



## **Data Protection Policy for Members of Hertford Swimming Club**

### **About this document**

This privacy policy sets out the way we process your personal data and we've created this privacy policy to make sure you are aware of how we use your data as a member of Hertford Swimming Club (HSC). General Data Protection Regulations (GDPR) will come into effect on 25 May 2018 and will replace the Data Protection Act 1998. Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

HSC is the Data Controller and is responsible for how your personal data is processed, stored and its use, and to ensure it is done in a fair, lawful, secure and transparent way.

### **Personal data we hold on you**

The membership information you provide when you agree to trial for HSC is kept secure until the outcome of the trial. The information is provided on the Trials and Swim England Registration Form. This includes: your name, date of birth, address, e-mail address, phone number, name of the any other Swimming Clubs with which you are registered and gender. We also ask for relevant disability and medical information to ensure you can train and compete safely.

Upon successful trial, members are invited to join HSC and asked to complete the New Swimmer Squad Accept Form. This form



contains an opt-in to consent for SE registration along with agreement for HSC to hold your data for Club administration. Your data are also logged with Swim England (SE) along with additional details of Ethnicity, and registers the Country of Representation as England. If you wish to change any of these options or any other personal data we hold please contact [membership@hertfordsc.co.uk](mailto:membership@hertfordsc.co.uk).

Parents or guardians of swimmers U18 must complete and sign a section of both Forms, thereby giving consent for the collection of data for anyone below 18 years of age.

## Why we hold your data

- For the committee to manage the membership of the Club
- Manage Coaches and Volunteers of the Club
- Communication with members via email, text or telephone
- Contacting parent/next of kin in the event of emergency or illness during training sessions or at competitions or open meets
- Recording attendance at the Club
- Recording and monitoring personal swim times for team selection
- Entering swimming competitions and open meets,
- Preparation of Squad fees and recording those paid and due
- Maintaining our Club accounts and ledgers
- To share your contact details with the Governing Bodies e.g. Swim England to maintain your membership
- Operate and update the HSC web site with news of the Club and members
- To inform individuals of news, events, activities or services running at HSC
- For the purposes of our legitimate interests in operating the Club



## **Trials for entry to HSC**

When we are approached for a trial for membership we ask for the same personal data as if joining the Club, as detailed above. Unsuccessful trials result in this personal data being destroyed or deleted immediately. In some cases where they are advised to re-trial in 6 months, such data are retained and safely stored in line with members data.

## **Processing of Personal data**

HSC complies with its obligations under the GDPR by

- keeping personal data up to date;
- by storing and destroying it securely;
- by not collecting or retaining excessive amounts of data;
- by protecting personal data from loss, misuse, unauthorised access and disclosure
- by ensuring that appropriate technical measures are in place to protect personal data, such as password protection on laptops and tablets which hold member details

## **Sharing your personal data**

Your personal data will be treated as strictly confidential, and will be shared only with:

- Swim England and British Swimming: for membership information, results, rankings & records (as detailed above)
- Other Swimming clubs: open meet entries, results & records



- Other bodies where required to do so by law or in connection with legal proceedings.

We will only share your data with other third parties outside of the Club with your consent, which is assumed when submitting entry forms for open meets and organised swimming competitions.

Prior to organised swim events such as open meets and club championships, the Club will distribute to all members involved in such an event, via email, a Hy-tek file of all Club entries to such competitions for member's review. This is essential to ensure that entries are correct. The names and swim times of all members entered in such events is available to view in this file.

## **British Swimming Website Membership**

British Swimming publish on their 'Membership Check' web page a list, generally available to the public, of SE registered members' names, club, SE number/category & swimming-related information eg any coaching or officiating qualifications held. Personal contact and medical information is NOT displayed. If you do not wish your swimming details to appear on this list you may select the 'hide' option on the British Swimming 'Membership Check' page at any time. Allowing your data to appear on this list (ie not hiding them) simplifies Club administration and enables swimmers' times from qualifying events to be on the British Swimming 'Rankings' database. If a swimmer's time is not visible on the rankings database it may affect their ability to enter competitions as event organisers may require proof of age and of eligibility to enter. The club therefore recommends members not to hide their details.



## **How long do we keep your personal data**

We keep your personal data for no longer than reasonably necessary. We aim to delete and destroy your personal data as soon as we receive notification that you have left the Club. However, your details will remain registered with SE until the end of the calendar year, as their membership is valid for a whole year. You can “hide” your data at any time by following the details on the SE website as detailed above.

## **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Protection Policy, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## **Your rights and your personal data**

Unless subject to an exemption (under the GDPR), you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which HSC holds about you;
- The right to request that the HSC corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for HSC to retain such data;



- The right to withdraw your consent to the processing at any time; This may mean that you cannot participate fully in the activities of the club.
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable).
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data, (where applicable).
- The right to lodge a complaint with the Information Commissioners Office.

## Contact and complaints

If you have any queries about this privacy policy or how we process your personal data, or if you wish to exercise any of your legal rights, or queries of complaints please in the first instance contact [info@hertfordsc.co.uk](mailto:info@hertfordsc.co.uk)

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.