

Privacy Notice for Parents/Carers of U18 Team Luton Swimmers

We are committed to respecting your privacy. This notice explains how we may use personal data we collect before, during and after your child/ward's membership with us. As your child/ward is under 18 years of age, you are required to give consent where needed by us and provide us with your contact details so we may communicate with you on your child/ward's behalf on matters relating to their membership. This notice applies to you if you have registered your child/ward to become a member or they already are a member of the Club. This notice explains how we comply with the law on data protection and what your rights are. For the purposes of data protection we are the data controller in respect of the personal information we gather and process about you.

References to **the Club, we, our** or **us** in this privacy notice are to Team Luton Swimming Club. Marian Mason, Team Luton Chair, has overall responsibility for data protection compliance in the Club. Marian can be contacted via chair@teamluton.com.

1. **PERSONAL DATA WE MAY PROCESS ON YOU AND THE REASONS WE HAVE FOR PROCESSING IT**

You may initially provide us with, or we may thereafter create or obtain, **personal data** about you. We have audited the personal data processed by the Club and have used this to compile a data register of our processing activities; this is available to view by contacting Lindsay Wright via secretary@teamluton.com.

For ease of reference, we have produced a summary list below of the data we may hold on you, along with the reasons we have for processing such data:

- details that allow us to contact you in the capacity of your child/ward's representative about their membership with us and for us to process your child/ward's Swim England membership, which we do on their behalf;
- details that allow us to gain parental/carer consent when required;
- emergency contact information;
- records of your interactions with us such as emails and other correspondence and your instructions to us;
- details of financial transactions with you for appropriate record keeping and audit purposes;
- your email address to send you information relevant to child/ward's membership with us, eg competition entry details, award presentations, club fundraising events, club social events;
- details that allow us to contact you with requests for parental/carer assistance, for example in running competitions.

We have identified relevant legal bases for processing personal data. The legal bases we rely on are:

- performance of your child/ward's membership contract with us and their membership of Swim England;
- protection of our legitimate interests;
- your consent.

More details of how these legal bases apply to the different data we hold can be found in our data register.

2. WHERE WE COLLECT YOUR DATA

We typically collect your personal data when we receive your child/ward's application to become a member of the Club. Other personal data is generated and processed during the course of your child/ward's membership (see list above for examples of this).

3. WHAT HAPPENS IF YOU DON'T PROVIDE REQUESTED DATA TO US OR CHANGE YOUR MIND ABOUT THE DATA WE PROCESS ON YOU

For some of your personal data there is a requirement or obligation for you to provide us with the information. If you do not provide us with the requested personal data we may not be able to admit your child/ward as a member of the Club and may not be able to process their Swim England membership. Swim England membership is essential for insurance purposes if your child/ward is to train with the Club and is necessary for entry into competitions.

Where you have given us your consent to use your personal data in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting secretary@teamluton.com.

Even if you withdraw your consent, we may still be entitled to hold and process your personal data if we have other bases for doing so. Where processing is only based on consent, and you withdraw that consent in respect of future processing, this may mean that we are no longer able to provide certain member benefits to your child/ward or indeed continue their membership with us.

4. WHO YOUR PERSONAL DATA MAY BE SHARED WITH

We share certain personal data with the following external parties:

- Swim England, East Region Swimming, Bedfordshire ASA, to allow these organisations to properly administer the sport on a national level, regional and local level;
- Swim Club Manager, our cloud-based member management system, on which we store membership data, including your contact details, and through which we send email communications to members and their representatives;
- Active Luton in the event of a matter involving health and safety or security matters of the centre where disclosure of name is required or where Active Luton Membership is requested by you and verification details are required to secure the Club's discounted rate;
- Coaches and poolside helpers to contact you in the event of an emergency and/or in respect of coaching services provided to your child/ward and to discuss participation in competitions and other events;
- Committee members for governance and management of the Club.

We seek to limit the personal data we share with others and as such will not share more data than necessary.

5. TRANSFERRING YOUR PERSONAL DATA INTERNATIONALLY

We do not transfer your personal data to countries outside of the UK/the EEA.

6. HOW LONG WE KEEP PERSONAL DATA FOR

The duration for which we retain your personal data will differ depending on the type of data and the reason we collected it from you. We will usually remove your contact details from our membership management system within 1 month of the end of the membership year in which your membership terminates. Certain information must be retained on a longer-term basis in consideration of statutory obligations on us: for example, we will keep records of financial transactions for a period of 7 years. We

have identified appropriate retention periods for the data we process and these are contained in the Club's data register.

7. YOUR RIGHTS IN RELATION TO PERSONAL DATA

You have the following rights in relation to your personal data:

- to be informed about how your personal data is being used;
- to access the personal data we hold about you;
- to request the correction of inaccurate personal data we hold about you;
- to request the erasure of your personal data in certain limited circumstances;
- to restrict processing of your personal data where certain requirements are met;
- to object to the processing of your personal data;
- to request that we transfer elements of your data either to you or another service provider; and
- to object to certain automated decision-making processes using your personal data.

You should note that some of these rights may not apply to personal data processed by us, for example, we do not use automated decision making in relation to your personal data.

To exercise any of the above rights that do apply in respect of the data processed by us, please contact secretary@teamluton.com.

It is important to ensure that the personal data we hold about you is accurate and up-to-date. If there are any changes to the data you supplied to us upon joining, you should let us know of these as soon as possible via secretary@teamluton.com. We will check with you annually that such data remains accurate.

If you are unhappy with the way we are using your personal data you can complain to the UK Information Commissioner's Office. However, we are here to help and encourage you to contact us to resolve your complaint in the first instance via secretary@teamluton.com or chair@teamluton.com.

8. SWIM ENGLAND

In becoming a member of the Club, we process your child/ward's membership of Swim England on their behalf (if they are not already a member). Details of Swim England's data processing activity can be found on the Swim England website <http://www.swimming.org/swimengland/>.

9. THIS NOTICE

The legislation covering data protection is quite complex. We have tried to keep this document brief but nevertheless useful to you.

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.

More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk>.