

## GDPR & Privacy Policy

### What is GDPR?

General Data Protection Regulation (GDPR) forms part of UK Law under the Data Protection Act of 2018 and is regulated by the Information Commissioners Office. GDPR gives increased rights and safeguards to individuals who has personal data collected by organisations. Boldmere Swimming and Water Polo Club recognise their responsibilities under these regulations and require all members to accurately and safely process and securely retain all personal data fairly and responsibly when this is made available to them.

### What is personal data, and what is collected?

Personal data is the information of its members which is collected by the Club and stored electronically and used to provide members with club information and manage their membership. The personal data collected by the club would contain the following as appropriate:

- Name
- Address
- Date of birth
- Telephone numbers and email addresses
- Emergency contact details
- Health and welfare information
- Financial transactions involving the club
- Disclosure and barring reports
- Training courses and qualifications
- Attendance at club events, meetings and training sessions
- Images at club events
- Performance information
- Notes, emails and social media interactions

### Why does the club collect this personal data, and how is it used?

Boldmere Swimming and Water Polo Club collect this data in order to manage the membership of the club. If the club does not have the required information then this will affect the ability of the club to offer some of it's membership services.

This personal data is used to:

- Fulfil legal obligations for insurance, commercial and health and safety purposes
- Enable contractual obligations with the running of the club such as sending payment requests.
- To comply with Swim England's "SwimMark" accreditation requirements

- To meet legal obligations which include the reporting and investigations under the Swim England Wavepower child safeguarding policy and procedures.
- To advise members of club activities and events through email, social media or telephone.
- To process applications and maintain club membership
- Process competition entries
- Process and publish performance data
- Publish images of club events online, in accordance with the Swim England Photography Policy
- To contact members in response to an enquiry
- Maintain the clubs internal records
- Monitor, sustain and develop club members qualifications

In agreeing to this GDPR and privacy policy, members consent to personal data being processed by Boldmere Swimming and Water Polo Club in the manner described above, and retained as per the clubs Data Retention Policy.

#### Who can see or process personal data held by the club?

Members of the club committee and sub-committees, Director of Swimming, Director of Water Polo, coaches, team managers and volunteers authorised by the committee may have access to personal data as their roles require. Performance data and images may be published on closed social media groups or through group emails, club website and notice boards.

Boldmere Swimming and Water Polo Club may need to share personal data with approved third parties in order to comply with legal and statutory obligations. As an affiliated club of Swim England personal data will be passed to Swim England, along with organisations such as Team Unity who provide administrative support to the club. The club requires all third parties to respect the security of personal data passed to them and treat it in accordance with the law. The club does not allow third parties to use the personal data of members for its own purposes, and will not disclose personal data without the consent of the member.

#### How long will the personal data be kept for?

Boldmere Swimming and Water Polo Club will process personal data for the duration of the membership of the individual, after which all data required to be kept for historical, legal, statutory or Swim England reasons will be processed as per the club Data Retention Policy.

#### What are the rights of a member?

All club members have a right to request access to the personal information held by making a “subject access request” to the Chairman of the club either in person, by email or post. The club will respond within 30 days, then provide a copy of the information held within a reasonable timeframe thereafter. If the member believes that any information held is inaccurate or incomplete, then the member has a right to request that this information is

amended accordingly. For further information regarding this, the member is advised to speak to a committee member for guidance.

Members have a right to request that the club restricts the processing of personal data for specific purposes and / or delete this information. This request could lead to the club being unable to provide some or all of its services to the member, and will be advised of the implications by the Chairman of the committee, however any requests received will be considered under applicable data protection legislation. If the member remains dissatisfied then they retain the right to raise a complaint with the Information Commissioners Office at [www.ico.org.uk](http://www.ico.org.uk).

## Sharing guide for Boldmere Swimming and Water Polo Club data holders

### When and how to share information

When asked to share information, you should consider the following questions to help you decide if, and when, to share. If the decision is taken to share, you should consider how best to effectively share the information. A flowchart follows the text.

#### When

Is there a clear and legitimate purpose for sharing information?

- Yes – see next question
- No – do not share

Do you have consent to share?

- Yes – you can share but should consider how
- No – see next question

Does the information enable an individual to be identified?

- Yes – see next question
- No – you can share but should consider how

Have you identified a lawful reason to share information without consent?

