



## **DINGWALL AMATEUR SWIMMING CLUB PRIVACY POLICY**

### **1. What we need**

Dingwall Amateur Swimming Club is a swimming club based in the Highlands of Scotland and is an affiliated member of Scottish Swimming. Dingwall Amateur Swimming Club will be a 'controller' of the personal information you provide to us through this website, emails and any manual form.

When you register as a member of Dingwall Amateur Swimming 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:

- Contact Details - name, address, telephone number, email address, date of birth;
- Membership Criteria/Category - for example, athlete, parent, volunteer;
- Medical Information – general health information, medical history and any health conditions, etc;
- Consents – your consent to various DASC Policies/Codes of Conduct
- Participation Details - for example, parent, athlete;
- Equality Information - for example, disability, sex.

When you volunteer with Dingwall Amateur Swimming Club we will ask you for the following personal information:

- Contact Details - name, address, email address, date of birth;
- Participation Details - for example, parent, committee;
- PVG Membership, if appropriate.

### **2. Why we need your personal information - contractual purposes**

We will 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, competition entry, team selection and PVG checks;
- Setting up your online membership account and access to our Club website to view swimmers time results
- Send you membership communications by email (or other means) in relation to essential membership services, including but not limited to: general meeting notices, membership renewals, membership fee information, competition entries, general swimming information.

If you do not provide us with all of the personal information that we need, this may affect our ability to offer the above membership services and benefits.



### **3. Why we need your personal information - legitimate purposes**

#### Members Personal Data

We also process our members' personal information in pursuit of our legitimate interests. These legitimate interests are to:

- Promote and encourage participation in swimming by sending members' communications and 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 capture 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 that you are entered into the correct category;
- Develop participation in swimming by monitoring members' engagement, participation and physical development through attendance registers, competitions results etc;
- Invite our members as award winners or guests to our annual awards ceremony, which may include asking our members to nominate individuals for awards and shortlisting such individuals to select the winners, who we will then contact by email (or other means);
- Develop and maintain our coaches and volunteers' qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verifying 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 with respect to grievance and disciplinary procedures; for example, we will use your personal information to investigate your complaint, to suspend membership, or take disciplinary action.

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. 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 you can act as a 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 this purpose. If you wish to object to any of the above processing, please contact us. If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

#### **4. 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. Our obligations are set out 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;
- Sports Scotland / Scottish Swimming regulatory requirements, to maintain registration to Scottish Swimming to allow participation in competitions and swimming within the club;
- The Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

#### **5. Other uses of your personal information**

We may ask you if we can process your personal information for additional purposes.

If 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.

#### **6. Who we share your personal information with**

We may be required to share your personal information with certain other bodies for specific purposes.

- If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with Dingwall Amateur Swimming Club and local press 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.



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 the recipients shall only process the disclosed personal information in accordance with those purposes.

#### Dingwall Amateur Swimming Club members' personal data

As a condition of our affiliation to Scottish Swimming we are required to ensure that all our members are members of Scottish Swimming. We will share personal data as detailed above 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.

Scottish Swimming's private notice explains how they use your personal information and can be accessed here <https://www.scottishswimming.com/privacy-policy.aspx>

#### Athletes' / Participants' personal data

We publish the results of our competitions on our website.  
This includes the names, age and results of competitors.

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

Your personal information is stored on our electronic filing system as well as Team/Meet Manager, Google Forms and our Club Database which is accessed and controlled by our coaches and volunteers for the purposes set out above. Our servers are based in the UK and US and are accessed by our staff / volunteers for the purposes set out above.

Privacy Notices for Team/Meet Manager and Google can be viewed here;  
<https://sportstek.co.uk/terms-conditions>  
<https://policies.google.com/privacy?hl=en-GB&gl=uk>

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

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



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

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.

## **9. Your rights**

You have rights in relation to your personal information.

- 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.
- If you wish us to delete your personal information, you may request that we do so.

You can exercise any of these rights by writing to us.

Any requests received by Dingwall Amateur Swimming 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.