



## **CARN BREA AND HELSTON SWIMMING CLUB PRIVACY NOTICE FOR MEMBERS**

Carn Brea and Helston Swimming Club (CBHSC) are committed to respecting your privacy. This notice is to explain how we may use the personal information we collect before, during and after your membership with us. This notice applies to you if you have registered to become or are an existing 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 CBHSC is the Data Controller for any of your personal information.

References to **we**, **our** or **us** in this privacy notice means CBHSC.

### **1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

Depending on the type of membership you have with us, you may initially provide us with or we may obtain **personal information** about you as detailed below:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- records of your attendance at any events hosted by us;
- images in video and/or photographic form;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any swimming competition results, details regarding meets attended and performance, club championships results and rankings
- any welfare, disciplinary and grievance information;

### **2. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your health, including any medical condition and health professional information; and

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the following table we refer to these as the “special category reasons for processing of your personal data”.



### 3. WHERE WE COLLECT YOUR INFORMATION

We can collect personal information about our members when you apply to become a member of the club, when you make a query and/or complaint, when you enter a meet or correspond with us by phone, e-mail or in some other way.

If you are providing us with details of next of kin, family members and emergency contacts they have a right to know and to be aware of the personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

### 4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you information which is included within your membership benefits package, including details about meets and events, and any updates on swimming	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events and information from CCASA or South West Region	Contact details and marketing preferences.	Where you have given us your explicit consent to do so.
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our club

		<p>and in some cases we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<b>The security of our IT systems</b>	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
<b>To conduct data analytics studies to better understand event attendance and trends within the sport</b>	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
<b>For the purposes of promoting the club, our events and membership packages.</b>	Images in video and/or photographic form.	Where you have given us your explicit consent to do so on the membership form
<b>To comply with health and safety requirements</b>	Records of attendance, CCTV footage and other information obtained through electronic means medical information about your health	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above</p>
<b>To administer your attendance at any courses or programmes you sign up to</b>	<p>All contact and membership details, transaction and payment data.</p> <p>Details of any county membership and performance data.</p>	This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or programme.
<b>To arrange for any trip or transportation to and from an event</b>	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above</p>



<p><b>To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.</b></p>	<p>Health and medical information</p>	<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p><b>To gather evidence for possible grievance or disciplinary hearings</b></p>	<p>All the personal information we collect</p>	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p><b>For the purposes of equal opportunities monitoring</b></p>	<p>Name, title, date of birth gender, information about your race or ethnicity and health and medical information</p>	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p><b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b></p>	<p>Information about your criminal convictions and offences</p>	<p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>

Some personal information will be required because of a legal, contractual or other requirement/ obligation. Without this we may not be able to process your membership, perform our contract with you or comply with legal obligations. This could result in the termination of your membership. Other personal information you may not be under obligation to provide to us, but if you do not provide it then we may not be able to properly perform our contract with you.

If you have given us your consent to use your personal information, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section at the end of this policy.



**Please note** that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent. Withdrawing consent may have the same effect as not providing the information in the first place, for example we may not be able to allow you to compete in galas etc.

## 5. **DIRECT CONTACT**

**Email, post and SMS:** from time to time, we may contact you by email, post or SMS with information about club activities, news and competitions etc. Your details will never be passed to a third party for the purposes of marketing without your prior consent. We may, on occasion, have to disclose personal information which is detailed below.

## 6. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you, this includes Meet Promotors .**
- **Any governing bodies or regional bodies for the sports covered by our club:** to allow them to properly administer the sports on a local, regional and national level.
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

## 7. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect is not transferred to and stored in countries outside of the UK.

## 8. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 1 calendar year following the end of your membership. Exceptions to this rule are:

- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.
- Financial records

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

## 9. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

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

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;



- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website.

If you are unhappy with the way we are using your personal information can you please contact the club in the first instance so that we can try to resolve your concerns. If you are still not satisfied you can complain to the UK Information Commissioner's Office or your local Data Protection Regulator.

#### 10. **CHANGES TO THIS NOTICE**

If any changes are made to this privacy we will update the version date at the bottom of this page. For significant changes we will try to give you reasonable and if required by law we will seek your consent to any changes made to the way we use your personal information.

#### 11. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email the chairman on [chairman@cbhsc.co.uk](mailto:chairman@cbhsc.co.uk)

**Version 1 11<sup>th</sup> February 2019**