

# Data Privacy Notice

## The information we need

Silver City Blues (Masters) Swim Club is a non-profit organisation dedicated to the provision of masters swimming activities in Aberdeen and the Aberdeenshire area. The club is affiliated to Scottish Swimming, a constituent part of British Swimming Limited. All Club Members are also members of Scottish Swimming.

Silver City Blues (Masters) Swim Club will be the “controller” of personal information provided to the Club by the Members through the membership form (known as Google Forms), unless otherwise stated. When registering as a member of Silver City Blues (Masters) Swim Club or when renewing membership, the Club will ask for the following personal information:

- First name, last name, email address, post code, date of birth, contact telephone number (mobile or land line) and emergency contact details.
- Membership category (Training/Competition/Volunteer/Coach).
- Participation details – other disciplines

Associate Members of Silver City Blues (Masters) Swim Club, will be asked to provide the following personal information:

- First name, last name, email address, post code, date of birth, contact telephone number (mobile or land line) and emergency contact details.

Individuals who take part in competitions or events organised by Silver City Blues (Masters) Swim Club may be asked to provide the following personal information:

- First name, last name, email address, date of birth, contact telephone number (mobile or land line), gender, SASA number, club.

## Why we need your personal information – contractual purposes

Members’ personal data:

The Club collect personal information of Members to manage the Club’s overall membership. The Club will use Members’ personal information to:

- Provide Members with core services, including maintaining annual membership with SASA which provides Members with insurance while training at Club sessions, voting at the AGM, and information of competitions.
- Set up online membership with SASA; and
- Distribute membership communications by email in relation to essential membership services, including but not limited to, AGM notices, membership renewals and membership fees.

If a Member does not provide the Club all the requested personal information this may have a detrimental affect the Club’s ability to offer the above membership services and benefits.

Participants' personal data:

When you register for a competition, event, training course, etc., we need to collect your personal information so that we can honour your booking and to enable you to participate in the course, competition, event, etc.

If you do not provide us with all of the personal information that we need to collect, then this may affect the Club's ability to enter you in a competition or event or book your place on a training course.

### **Why we need your personal information – legitimate purposes**

Members' personal data:

The Club also processes Members' personal information in pursuit of our legitimate interests to:

- Promote and encourage participation in Masters Swimming by sending Members' communications and booking information about upcoming competitions and events. The Club's competitions and events may be filmed or photographed, and Members' personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes.
- Host competition in Masters Swimming by accepting and managing entries for competitions held by the Club and checking entrants' personal information to ensure they compete in the correct category.
- Monitor and develop participation in Masters Swimming by monitoring Members' engagement and participation through training/competition/social events and inviting our Members to participate in surveys for researching and development purposes.
- Invite Members as award winners or guests to the Club's annual awards (Christmas). This includes asking Members to nominate individuals for awards and shortlisting such individuals to select the winners, who the Club will then contact by email.
- Develop and maintain Members' qualifications, including sending email communications to Members to inform them of upcoming courses, renewal requirements and verify that mandatory training course and PVG / child protection requirements are met / completed.
- Communicate with Members regarding questions, comments, support needs or complaints, concerns or allegations in relation to aquatic disciplines. The Club will use Members' personal information to investigate any complaints, to suspend membership and to take disciplinary action where appropriate.
- Run the Scottish Swimming membership check which can be found online at: [Membership check | Scottish Swimming](https://www.scottishswimming.com/membership/membership-check) (<https://www.scottishswimming.com/membership/membership-check>).
- In addition to being a sports club, the Club is also a Social club, and therefore will be contacting Members about social events and activities organised by the Club for its Members or for the advertisement of branded club kit.

Where the Club processes a Member's personal information in pursuit of legitimate interests, Members have the right to object to their personal information being used for the above purposes. Any objections should be made in writing and submitted to the Membership Secretary (scbukmembership@gmail.com). If the Club agree and comply with the Member's objection, this may affect the Club's ability to undertake the tasks detailed above for the benefit of the Member.

Volunteers' personal data:

The Club will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where the Member is required to complete a Protection of Vulnerable Groups (PVG) check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme.

If a PVG certificate is not clear, the Club will have legitimate interest to collect references and any other applicable information to allow consideration as to whether or not the individual can volunteer in a regulated role with children and/or vulnerable adults.

Where the Club processes personal information in pursuit of our legitimate interests, Members have the right to object to their personal information being used for the above purposes. Members and participants in club organised events should submit all objections in writing to the Membership Secretary (scbukmembership@gmail.com). If the Club comply with the objection, this may affect the Club's ability to undertake the tasks detailed above for the benefit of the volunteer.

### **Why we need your personal information – legal obligations**

The Club are under a legal obligation to process certain personal information relating to Members, volunteers and participants for the purposes of complying with our obligations under:

- The Protection of Vulnerable Groups (Scotland) Act 2007 to check that the Club's coaches and volunteers are able to undertake regulated work with children and vulnerable adults.
- The Equality Act 2010, which requires the Club to process personal information of its Members to make reasonable adjustments where necessary.

