

# **Peebles ASC Privacy Policy**

We want to be really clear about your information, what we have, and what we use it for.

## **What information we collect and store**

Peebles Amateur Swimming Club will be a “controller” of the personal information that you provide to us in membership forms, entry forms and order forms unless otherwise stated. The data we collect and store is:

### **1 – Members’ personal data:**

When you register as a member of Peebles 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 some or all the following personal information:

- contact details – name, address, email address, date of birth, phone number, 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, additional support needs, etc; and
- other relevant personal information, for example, PVG membership number, etc.

### **2 – Volunteers’ personal data:**

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

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

### **3 – Athletes’ personal data:**

When you enter an event organised by Peebles ASC we will ask you or your club for some or all of the following personal information:

- contact details – name, date of birth, etc;
- participation details – events, personal best times;
- other relevant personal information, for example, additional support needs, etc.

## **Why we need your personal information**

### **1 – 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 training, pool use, etc.;
- set up your online membership account;

- send you membership communications by email in relation to essential membership services,

including but not limited to, general meeting notices, membership renewals, membership fees' information, etc.

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.

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, maintaining and sharing personal best times and checking your personal information to ensure you are entered into the correct category and with the correct personal best time;
- invite our members as award winners or guests to our annual awards dinner / ceremony, which includes asking our members to nominate individuals for awards and shortlisting such individuals to select the winners, who we will then contact by email;
- develop and maintain our members' and volunteers' 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. Where required, we will use your personal information to investigate your 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 at [secretary@peebleasc.co.uk](mailto:secretary@peebleasc.co.uk). 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.

## **2 – 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 [secretary@peeblesasc.co.uk](mailto:secretary@peeblesasc.co.uk). If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

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 Companies Act 2006 / Charities and Trustee Investment (Scotland) Act 2005 to maintain a register of our members, which includes our members' name, address, the date they were admitted to membership and the date on which they ceased to be our member, and hold general meetings, including issuing notices and voting arrangements;
- 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;
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

### **3 – Athletes personal data**

We need to collect athletes' personal information so that we can:

- 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;
- record times and maintain club records.

### **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 also share personal information with Scottish swimming, BEST or with other swimming clubs for the purposes of submitting, accepting and managing entries for joint training, competitions and sharing results.

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 and vulnerable adults. We may also share personal information with our professional and legal advisors for the purposes of taking advice.

A register of all swimmers personal best times will be maintained and displayed to the public at Peebles Swimming Pool. This will include only member name and personal best times. If members wish to have their personal best times removed and/or excluded from public display they can request this by writing to us at [secretary@peeblesasc.co.uk](mailto:secretary@peeblesasc.co.uk).

Peebles ASC employs third party suppliers to provide pool hire, email, direct debit payments and website hosting. 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 members of Scottish swimming as a condition of our affiliation.

Your registration directly 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 at

[https://www.scottishswimming.com/media/2455353/privacy-notice\\_members\\_february2018\\_final.pdf](https://www.scottishswimming.com/media/2455353/privacy-notice_members_february2018_final.pdf)

### **How we protect your personal information**

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

We may occasionally be required to transfer your personal information outwith the EU for the purposes of entering athletes into competitions, booking travel arrangements for training camps, etc. Where your personal information is transferred outwith the EU, 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**

#### **1 - 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 delete your personal information where you have not renewed your membership with us for 1 year.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of Peebles ASC and for how long. We need to do this to comply with the Companies Act 2006, which requires us to keep a register of members or in the event of a claim against Peebles ASC.

#### **2 – Athletes’ personal data**

We keep our athletes’ personal information for no more than 3 months after the date of the event.

Unless a record is set in which case only the name, date of birth and record time will be retained until such time as the record is broken.

## **Your rights**

You can exercise any of the following rights by writing to us at [secretary@peeblesasc.co.uk](mailto:secretary@peeblesasc.co.uk). 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 Peebles 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 [www.ico.org.uk](http://www.ico.org.uk)

You may change your preferences at any time or request that we stop sending you email communications by contacting us at [\*\*secretary@peeblesasc.co.uk\*\*](mailto:secretary@peeblesasc.co.uk).

## **COVID-19 Update**

As a result of the worldwide Coronavirus pandemic, we may need to record information regarding whether you are displaying from any symptoms of COVID-19, have been in recent contact with anyone who has tested positive or is displaying symptoms of COVID-19, have any underlying health conditions or have, or are in close contact with anyone who has, been advised to shield. This information would be required to ensure the safety of members attending Peebles ASC.

## **Why we need your data**

Our lawful basis for processing health information relating to COVID-19 is:

- to protect your vital interests; and/or
- for the legitimate interests of members attending Peebles ASC to ensure individuals' safety and prevent the spread of the virus.

As health information falls within the definition of "special categories of personal data" under applicable data protection legislation, we also need a special condition to process such information. We may need to process this health information:

- to protect your vital interests where you cannot consent;
- for reasons of public interest in the area of public health, including protecting against serious cross-border threats to health where we have a legal duty of confidentiality to you; and/or
- with your explicit consent (if required).

## **Information we may collect about you**

We may collect data from you in relation to COVID-19:

- From a return to water self declaration and/or a regular health check survey – detailing whether you have symptoms of COVID-19, if you have come into contact with someone with COVID-19, history of having COVID-19, and underlying health conditions.
- Should you report contracting COVID-19 through to the COVID Officer or Club Committee Member.

### **Who we share your personal data with**

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with public health obligations. In the event that we do share personal information with third parties, we will only share such personal information as is 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.

Where a case of COVID-19 is recorded within the club, your personal information will not be shared with other members directly, however members will be advised that a case has occurred, whilst keeping personal information anonymous as far as possible.

### **How long will we store COVID-19 specific data?**

We will only keep your personal information for as long as necessary in line with legal obligations – laws or regulation may set a minimum period for which we have to keep your personal information.

Contact information: **pasc\_account@hotmail.co.uk**