



Sutton & Cheam Swimming Club is committed to respecting and protecting your privacy, and has produced this privacy notice to comply with the General Data Protection Regulations 2018 (GDPR),

This Privacy Notice explains why we collect personal information, how we use it, the conditions under which we may disclose it and how we keep it secure.

The Notice should be read in conjunction with the “Swim England Privacy Policy” – see <http://www.suttonandcheam.co.uk/safeguarding/SwimEnglandPrivacyNotice.pdf>

### **What is GDPR?**

Essentially, GDPR is a new set of rules which give more control and increased privacy rights to individuals whose personal data is being collected by organisations.

### **Who does GDPR apply to?**

GDPR applies to any organisation, including clubs operating within the EU.

### **What is personal data under the GDPR?**

Personal data is any data which could be processed to uniquely identify an individual. Obvious examples include name, address, date of birth etc., though GDPR extends the definition of personal data to include less obvious examples such as photographs and IP addresses.

### **The Data Protection Principles**

The GDPR includes several data protection principles that clubs need to be aware of whenever they are using personal data. In order to comply with these principles, clubs need to:

**Identify** a lawful basis to process the personal data (from the list set out in the GDPR), and provide a privacy notice\*\* to members, informing them how the club uses their personal data.

**Only collect**, use and keep personal data for specific purposes – i.e. only use a member’s personal data for membership purposes; The GDPR does not allow data to be collected for one purpose and used for another.

**Only collect**, use and keep personal data that clubs actually need; We can only hold sufficient information on an individual to do the job. We cannot hold more information than is necessary.

**Keep** personal data up-to-date where possible; We must take reasonable steps to ensure the information we hold is accurate and up to date for the purposes for which they are processed; and that inaccurate data are erased or rectified without delay

**Only keep** personal data for as long as the club needs it – i.e. when a member leaves a club, clubs should review all the member’s personal data held to see whether they still need it after a specific period of time (for example, three years); and

**Protect** personal data and keep it secure.

**Process** personal data in accordance with the rights of the individual – see “Your Rights” below

\*\* This Document

### **Why we collect and use personal data**

The Data Protection Principles require clubs to identify a legal basis for processing personal data under GDPR.



GDPR provides a specific list of “lawful bases” for processing personal data and clubs are required to identify those which apply before collecting and/or using personal data. Clubs must then explain this to individuals in a privacy notice (This document).

Thus, the principal reasons Sutton and Cheam Swimming Club processes peoples’ data are:

**Contractual** - to allow us to provide member services associated with the running of the club and its activities such as:

- Processing your membership with the club and with Swim England;
- Complying with Swim England’s SwimMark accreditation requirements;
- Collecting membership, training and meet fees;
- Processing competition entries and performance data;
- For our own internal records

**Legal** – to allow us to use personal data to comply with a legal obligation

- To fulfil legal obligations for health and safety and insurance;
- To meet legal obligations such as reporting and investigations under the ASA Wavepower Child safeguarding policy and procedures

**Legitimate Interest**

- To advise you of club events, activities, galas and open meets which have been arranged as part of membership of the club.

**Personal Data we hold about you.**

Sutton & Cheam Swimming Club collects personal data from members using membership forms completed on joining, records of correspondence such as emails and phone call; and details of attendance at club events.

**The data we collect:**

- Name
- Gender
- Date of birth
- Address
- Telephone number(s)
- Email address
- Emergency contact details
- Medical and health-related information \*
- Financial details
- Notes and emails
- Performance data
- Registers; attendance at training sessions and events.
- Qualifications, certificates and relevant course attendance details
- Disclosure and Barring Service (DBS) reports
- Photographs

\*Any special category health data we hold is only processed for the purpose of fitness/health checks to allow the safe running of training sessions.



## Who sees your data?

Dependent on roles within the club, the following people may see your data:

- Membership Secretary
- Chairperson and Committee Members
- Coaches
- Welfare Officer
- Coaching & Teaching Staff
- Team Managers
- Club Secretary
- Competition Secretary
- Treasurer
- SwimMark Co-ordinator.

Named performance data is also available on the club website, facebook and twitter pages, and club notice boards.

## Disclosure

Sutton & Cheam Swimming Club will not disclose any personal information we collect about you to a third party without your consent.

In connection with any membership application you make your information will be passed to Swim England using their ASA Online Membership system.

In connection with any request or enquiry you make, your information will be passed to the relevant club contact.

## Consent

In agreeing to this Privacy Notice, you are consenting to your personal data being processed by Sutton & Cheam Swimming Club in the manner described above.

If you do **NOT CONSENT** to your personal data being processed in line with Sutton & Cheam Swimming Club's GDPR Privacy Notice, your data will be deleted in line with your "Right to be Forgotten". However, if you do not choose to share your personal data with us, this could make it difficult for us to fulfil our contractual obligations to you and we may not be able to register or administer your membership of the club.

## Retention Policy

Sutton & Cheam Swimming Club will process personal data during the duration of your membership after which your data will be deleted. Sutton & Cheam Swimming Club will continue to store only the personal data needed to meet any legal or Swim England obligations, and will continue to store individuals' performance data which form part of the Club's competitive records.

## Your Rights

In relation to the personal data that Sutton & Cheam Swimming Club hold, you have the following rights:

**The Right of Access** – you have the right to request a copy of the information that Sutton & Cheam Swimming Club holds about you.

**The Right of Rectification** – you have a right to correct data that we hold about you which is incomplete or inaccurate.



**The Right of Erasure or The Right to be Forgotten.** You can ask for the data we hold about you to be deleted. Under these circumstances, we will continue to store only the personal data needed to meet any legal obligations, ensure the safeguarding of children, or to comply with Swim England requirements.

**The Right to Restriction of Processing** – where certain conditions apply, you have a right to restrict the processing of your personal data.

**The Right of Portability** – you have the right to have the data we hold about you to be transferred to another organisation.

**The Right to Object** – you have the right to object to certain types of processing e.g. direct marketing.

### **Access Requests**

To access personal data, identification will be required. Requests should be made to Sutton & Cheam Swimming Club by emailing [davidandrews359@icloud.com](mailto:davidandrews359@icloud.com)

Sutton & Cheam Swimming Club accepts the following forms of ID when information on your personal data is requested:

- A copy of your passport
- Driving licence
- Birth certificate
- Current utility bill not older than three months (registered address)
- A minimum of one piece of photographic ID listed above and a supporting document is required.

### **Complaints**

If you wish to make a complaint about how your personal data is being processed by Sutton & Cheam Swimming Club, you have the right to complain. Please put this in writing to Mr David Andrews, Chair, Sutton & Cheam Swimming Club [davidandrews359@icloud.com](mailto:davidandrews359@icloud.com)

If you do not get a response within 30 days, you have the right to complain to the Information Commissioner's Office (ICO).

ICO  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF

Telephone 0303 123 1113  
<https://ico.org.uk/global/contact-us/email/>