

## **Data Protection Document**

#### What we need

Dumfries Amateur Swim Club (Dumfries ASC) is a competitive swimming club, offering Age Group, Masters and Open Water Swimming. Dumfries ASC is affiliated to Scottish Swimming, and will be a "controller" of the personal information that you provide to us through either submission of membership forms or through our website (www.dumfriesasc.co.uk) unless otherwise stated.

#### Members' personal data:

When you register as a member of Dumfries 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:

- contact details name, address, email address, date of birth, etc.;
- membership criteria / category for example, athlete, parent, volunteer, etc.;
- payment details bank account number, sort code, card details, etc.;
- participation details for example, parent, athlete, etc.;
- equality information for example, disability, etc.;
- emergency contact details name, address and phone number; and
- medical forms (for swimmers only.

#### Volunteers' personal data:

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

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

#### Why we need your personal information – contractual purposes

#### Members' personal data:

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, voting, PVG checks;
- to set up your online membership account and administer your account online;
- send you membership communications by email in relation to essential membership services, including but not limited to, general meeting notices, membership renewals, membership fees and information related to the club, and other activities relating to your swimmer.

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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#### Participants' personal data:

When you book a place with us for and attend a coaching session, competition, event, training course, etc., we need to collect your personal information so that we can honour your booking and to enable you to participate in the course, competition, event, etc. If you do not provide us with all of the personal information that we need to collect then this make affect our ability to book your place.

#### 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 aquatic disciplines 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;
- 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 swimming. For example, we will use your personal information to investigate any complaint, to suspend membership, take disciplinary action, etc.

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 by email to <a href="mailto:secretary@dumfriesasc.co.uk">Secretary@dumfriesasc.co.uk</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 by email to <a href="mailto:secretary@dumfriesasc.co.uk">secretary@dumfriesasc.co.uk</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.

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## **Data Protection Document**

## Why we need your personal information - legal obligations

We are under a legal obligation to process certain personal information relating to our members, volunteers, participants, athletes, etc. 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;

## 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, SASA West District, local press, our Dumfries ASC website, social media and notice board 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 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.

Dumfries ASC employs third party suppliers to provide services, including transactional services, online billing, event entry and membership administration. These suppliers may process personal information on our behalf as "processors" and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

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.

### Scottish Swimming members' personal data

As an affiliated club of Scottish Swimming we are required to ensure that all of our members are also members of Scottish Swimming as a condition of our affiliation.

We will share names 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="www.scottishswimming.com/member-data-protection/">www.scottishswimming.com/member-data-protection/</a>

#### Athletes' / Participants' personal data

We publish the results of our competitions on our website. This will include competitors' name, age, result.

#### How we protect your personal information

Your personal information is stored on our electronic filing system and our servers based in the UK, and is accessed by our volunteers for the purposes set out above. This is also the case for any hard-copy paper files.

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## **Data Protection Document**

## How long we keep your personal information

## Members' personal data

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 six years.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of Dumfries ASC and for how long. We need to do this to in the event of any claim against Dumfries ASC.

### Athletes' personal data

We keep our athletes' personal information for six years, with the exception of Club Records which we will retain until such records are broken.

## Your rights

You can exercise any of the following rights by writing to us at <a href="mailto:secretary@dumfriesasc.co.uk">secretary@dumfriesasc.co.uk</a> or by logging on to your account at within the OnDeck Application.

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

## Why we need your personal information - marketing.

Where you are happy for us to do so, we would like to contact you by email or within the OnDeck App with information about swimming, our latest news and upcoming events / competitions / courses.

If you would like to receive email communications from us, please use the OnDeck App to select options within the Settings and Privacy section.

You may change your preferences at any time or request that we stop sending you email communications by contacting us at <a href="mailto:secretary@dumfriesasc.co.uk">secretary@dumfriesasc.co.uk</a> or logging in to your account at within the OnDeck App.

Dumfries ASC's third-party service provider is currently Team Unify (<a href="www.teamunify.com">www.teamunify.com</a> ), via the OnDeck App or SportsEngine website <a href="https://uk.gomotionapp.com/dumfriesasc">https://uk.gomotionapp.com/dumfriesasc</a>

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