

# **Monifieth Swim Club Privacy Notice**

#### What we need

Monifieth Swim Club are a swimming club affiliated with Scottish Swimming.

Monifieth Swim Club will be a "controller" of the personal information that you provide to us unless otherwise stated.

When you register as a member of Monifieth Swim Club or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following personal information:

Members' Personal Data:

- Contact Details name, address, email address, telephone numbers;
- Date of Birth to calculate membership category and eligibility for events and courses;
- Membership Criteria / Category athlete, parent, volunteer, committee role
- Equality Information gender identity, disability details where applicable; and
- Other Personal Information PVG membership where applicable and qualifications where appropriate

### 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;
- set up your online membership account; and
- send you membership communications by post or email in relation to essential membership services, including but not limited to: membership renewals, and membership fees' information.

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.

When you book a place with us for and attend a coaching course, competition, event or a training course, we need to collect your personal information so that we can honour your booking and to enable you to participate in the course, competition or event.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to book your place.

Monifieth Swim Club August 2024

### 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:

- promote and encourage participation in 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 Swimming by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
- monitor and develop participation in Swimming by monitoring members' engagement and participation through register taking and inviting our members to participate in surveys for researching and development purposes;
- invite our members as award winners or guests to our annual awards ceremony;
- 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; and
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to Swimming. We will use your personal information to investigate your complaint, to suspend membership, take disciplinary action, etc. based on the Monifieth Swim Club disciplinary procedures.

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 our Data Protection Officer on <a href="mascdataprotectionofficer@gmail.com">mscdataprotectionofficer@gmail.com</a>. 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.

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 <a href="mailto:mscdataprotectionofficer@gmail.com">mscdataprotectionofficer@gmail.com</a>. 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 and volunteers 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

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 may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include but are not limited to 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.

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.

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 your name, contact information including email address and membership category 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 <a href="https://www.scottishswimming.com/privacy-policy.aspx">https://www.scottishswimming.com/privacy-policy.aspx</a>.

We may publish the results of our competitions on our website or social media channels. This may include competitors' name, age and results.

#### How we protect your personal information

Your personal information is stored on our electronic filing system based in the UK, and is accessed by our committee and volunteers for the legitimate purposes set out above.

We are occasionally required to transfer your personal information outwith the UK for the purposes of – for example, entering athletes into competitions, booking travel arrangements for training camps etc. Where your personal information is transferred outwith the UK, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

# 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 delete your personal information where you have not renewed your membership with us for three years.

We have a data retention policy that sets out the periods for retaining and reviewing all information that we hold. This sets out different retention periods and you can request a copy by contacting us at <a href="mailto:mscdataprotectionofficer@gmail.com">mscdataprotectionofficer@gmail.com</a>

# **Your rights**

You can exercise any of the following rights by writing to us at <a href="mailto:mscdataprotectionofficer@gmail.com">mscdataprotectionofficer@gmail.com</a>.

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 Monifieth Swim 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 <a href="https://www.ico.org.uk">www.ico.org.uk</a>