



NORTH BERWICK SWIMMING CLUB PRIVACY NOTICE

NBSC has created this bespoke privacy notice for its own use, based on the headings required under the GDPR.

What we need

North Berwick Swimming Club is a voluntary organisation which is affiliated with Scottish Swimming. It's structure includes Junior Members, Adult Members (including Masters) and a Management Committee.

North Berwick Swimming Club will be a "controller" of the personal information that you provide to us online unless otherwise stated.

Option 1 – Members' personal data:

When you register as a member of North Berwick Swimming Club or renew your membership (including if you are registering or renewing on behalf of a child under the age of 16 years, we will ask you for the following personal information:

- contact details – name, address, email address, date of birth;
- membership criteria / category – for example, athlete, parent, volunteer, etc;
- payment details – bank account number, sort code etc.;
- participation details – for example, parent, athlete, etc.;
- equality information – for example, disability, etc.; and
- any other personal information, for example, PVG membership, etc..

Option 2 – Volunteers' personal data:

When you volunteer with North Berwick Swimming Club, we will ask you for the following personal information:

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

If the club collects personal data of which it is the controller and then discloses such personal data to a third party (for example a Scottish Governing Body (SGB)) that third party becomes the controller of the disclosed personal data.

Why we need your personal information – contractual purposes

Option 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 key service purposes, for example, insurance, licensing, voting, etc.;
- set up your online membership account; and
- 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.

Option 2 – Participants' personal data:

When you book a place with us for and attend a coaching course, 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 our ability to book your place.

Why we need your personal information – legitimate purposes

Option 1 – Members' personal data:

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 and checking your personal information to ensure you are entered into the correct category;
- monitor and develop participation in swimming by monitoring members' engagement and participation through inviting our members to participate in surveys for researching and development purposes;
- invite our members as award winners or guests to our annual awards BBQ / ceremony etc, 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' 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. We will use your personal information to investigate your complaint, to suspend membership, take disciplinary action, etc.; and

- maintain poolside registers of members' parent/guardian's contact details for every session

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 nbswimclub@gmail.com

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.

Option 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 nbswimclub@gmail.com. If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

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 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;
- sportscotland regulatory requirements – Not Applicable
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary

Other uses of your personal information

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

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 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.

North Berwick Swimming Club employs third party suppliers to provide services, including a website domain provider and Love Admin. 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.

Option 1 – SGB members’ personal data

As an affiliated club of SASA (Scottish Swimming) we are required to ensure that all of our members are members of SASA as a condition of our affiliation.

We will share your name, date of birth and contact information with SASA who will become a controller of your personal information when they receive it. SASA’s privacy notice explains how they use your personal information and can be accessed here https://ocs-sport.ams3.cdn.digitaloceanspaces.com/scotswim-full/2023/03/Privacy-Notice_Members_March-2023.pdf

Option 2 – Athletes’ / Participants’ personal data

We publish the results of our competitions on our website. This includes competitors’ name, age, result.

How we protect your personal information

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

We are required to transfer your personal information outwith the EU for the purposes of for example, 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

Option 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 possibly delete your personal information where you have not renewed your membership with us for 2 years.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of North Berwick Swimming Club 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 North Berwick Swimming Club.

Option 2 – Athletes’ personal data

We keep our athletes’ personal information for the duration of their membership.

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 at nbswimclub@gmail.com

Your rights

You can exercise any of the following rights by writing to us at nbswimclub@gmail.com

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 North Berwick 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 at www.ico.org.uk

SGB template - consent section for privacy notice

Why we need your personal information – marketing.

Where you are happy for us to do so, we would like to contact you by email with information about swimming, our latest news and upcoming events / competitions / courses.

If you would like to receive email communications from us, please select from the following options below:

information about swimming;

latest news;

details of upcoming events

Once you submit your preferences to us, we will send you an email to confirm these. Please note that we will not email you with any information until you have confirmed your preferences by responding to our email.

You may change your preferences at any time or request that we stop sending you email communications by contacting us at nbswimclub@gmail.com

Details of third-party service provider: Love Admin

www.loveadmin.com

The Octagon, 1st Floor Office Suites, Brighton Marina, Brighton BN2 5WB