

## **HELENSBURGH AMATEUR SWIMMING CLUB**

### **Privacy Policy for Helensburgh Amateur Swimming Club**

Helensburgh Amateur Swimming Club takes your privacy seriously. We are a “controller” of the personal information that you provide to us and this privacy policy sets out how, why and for how long we will use your personal data, as well as who it is shared with. It also explains your legal rights as a data subject and how to exercise them.

#### **What we need from you**

When you register as a member of Helensburgh Amateur Swimming Club or renew your membership (including if you are registering or renewing on behalf of a young person aged 18 or under), or you become a volunteer with Helensburgh Amateur Swimming Club, we will ask you for some or all of the following personal information:

- Contact details – e.g. name, address, email address and phone number;
- Date of birth – to calculate eligibility for events;
- Membership or volunteer category – swimmer/parent/volunteer;
- Equality information – disability (if any) and gender identity; and
- Safety and emergency details – e.g. emergency contact information, relevant medical conditions.

If you do not provide us with all the personal information that we need this may affect our ability to offer you membership services and benefits or, in respect of volunteers, to allow you to volunteer.

#### **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 voting; and
- send you membership communications by post or email in relation to essential membership services, including but not limited to, general meeting notices, membership renewals and membership fees information.

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

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

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

- promote and encourage participation in the sport of swimming by sending members’ communications and booking information for upcoming competitions and events. Our competitions and events may be filmed or photographed and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;
- provide competition in the sport of swimming by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
- develop and maintain our coaches’ and other volunteers’ qualifications, including sending email communications to volunteers to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG / child protection requirements;

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- in respect of medical information of any kind (including mental or physical), facilitate communication with swimmers, tailor coaching styles, provide an understanding of swimmer behaviour in certain circumstances and to be able to react appropriately in the event of medical emergencies; and
- respond to and communicate with members/volunteers regarding your questions, comments, support needs or complaints, concerns or allegations in relation to the sport of swimming. We will use your personal information to investigate your complaint, suspend membership and take disciplinary action where appropriate.

In respect of volunteers, 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 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 on [HASC.Enquiries@outlook.com](mailto:HASC.Enquiries@outlook.com). 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 or volunteer.

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

We are under a legal obligation to process certain personal information relating to our coaches and other volunteers for the purposes of complying with our obligations under the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and other volunteers can undertake regulated work with children and vulnerable adults.

### **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**

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 Scottish Swimming we are required to ensure that all our members and volunteers are members of Scottish Swimming as a condition of affiliation. We will share your personal information with Scottish Swimming who will become a controller of your personal information when they receive it. Scottish Swimming's privacy notice explains how they use your personal information and can be accessed here:

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[https://www.scottishswimming.com/media/2964358/privacy-notice\\_members\\_february2019\\_final.pdf](https://www.scottishswimming.com/media/2964358/privacy-notice_members_february2019_final.pdf)

If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with Scottish Swimming for promotional and/or journalistic purposes.

We publish the results of competitions on our website and on our poolside noticeboard. This includes competitors' name, age and result.

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.

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

Your personal information is accessed by our President, Vice-President, Membership Secretary, Secretary, Treasurer, Head Coach, Coaches and others only for the purposes set out above. It is stored on web storage systems which have Privacy Shield certification, and in paper and electronic records maintained by the Membership Secretary. Electronic data is protected by password-controlled systems, and paper records are held securely away from the club premises.

### **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.

### **Your rights**

You can exercise any of the following rights by writing to us at [HASC.Enquiries@outlook.com](mailto:HASC.Enquiries@outlook.com).

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 Helensburgh 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).

## **Addendum to Privacy Policy for Helensburgh Amateur Swimming Club (August 2020)**

### **COVID-19**

As a result of the worldwide Coronavirus pandemic, we may need to record information regarding whether you are displaying any symptoms of COVID-19, have been in recent contact with anyone who has tested positive or is displaying symptoms of COVID-19, have any underlying health conditions or have, or are in close contact with anyone who has, been advised to shield. This information would be required to ensure the safety of members attending Helensburgh Amateur Swimming Club (HASC).

### **Why we need your data**

Our lawful basis for processing health information relating to COVID-19 is:

- to protect your vital interests; and/or
- for the legitimate interests of members attending HASC to ensure individuals' safety and prevent the spread of the virus.

As health information falls within the definition of "special categories of personal data" under applicable data protection legislation, we also need a special condition to process such information. We may need to process this health information:

- to protect your vital interests where you cannot consent;
- for reasons of public interest in the area of public health, including protecting against serious cross-border threats to health where we have a legal duty of confidentiality to you; and/or
- with your explicit consent (if required).

### **Information we may collect about you**

We may collect data from you in relation to COVID-19:

- From a return to water self-declaration and/or a regular health check survey – detailing whether you have symptoms of COVID-19, if you have come into contact with someone with COVID-19, history of having COVID-19, and underlying health conditions.
- Should you report contracting COVID-19 through to the Club COVID Officer or Club Committee Member.

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

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with public health obligations. In the event that we do share personal information with third parties, we will only share such personal information as is 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.

Where a case of COVID-19 is recorded within the Club, your personal information will not be shared with other members directly, however members will be advised that a case has occurred, whilst keeping personal information anonymous as far as possible.

### **How long will we store COVID-19 specific data?**

We will only keep your personal information for as long as necessary in line with legal obligations – laws or regulation may set a minimum period for which we have to keep your personal information.