

Barrow Amateur Swimming Club  
PRIVACY NOTICE

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 Parents/Guardians of minors/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. Data Protection Act 2018 is designed to give increased privacy rights and power to individuals whose data is being collected by organisations.

References to we, our or us in this privacy notice are to the Barrow Amateur Swimming Club

'We' are affiliated to The Amateur Swimming Association (Swim England) Limited and Cumbria Amateur Swimming Association and we are the data controller for the purposes of the Data Protection Act 2018. We are not required to appoint a Data Protection Officer.

## 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 personal information about you, such as information regarding your:

- Personal contact details that allows us to contact you directly such as name, title, address, email addresses and telephone numbers; 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;
- Financial transactions with you;
- Records of your attendance;
- Images in video and/or photographic form and voice recordings;
- Details of next of kin, family members, coaches and emergency contacts;
- Performance, attendance and event data;
- Qualifications, courses attended and certificates;
- Behaviour, disciplinary and grievance information;
- Disclosure and Barring Service reports.

We also collect the following sensitive information:

- Health & Medical Information;
- Para swimming classification;

Note: Under 16's

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

## 2. WHERE WE COLLECT YOUR INFORMATION

Information we collect include but not exclusively the following sources,

- Club Website – [www.barrowasc.co.uk](http://www.barrowasc.co.uk) – Contact Forms
- Social Media (Facebook / Facebook Messenger)
- Forms which you complete to join the club
- Forms which are completed to enter events and courses
- When you correspond with us by phone, e-mail or in some other way.
- This includes performance related information of events you have attended.
- Data Collection from British Rankings

## 3. WHY WE COLLECT THE INFORMATION

We collect the information to satisfy the following:

- Legitimate Interest - to send information on activities and events which have been arranged as part of membership.
- Contractual - to allow us to provide member services associated with the day to day running of the club and its activities such as requests for payments, admin charges, registers, and fees.
- Legal - to fulfil legal obligations for health and safety, insurance and child protection purposes.
- To provide the service you are registering and paying for.

## 4. How do we use your information

- Internal records – membership application;
- Internal record of member fees;
- Advise you of club events, activities and galas via text, email and phone;
- Process competition entries;
- Process performance data;
- Make decisions on team events based on gender, date of birth and performance;
- Process membership with Swim England and meet their accreditation requirements;
- Contact you in response to an enquiry;
- Contact you in case of emergency;
- Meet legal obligations such as reporting and investigations under Swim England safe guarding policy and procedures.
- Accreditation purposes for SwimMark and ClubMark
- To publish images of club events on club website and social media.
- Publish swimmer performance data including but not limited to entered events, venues, times, dates, name, age & squad on our website [www.barrowasc.co.uk](http://www.barrowasc.co.uk)
- Compare performance data to provide details on qualification for future events

- In connection with County or Regional Events / Teams we may pass your contact details to Cumbria ASA and/or Swim England North-West.
- In connection with any membership application you make your information will be passed to Swim England using their online membership system.

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 provide certain member benefits.

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 prior to consent been withdrawn. 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.

The following people may see your data:

- Head-Coach & Coaching Staff
- Committee Members
- Welfare Officers

The following external bodies will also hold some or all of your data.

- Swim England (Membership) <https://www.swimming.org>
- Swim England North-West (Membership & Regional Courses) - <https://swimnorthwest.org>
- Cumbria ASA (County Events) – <http://www.swimcumbria.org.uk>
- SportSystems (Performance Data) - <https://sportsys.co.uk/support/privacypolicy.pdf>
- Quickfile LTD (Accounting Software) - <https://community.quickfile.co.uk/t/privacy-policy/18934>
- The Rocket Science Group LCC (Mailchimp Email Marketing for member correspondence) - <https://mailchimp.com/legal/privacy/>
- Facebook - <https://www.facebook.com/policy.php>

In addition to this, any event which you enter into may process and hold personal data which is required in order for you to participate.

The policy does not cover how your data is processed in relation to external bodies, links to each external body is listed above.

## 5. 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 do not retain membership details beyond the duration 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.
- We will continue to store individual's performance data which form part of the club's competitive records

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 our website. Alternatively, you can contact us by using the details set out in the "Contacting us" section below.

## 6. 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.
- the right to request a copy of your personal data for you to reuse for your own purposes across different services.

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.

## **7. 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.

## **8. CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email the club secretary [secretary@barrowasc.co.uk](mailto:secretary@barrowasc.co.uk).

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