Privacy Notice for 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 membership with us. This notice applies to you if you have registered to become or are a member of our 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:

   - contact details that allows us to contact you directly about your membership with us and for us to process your Swim England membership, which we do on your behalf;
   - date of birth to assist appropriate squad selection (non-adult swimmers) and for your Swim England membership;
   - gender for your Swim England membership and entry into competitions;
   - membership start and end date;
   - country of representation for your Swim England membership for competition in national and international events;
   - records of your interactions with us such as emails and other correspondence and your instructions to us;
   - details of financial transactions with you, or in relation to you, for appropriate record keeping and audit purposes;
   - records of your entry to and attendance at any competitions/events held by us or such entries to other competitions submitted by us on your behalf (upon your instruction and with your consent);
   - images in video for training purposes and development of your skills;
   - images in photographic form for publicity purposes for website and media and to accompany reports of swimming successes;
   - details of next of kin (adult swimmers) and parent/carer (non-adult swimmers) to fulfil our duty of care and to ensure appropriate guardian consent where needed;
   - records and assessments of skills and your development, swim times and competition results to track your progress, ensure the delivery of appropriate coaching services to you and to celebrate success;
   - safeguarding and welfare information to ensure appropriate handling of any issues;
   - your email address to send you information relevant to your membership with us, eg competition entry details, award presentations, club fundraising events, club social events;

- health and safety information, for example accident records and records of attendance at training, to fulfil legal requirements and our duty of care.

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

- performance of your membership contract with us and your membership of Swim England;
- compliance with a legal obligation on us;
- protection of our legitimate interests;
- protection of your vital 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. SPECIAL CATEGORIES OF PERSONAL DATA AND THE REASONS WE PROCESS THESE

We may process the following "**special categories**" of sensitive personal data:

- information about your health, including any medical condition and information relating to sports class classification (for disability swimmers).

We process the above special category personal data on the following legal bases:

- based on your explicit consent;
- in respect of your health, this will in part, be in order to protect your vital interests.

3. WHERE WE COLLECT YOUR DATA

We typically collect personal data about our swimmers when you apply to become a member of the Club. Other personal data is generated and processed during the course of your membership (see list on page 1 for examples of this).

If you are providing us with parental/carer details or details of next of kin, they have a right to know that we hold personal data on them and how we might use that information. We deal with this when you apply to join the Club.

4. 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 legal, contractual or other 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 you as a member of the Club and may not be able to process your Swim England membership. Swim England membership is essential for insurance purposes if you are to train with the Club and is necessary for entry into competitions. Additionally, if you do not provide us with the requested personal data, we may not be able to properly perform our contract with you or comply with our legal obligations and we may have to terminate your membership.

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 you or indeed continue your membership with us.

5. **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 and through which we send email communications to members;
- 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/or your immediate family members and verification details are required to secure the Club's discounted rate;
- Coaches and poolside helpers in order to deliver coaching services to you;
- Committee members for governance and management of the Club;
- Our clothing suppliers in the event you request personalised Team Luton kits for specific events;
- Emergency services in the event of a medical emergency or a potentially criminal matter.

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

6. **TRANSFERRING YOUR PERSONAL DATA INTERNATIONALLY**

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

7. **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 membership data 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.

8. **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.

9. SWIM ENGLAND

In becoming a member of the Club, we process your membership of Swim England on your behalf (if you 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/.

10. 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.