



# TROJAN SWIMMING CLUB WHITBURN & DISTRICT

## Privacy Notice

Trojan Amateur Swimming Club are committed to respecting your privacy. This notice is to explain how we may use the personal information we collect before, during and after your membership with us.

### **What we need**

Trojan Amateur Swimming Club (Trojan ASC) is a not for profit organisation run by a committee of volunteers and affiliated to Scottish Swimming.

Trojan ASC will be a “controller” of the personal information that you provide to us through forms which you may complete from time to time, records of correspondence, phone calls, details of attendance at club events, and via our website [www.trojanasc.com](http://www.trojanasc.com).

When you register as a member of Trojan ASC 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:

- personal contact details that allows us to contact you directly such as name, address, email address and telephone numbers;
- date of birth;
- gender;
- membership category – for example, swimmer, volunteer;
- participation details – for example, swimming, water polo etc.;
- country of international representation;
- health related details;
- equality information – for example, disability, etc. and
- emergency contact details – names and telephone numbers that we can use in case of emergency.

When you volunteer with Trojan ASC, we will ask you for the following personal information:

- contact details – name, address, email address and telephone numbers;
- date of birth;
- participation details – for example, volunteer, committee, etc.;
- equality information – for example, disability, etc.; and
- PVG membership details.

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

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 and benefits.



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### 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:

- communicate changes to scheduled training sessions;
- maintain attendance registers;
- contact parents/next of kin in the event of emergency or illness to protect the members' vital interests and those of their dependants
- promote and encourage participation in Aquatic Sports 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 Aquatic Sports by accepting and managing entries for competitions and checking your personal information to ensure you are entered into the correct category;
- 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 Aquatic Sports. Trojan ASC Constitution, Bye-laws and Regulations details the procedures on how we handle discipline, grievances and complaints, for example, we will use your personal information to investigate your complaint, to suspend membership, take disciplinary action, etc.;
- to arrange for any trip or transportation to and from an event;
- communicate club activities via a newsletter;
- invite our members as award winners or guests to our annual awards ceremony;
- invite our members to participate in surveys for researching and development purposes;
- invite our members to participate in fundraising events and sponsorship and
- promote the general interests of the club.

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 [secretary@trojanasc.com](mailto:secretary@trojanasc.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.

#### **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.

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on [secretary@trojanasc.com](mailto:secretary@trojanasc.com). If we 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, for the purposes of complying with our obligations under:

- 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 and
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

### **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**

Your personal data will be treated as strictly confidential, and will only be shared with:

- Scottish Swimming (for membership information, results, rankings and records)
- British Swimming (for results, rankings and records)
- Other Swimming Clubs (for meet entries, results and records)

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 and to assist with the investigation and prevention of crime, the protection of national security or in connection with legal proceedings.

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 of our members are members of Scottish Swimming as a condition of our affiliation. We will share the following information with Scottish Swimming for the purpose of membership registration:

- personal contact details such as name, address, email address and telephone numbers;
- gender;
- date of birth;
- membership category – for example, swimmer, volunteer;
- participation details – for example, swimming, water polo etc.;
- country of international representation and
- equality information – for example, disability, ethnicity, sexual orientation, religion or belief etc.

Scottish Swimming 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 via their website:

<https://www.scottishswimming.com/>

We will not disclose any personal information we collect about you to a third party without your consent.



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### How we protect your personal information

Your personal information is stored in both physical and electronic form, and is accessed by our volunteers for the purposes set out above. Trojan ASC is committed to respecting your privacy and complying with data protection laws by:

- keeping personal data up to date; by storing and destroying it securely;
- by not collecting or retaining excessive amounts of data;
- by protecting personal data from loss, misuse, unauthorised access and disclosure and
- by ensuring that appropriate technical measures are in place to protect personal data.

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.

### 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 one year.

We may also continue to store performance data which is part of the clubs competitive records.

### Your rights

You can exercise any of the following rights by writing to us at [secretary@trojanasc.com](mailto:secretary@trojanasc.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 Trojan ASC 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)



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### **COVID-19 Update:**

As a result of the worldwide Coronavirus pandemic, we may need to record information regarding whether you are displaying from 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 Trojan ASC.

### **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 Trojan ASC 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 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.