

## ORION SWIMMING CLUB PRIVACY NOTICE

### Who are we?

We are Orion Swimming Club and you can contact us at enquiries@orionswimmingclub.co.uk.

### Privacy Promise

At the Orion Swimming Club we take protecting your data and our legal obligations very seriously. We promise:

- To keep your data safe and secure
- To comply with data protection law including the EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA)
- Not to give your data to others without your consent or in line with the law
- To comply with your legal rights to access and manage your data

We also promise to comply with the 6 principles set out in GDPR which are (in summary) that data shall be:

1. *processed lawfully, fairly and in a transparent manner* in relation to individuals;
2. *collected for specified, explicit and legitimate purposes* and not further processed in a manner that is incompatible with those purposes;
3. *adequate, relevant and limited to what is necessary* in relation to the purposes for which they are processed;
4. *accurate and, where necessary, kept up to date*;
5. *kept in a form which permits identification of data subjects for no longer than is necessary* for the purposes for which the personal data are processed; and
6. *processed in a manner that ensures appropriate security* of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### How the law protects you

The law says that we can only process your personal data if we have a proper reason to do so. If we process your personal data we will always use one or more of the following reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interests, or

- When it is in your or another person's vital interests, or
- When you consent to it.

The law also says that when we process your "special data", for example data on your health, we need to have a specific lawful reason for processing this special data. If we process data on your health we will always have one of the following legal reasons:

- When you consent to it; or
- To protect your or another individual's vital interests if you are not capable of giving consent; or
- because the processing is necessary to carry out obligations under employment law; or
- because the processing is necessary to establish, exercise or defend a legal claim.

#### **Data we collect and process on you:**

When you join the Orion Swimming Club, we ask you to fill in an Orion membership form and to join Orion via the Orion online portal at <http://www.active.com/birmingham-westmidlands/water-sports/swimming-registrations/orion-swimming-club>.

#### **a) Swimmers**

We collect the following data on swimmers:

- Name
- Contact details including, postal address, email address, telephone and mobile number (if swimmer is aged 18 or above).
- Age
- Emergency contact details
- Details of any health conditions (this is special data)
- Whether or not the swimmer has a registered disability

Our legal basis for processing this information is our legitimate interests as a swimming club to process this data about our swimmers. Our legal basis for processing any information about your health conditions, which is special data, will usually be your consent.

### **b) Parents**

We collect the following data on parents:

- Contact details including name, postal address, email address, telephone and mobile number
- Details of your car (so that we can provide a parking permit for you at our sites)

Our legal basis for collecting this data is our legitimate interests as a swimming club to process this information about our parent members.

### **c) Coaches**

We will process the following information about our coaches:

- Contact details including name, postal address, email address, telephone and mobile number
- recruitment information such as your application form and CV, references and qualifications;
- contact details for your emergency contacts;
- your date of birth, gender, marital status and family details;
- information about your working arrangements with us;
- your bank details and information in relation to your tax status including your national insurance number;
- information relating to any complaints;
- training records;
- your images;
- information about your health (this is special data);
- information about criminal convictions or offences in order to assess your suitability for the role; and
- any other category of personal data which we may notify you of from time to time.

We will process this information to fulfil our contract with you. If we want to process information about your health or your criminal convictions or offences we will usually ask for your consent, or we may need to process information about your health to deal with any legal claims arising.

### **d) Swimming Trials**

If you apply for a free trial by clicking the relevant tab on our website, we will ask you for the following information:

Name of parent  
Contact number  
Email address  
Name of swimmer  
Age of swimmer  
Swim Level and History  
Information about health relevant to swimming

We will process this information because of our legitimate interest in offering free trials to prospective members, and we will process special information about your child's health if you consent to this.

If your child is on the waiting list this data will be kept until you are informed that a place becomes available. If you do not take up the offer of a place your details will be removed from our system.

### **e) Photographs**

We also sometimes take photographs of swimmers, parents and coaches. Photographs may be taken at galas or at social events. Photographs may be used on our website, our social media sites or on our notice boards. When you become a member of Orion we ask for your consent to our taking such photographs. You may withdraw your consent at any time by emailing [lozorionsc@gmail.com](mailto:lozorionsc@gmail.com).

### **How long we will keep your information**

If you are a member, we shall keep your information for as long as you are a member of the Orion Swimming Club, and for up to a year afterwards, as it can take this long for your membership to expire from Active. If you are a coach, we shall keep your information for as long as you are a Coach for the Orion Swimming Club and for a year after that period, in case you have any complaints against us which we have to resolve or defend. We will keep a summary of your working record for us for five years after you have finished coaching for us so that we can provide a reference for you if you ask for this.

### **Sharing Information**

We share personal data, including name, date of birth, gender, address, ASA number, phone numbers and email addresses of parents and swimmers and the name and ASA number of coaches, to the Amateur Swimming Club (ASA). They keep this information in accordance with data protection law and with their Privacy Policy which can be found on their website.

We also share the names, dates of birth, genders and ASA numbers of swimmers to other swimming clubs and to ASA leagues, for example when our swimmers enter

their galas and we also share the names and email addresses of parents and swimmers with Teamer.net so that we can invite swimmers to and manage our club entries to swimming galas.

We share information about our coaches if requested to provide an employment reference, and if required by law, for example in response to an enquiry by HMRC.

We will not share your data to others without your prior consent unless otherwise required by law.

### **Communications and Marketing**

We will contact you, usually by email, with news and updates about our swimming sessions, Club events and galas etc, because of our legitimate interests in keeping our members informed about our activities. We do not need your consent for this.

We will not send you marketing information without your consent and we will ask you whether you want the ASA to send you marketing information.

### **Your rights**

You have the right to:

- access the personal data we hold about you, free of charge in the majority of cases, within 30 days;
- the correction of your personal data when incorrect, out of date or incomplete;
- withdraw consent to the processing of your personal data;
- request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected.
- object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop;
- be notified of a data security breach concerning your personal data.

If you want to exercise any of your rights, above, please contact the Chair of Orion Swimming Club at [lozorionsc@gmail.com](mailto:lozorionsc@gmail.com)

### **What to do if you are not satisfied with how we handle your personal data**

If you are unhappy with how we are handling your personal data, please contact the Chair of Orion Swimming Club at [lozorionsc@gmail.com](mailto:lozorionsc@gmail.com)

If you are not satisfied with our response you can contact the Information Commissioner using the link at <https://ico.org.uk/concerns/> or by telephone at 0303 123 1113.