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

The Club may ask its Members for permission to process personal information for additional purposes. Where this is the case, the Club will provide Members with an additional privacy notice with information on how we will use your information for these additional purposes.

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

If a Members' personal information is included in any images or videos taken by the Club at a training session, competitions and/or event, the Club may share this information on the Silver City Blues (Masters) Swim Club public website ([www.silvercityblues.org.uk](http://www.silvercityblues.org.uk)) or public Facebook page (<https://www.facebook.com/SCBMasters>) in order to publicise club activities; or on the Silver City Blues (Masters) Swim Club's closed Facebook group (<https://www.facebook.com/groups/SilverCityBlues>) or closed YouTube page

(<https://www.youtube.com/silvercitybluesorguk>) as part of the training program. The Club may also share this data on other Social Media sites controlled by the Club and with Scottish Swimming for promotional and/or journalistic purposes.

If a member does not wish images and videos which they are part of to be shared, please contact the Membership Secretary in writing and submit to [scbukmembership@gmail.com](mailto:scbukmembership@gmail.com).

The Club 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 Members.

The Club may also share personal information with professional and legal advisors for the purposes of taking advice.

In the event that the Club do share personal information with stakeholders and external third parties, only personal information strictly required for the specific purposes will be supplied and the Club will take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

#### Scottish Governing Body (SGB) members' personal data

As an affiliated club of Scottish Swimming, the Club are required to ensure that all of our members are members of Scottish Swimming as a condition of our affiliation. The Club will share Membership information 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 here [Data Protection | Scottish Swimming](http://www.scottishswimming.com/about-us/data-protection/) ([www.scottishswimming.com/about-us/data-protection/](http://www.scottishswimming.com/about-us/data-protection/)).

#### Athletes' / Participants' personal data

The Club may publish the results of our competitions on our website. This may include competitors' name, age, club and result.

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

Your personal information is stored on our password-protected electronic filing system in Dropbox, accessible only by active Silver City Blues Committee Members for the purposes set out above. Dropbox stores data in servers in the US and through its policies is compliant with GDPR.

We may 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 a Member's 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.

Communication to Members via email is done using Mailchimp; access is restricted to active members of the Silver City Blues committee. MailChimp's servers are based in the US but have signed up to the "Privacy Shield", which is an agreement between the US and EU Commission relating to the protection of personal data – this constitutes a "safeguard" under the GDPR.

Silver City Blues uses Google Drive, through Google Forms and Google Spreadsheets to collect and store personal data of the Club's Members for joining and renewal of membership. Access is restricted to active Officers of the Club and the Membership Secretary, for the purposes set out above. In conjunction with this document, the Google platforms are GDPR compliant.

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

Members' personal data

The Club will only keep Members' personal information for as long as necessary to provide membership services. Unless you ask us not to, the Club will review and possibly delete a Member's personal information where you have not renewed your membership with us for six years, unless the Member has provided permission for the personal information to be stored.

The Club will keep certain personal information of Members for longer in order to confirm Members' identity, when you were a member of Silver City Blues (Masters) Swim Club and for how long. The Club need to do this in the event of a claim against Silver City Blues (Masters) Swim Club.

### **Your rights**

A Member can exercise any of the following rights by writing to the Membership Secretary at [scbukmembership@gmail.com](mailto:scbukmembership@gmail.com). Members' rights in relation to your personal information are:

- You have a right to request access to the personal information held by the Club about you by making a "subject access request".
- If an individual believes that any of their personal information is inaccurate or incomplete, they have the right to request that the Club correct or complete your personal information.
- A Member has the right to request that the Club restrict the processing of their personal information for specific purposes.
- If you (a Member or former Member) wish the Club to delete your personal information, you may request that we do so.

Any requests received by Silver City Blues (Masters) Swim Club will be considered under applicable data protection legislation. If a Member remains dissatisfied with the decision reached by the Committee, they have the right to raise a complaint with the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk)

### **Why we need your personal information – event notifications**

Where permissions have been given, the Club would like to contact Members with email notifications about events which are organised by Silver City Blues (Masters) Swim Club or events which the Club will be participating in.

When a new Member joins the Club, email communications for social events / annual meet / other upcoming meet information in which Silver City Blues (Masters) Swim Club might like to participate in will be periodically sent to them.



Relevant Members of Silver City Blues (Masters) Swim Club will receive emails containing information requesting assistance at upcoming events or information on relevant upcoming training courses.

Participants in events organised by Silver City Blues (Masters) Swim Club may be sent email communications regarding other relevant events

Member's communication preferences can be changed at any time or requests that we stop sending you email communications by contacting the Membership Secretary ([scbukmembership@gmail.com](mailto:scbukmembership@gmail.com)).

There is also an 'unsubscribe' button at the bottom of every email communication sent out by the Club.