

# **Dunfermline Amateur Swimming Club Privacy Notice**

## **What we need**

Privacy Notice for Dunfermline Amateur Swimming Club, which is affiliated with the Scottish Amateur Swimming Association (SASA).

Dunfermline Amateur Swimming Club will be a “controller” of the personal information that you provide to us either in writing, or via online methods (for example SASA’s online membership system, known as Azolve) unless otherwise stated.

When you register as a member of Dunfermline Amateur Swimming Club or renew your membership (including if you are registering or renewing on behalf of a child under the age of 16), we will ask you for the following personal information:

- contact details – name, address, email address (for children under 16 this is the email address of the parent), and date of birth;
- membership criteria / category – swimmer, non-swimmer, volunteer;
- equality information – disability (if any); and
- any other personal information we may require on an occasional basis eg PVG membership.

## **Why we need your personal information – contractual purposes**

We need to collect our members’ personal information so that we can manage your membership. We will use our members’ personal information to:

- provide you with core member services, including insurance, licensing, and PVG checks;
- administer your SASA account online or set up your online SASA membership account if required;
- send you membership communications, by post, online or by email, in relation to essential membership services, including but not limited to, membership renewals and membership fees’.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above membership services.

## **Why we need your personal information – legitimate purposes**

Members’ personal data:

We also process our members’ personal information in pursuit of our legitimate interests to:

- promote and encourage participation in swimming by sending members’ communications and booking information for upcoming swimming galas and events. Competitions and events in which we participate may be photographed or filmed for training or live streaming purposes and the images captured from our competitions and events may also be used for promotional, education and development purposes;
- provide access to swimming galas by accepting and managing entries for those competitions and checking yours or your child’s personal information to ensure you are entered into the correct category;
- monitor and develop participation in swimming by monitoring members’ engagement and participation through attendance and inviting our members to participate in surveys for researching and development purposes;
- develop and maintain our members’ qualifications including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG/child protection requirements;

- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to swimming. We will use your personal information to investigate your complaint, suspend membership and take disciplinary action where appropriate; and
- run the SASA membership check which can be found online at <https://www.scottishswimming.com/membership/membership-check.aspx> to ensure that a member is eligible to compete or officiate at an event.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us at [membership@dasc-swim.co.uk](mailto:membership@dasc-swim.co.uk). If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member.

Volunteers' personal data:

We will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme.

If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us at [membership@dasc-swim.co.uk](mailto:membership@dasc-swim.co.uk). If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

### **Why we need your personal information – legal obligations**

We are under a legal obligation to process certain personal information relating to our members and volunteers for the purposes of complying with our obligations under:

- the Companies Act 2006 to maintain a register of our members, which includes our members' name, address, the date they were admitted to membership and the date on which they ceased to be our member, and hold general meetings, including issuing notices and voting arrangements;
- the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults;
- our Sport Scotland regulatory requirements to report on the size, achievement and profile of our members;
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary; and
- By virtue of affiliation of the Dunfermline Amateur Swimming Club to SASA, the club and its members acknowledge that they are subject to the laws, rules and constitutions of ASA East Scotland, British Swimming and FINA (the world governing body for the sport of swimming in all its disciplines).

### **Why we need your personal information – equality monitoring requirements**

We are required to use our members' personal information relating to a disability for equality monitoring purposes. SASA will process such personal information through aggregated and anonymised reports to

identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within our sport.

### **Other uses of your personal information**

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

### **Who we share your personal information with**

If your personal information is included in any images or videos taken by us at our swimming galas and events, we may share this with SASA, members of the Scottish media, sponsors, Sport Scotland and Sports Partners (including Scottish Leisure Trusts, Scottish Local Authorities, Swimming Clubs, Scottish Disability Sport, Scottish Universities) for promotional and/or journalistic purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

As an affiliated club of SASA we are required to ensure that all of our members are members of SASA as a condition of affiliation. We will share your name and membership number and category with SASA who will become a “controller” of your personal information when they receive it. SASA’s privacy notice explains how they use your personal information and can be accessed here [www.scottishswimming.com/membership/data-protection](http://www.scottishswimming.com/membership/data-protection)

In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

Scottish Swimming employs Azolve to administer our membership database, as part of which Azolve contracts third party payment providers to process our payments on their behalf. Azolve and its payment providers process our members’ personal information on our behalf as “processors” and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

For members who are attending UKCC courses run by Scottish Swimming, they use a platform called Onefile to administer the courses. The Onefile system holds basic personal details (name, email, date of birth) and processes learners’ personal information on our behalf as “processors” and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

Our volunteer uses Team Manager 8.0 for Swimming to record swimming gala entries and swim times. This holds first name, surname, date of birth, gender and SASA number for each swimmer and their times at all galas.

### **How we protect your personal information**

Your personal information is stored on SASA’s electronic filing system and their servers based in Europe, and is accessed by SASA staff and our volunteers for the purposes set out above.

Your personal information is stored on Microsoft Onedrive and their servers based in Europe and is accessed by our volunteers for the purposes set out above.

Your name and email address is stored on mailchimp and is accessed by our volunteers for the purposes set out above.

Members names may be mentioned in our Facebook closed group for the purposes set out above. This group is restricted to current members or the parent/guardian of current members under 16 yrs old.

Our Coaches will keep a hard copy of contact telephone numbers on Poolside in case of any emergencies arising during a session.

### **How long we keep your personal information**

We will only keep your personal information for as long as necessary to provide you with membership services. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your membership with us for six years.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of Dunfermline Amateur Swimming Club and for how long. We need to do this to comply with the Companies Act 2006, which requires us to keep a register of members in the event of a claim against Dunfermline Amateur Swimming Club.

### **Your rights**

You can exercise any of the following rights by writing to us at [membership@dasc-swim.co.uk](mailto:membership@dasc-swim.co.uk) or by logging on to Azolve at <https://scottishswimming.azolve.com/account.mvc/login>

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a “subject access request”;
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Any requests received by Dunfermline Amateur Swimming Club will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at [www.ico.org.uk](http://www.ico.org.uk).

FOR FURTHER INFORMATION PLEASE SPEAK TO A COMMITTEE MEMBER.