- Yes – you can share but should consider how
- No – do not share

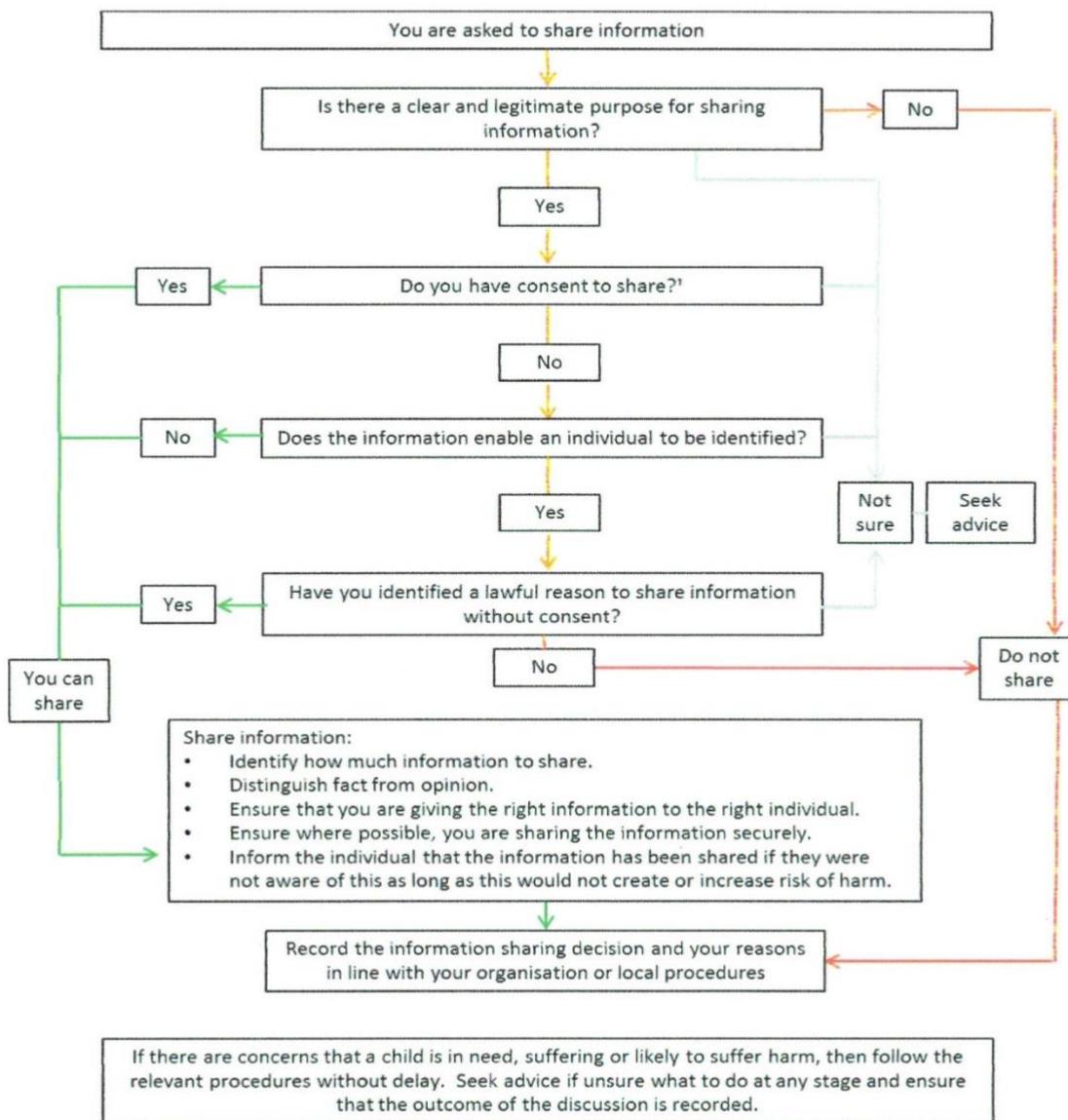
#### How

- Identify how much information to share
- Distinguish fact from opinion
- Ensure that you are giving the right information to the right individual
- Ensure where possible that you are sharing the information securely
- Where possible, be transparent with the individual, informing them that that the information has been shared, as long as doing so does not create or increase the risk of harm to the individual.

All information sharing decisions and reasons must be recorded in line with your organisation or local procedures. If at any stage you are unsure about how or when to

share information, you should seek advice on this. You should also ensure that the outcome of the discussion is recorded.

## Flowchart of when and how to share information



1. Consent must be unambiguous, freely given and may be withdrawn at any time

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