned by a set of eight principles. This has now been updated by the GDPR coming into force on 25<sup>th</sup> May 2018.

By processing data in accordance with the data protection principles, Shiverers Swimming Club (SSC) will ensure the safeguarding of data for all our members.

The following is a broad description of the way Shiverers Swimming Club processes personal information.

### Policy aim and purpose

This policy has been designed to draw attention to the different types of personal or sensitive data which may be processed by SSC. In addition, the data processing methods (including the concepts of obtaining, recording, retrieval, consultation, holding, disclosing and using) utilised by SSC, for the purpose of fulfilling its role of an amateur swimming club, are outlined within this policy.

### Definition of data

Data refers to information about an individual (referred to as the 'data subject') that may be used or processed by SSC (referred to as the 'data controller') in order to carry out club administration, communication and management.

There are two categories:

- **Personal data**  
This is information which relates to a data subject who is able to be identified from those data or from those data with other information, which is already in possession, or likely to come into possession of, the data controller. Facts and opinions about the data subject which can be held electronically or on paper may also be considered as personal data.
- **Sensitive personal data**  
This is information about a data subject relating to racial or ethnic origin, physical or mental health or condition, and possibly in the case of paid staff or volunteers, the commission or alleged commission of any offence, criminal proceedings or convictions.

### The eight principles of the Data Protection Act (DPA) are:

1. Fair and lawful processing of personal data.
2. Processed for specified, lawful and compatible purposes.
3. Adequate, relevant and not excessive.
4. Accurate and up to date.
5. Not kept for longer than necessary.
6. Processed in accordance with the rights of the individual.

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7. Processed with appropriate security.
8. Not transferred outside the European Economic Area without adequate protection.

The above DPA principles are contained in the GDPR as follows:

1. Lawfulness, fairness **and transparency**.
2. Purpose limitation – data collected for a specific, explicit and legitimate purposes and not further processed in an incompatible way.
3. Data minimisation – adequate, relevant and limited to what is necessary.
4. Accuracy – where necessary kept up to date.
5. Storage limitation – kept in a form which permits identification for no longer than is necessary.
7. Integrity and confidentiality – the new security principle specifies protection against unauthorised or unlawful processing and against accident loss, destruction or damage using appropriate technical or organisational measures.

There is also a new **Accountability** principle which means that a Controller is responsible for and should be able to demonstrate compliance with all of the principles. Keeping records of compliance will be important.

Transparency is a new principle and organisations will need to provide more detailed information to a data subject when they first collect their personal data. For example, how it will be used and stored as well as setting out their data subject rights (see below).

Two existing DPA principles are contained separately in the GDPR as follows:

6. The rights of data subjects - these rights are dealt with as a section of their own
8. Overseas transfer of data - transfers are covered under obligations as controllers.

## **Complying with the data protection principles**

To meet the legal obligations of GDPR, SSC has in place the following procedures to ensure the security of data for all individuals engaged with the administration of the club:

- All members of Shiverers staff and volunteers have access to a copy of this policy
- All forms which require the collection of sensitive or personal data will include a data protection statement to inform you of how your data will be processed
- No data will be used for the purposes of marketing, unless we have obtained your written consent to confirm that this is acceptable.

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- No personal data will be disclosed, written or verbal, to anybody outside of SSC or Swim England, unless we have obtained your written consent the data subject is provided to confirm that this is acceptable
- Only nominated members and volunteers of SSC have access to personal data and process this information in accordance with this policy
- All records are electronically stored (using Teamunify), with appropriate protection in place to prevent unauthorised access from non-SSC members of staff/volunteers. Please click [here](#) for Teamunify's privacy policy
- Access to the TU membership database is restricted with password protection and access rights, made available to nominated members of the committee and coaching Team.
- Membership data is not used for any other purpose other than those permitted in this policy, including marketing or financial gain
- All records are kept accurate and up to date as far as practicable; SSC relies on members to make any changes to personal data as and when applicable through their personal Teamunify account.
- Should SSC at any point send an email to multiple individuals, those individuals will be blind copied into the correspondence.

## **How we use your information**

Personal data collected will solely serve the purpose of enabling SSC to carry out the requested activity. By submitting information to us, you are authorising SSC to process your data accordingly.

Should contact information be provided, you consent to receiving information relating to the requested activity by email, post or telephone unless stated otherwise.

We sometimes need to share the personal information we process with the individual concerned and also with other organisations, for example Swim England. Where this is necessary we are required to comply with all aspects of GDPR.

## **What type of information is collected from you?**

The personal information we collect might include your name, date of birth, home address, email address, phone numbers, guardian contacts, squad/group, medical information, etc.

## **Security of data**

SSC has in place appropriate measures to ensure the safety of stored data to prevent unauthorised use or disclosure. In the event of a breach of security (i.e. theft, deliberate attack on systems, unauthorised use of personal data by a member of staff, accidental loss or equipment failure), a recovery plan will be implemented. This will include procedures for assessing the risk associated with the breach, reviewing and updating security measures and notifying those individuals affected.

## **Who has access to your information?**

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

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## Right to be forgotten

If you leave the club and wish to have your details removed from our website then you can do so by sending an email from your registered email address to [shiverersmembership@gmail.com](mailto:shiverersmembership@gmail.com). SSC will delete your account information, it

will not remove any Comments, Forum posts or other interactions with this website.

If you do not request deletion of your account after leaving, it will be removed when it is deemed to no longer be required.

## Accuracy of your information

The accuracy of your information is important to us. If you change your personal details then please update this on your Teamunify membership account to ensure the information we hold is correct.

You have the right to ask for a copy of the personal information SSC hold about you on our website.

## Complaints

If you wish to make a complaint about how your personal data is being processed by SSC you have the right to complain. Please put this in writing to Shiverers Club Secretary. [[Shiverers.secretary@gmail.com](mailto:Shiverers.secretary@gmail.com)]. If you do not get a response within 30 days you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, or, as the case may be, any other competent supervisory authority of an EU member state.

## Use of 'cookies'

Like many other websites, the Teamunify SSC website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual.

## Main contact details

Shiverers Swimming Club.  
King Alfred Leisure Centre  
Kingsway  
Hove  
BN3 2WW

[swim@shiverers.co.uk](mailto:swim@shiverers.co.uk)

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SwimMark  
ESSENTIAL CLUB

SwimMark  
NETWORK MEMBER

clubmark

Swim England  
Affiliated Club

## **Monitoring and review**

This policy and its procedures will be reviewed annually, to ensure that it remains fit for purpose and in line with the requirements of the GDPR in force as of 25<sup>th</sup> May 2018.

The next policy review will take place in June 2019.