

**WARRENDER BATHS CLUB**  
**PRIVACY NOTICE**  
**To all Members**

**Background**

The purpose of this privacy notice is to provide you with information on how Warrender Baths Club, a not-for-profit organisation governed by its Constitution and Bye-Laws and affiliated to Scottish Swimming (“the Club”) collects and uses your personal data outlined below, the conditions under which we may disclose it to others and how we keep it secure.

The Club takes the protection of the data that we hold about all of our members (as defined in the Club’s Constitution and Bye-Laws and hereinafter referred to as “Member(s)”) seriously and will do everything possible to ensure that data is collected, stored, processed, maintained, cleansed and retained in accordance with current and future UK data protection legislation.

For the avoidance of doubt, this privacy notice supersedes any previous data protection notices provided to you or issued by the Club.

**Information about us**

References to “we, “us” or “our” mean the Club.

References to “you” or “your” mean Member or swimmer/water polo player (hereinafter referred to as “Athlete Member(s)”) or parent on behalf of Athlete Member where this is a child under the age of 16.

**Information we may collect about you**

We may collect and process the following personal data about you in the context of your membership with us (“Personal Data”):

- From Members’ details – first name, surname, address, date of birth, gender, Scottish Swimming identification number, email address (for children this is the parent email address), membership/participation category.
- From Athlete Members’ details – Member’s details as specified above and, in addition, parent/s name and home and mobile contact numbers, address and email; and name of Athlete’s parent volunteer and any second parent volunteer.
- From Parent and Swimmer Code of Conduct (for development squads) and Declaration of Intent (for National Squads) – Athlete Member mobile phone number (if any) as required by Scottish Swimming’s Mobile Phone Policy.
- From Medical Forms – Athlete doctor's name and address; name, address and contact number of emergency contacts, dietary requirements and food allergies, medical conditions requiring treatment and details of medication, anything else we should know about Athlete

Member (eg. learning difficulties). This data is held with the explicit consent of the Athlete Member/Athlete Member's parent.

- For National squads, in addition to the data provided by the Medical Form above, we also collect from you, Athlete Member's doctor's telephone number, details of health insurance, dates of immunisation and consent to medical care during camps/trips/meets and consent to under 16 year olds signing out of camps.
- For National Performance squad Athlete Members who are on Scottish Swimming Youth Squad, Senior Silver Squad, or Senior Gold Squad ("hereinafter referred to as "the Scottish Swimming Performance Pathway Athletes"), we receive from the Sportscotland Institute of Sport, the following sensitive Personal Data - blood lactate values along with times achieved; Anthropometric measurements; Nutrition plans; Above and underwater race footage; Body mass data; Psychology questionnaires/plans; Kinesiology profiling; Training report including hours and volume of training, hours of sleep, perceived fatigue, perceived exertion; Strength and conditioning programme. This sensitive Personal Data is held only by the National Performance Squad Coach, with the explicit consent of the relevant athletes.
- Volunteer roles, including names of parent volunteers, roles fulfilled or offered, names of Swimming Technical Officials; qualifications gained and/or courses undertaken.
- PVG membership information and confirmation of completed PVGs.
- For Members who provide coaching services to the Club, we will store and use the personal information which you provided to us in your cover letter and CV and may ask you for additional personal information during the period in which you provide coaching services to the Club which shall be collected, stored and used in accordance with this Privacy Notice.

#### **Why we need your Personal Data (contractual purposes)**

We need to collect and process Members' Personal Data so that we can manage your membership and administer Members' involvement in the sport.

We will use Members' Personal Data -

- so that we can provide you with core member services including (but not limited to) registration with our governing body, Scottish Swimming; effectively administering Athlete Members' contracts for provision of coaching services and competitive opportunities; insurance; Annual General Meetings and voting rights in terms of our Constitution and Bye-Laws;
- to facilitate online payment of annual subscription dues;
- to set up your account on our book-keeping software which allows us to process financial transactions, including those for meet entry fees and other expenses incurred by or on your behalf;

- to send you membership communications by email in relation to essential membership services including, but not limited to, squad training, competitions and other athlete events, general meeting notices, membership renewals, membership fees information and invoices;
- to honour your confirmed entries for swim meets and competitions and bookings for coaching and training courses to enable you to participate in the meet, competition or course;
- to organise club activities and manage risk and safety at training and at meets, competitions, events, trips and training camps.

If you do not provide us with all of the Personal Data that we need to collect then this may affect our ability to offer the above membership services and benefits.

### **Why we need your Personal Data (legitimate purposes)**

We also collect and process Members' Personal Data in pursuit of our legitimate interests to:-

- promote and enhance the public participation in competitive swimming, Masters swimming and Water Polo by sending to Members communications and booking information for upcoming competitions and events. Our own Club competitions and events may be filmed or photographed, subject to the terms of the Scottish Swimming Child Protection Policy, and your personal information may also be used in images captured from our competitions and events, which we use for promotional and/or journalistic, education and development purposes;
- provide competition in swimming and Water Polo by accepting and managing entries for competitions and checking your Personal Data to ensure you are entered in the correct category. This extends to athlete Member swim event times with name, age and result. External swim meet results are published publicly on the British Swimming rankings referred to below, and the Club's own internal development meet and internal time trial results will be published on the Club website.
- to meet regulatory requirements for Members to hold specific qualifications enabling them to carry out roles on behalf of the Club and to develop and maintain Members' qualifications, including sending email communications to Members to inform you of upcoming courses and renewal requirements and verify that you have completed any mandatory training and PVG/child protection requirements. If you do not provide us with all of the Personal Data that we need to collect then this may affect our ability to secure your place on training courses and your ability to volunteer on behalf of the Club.
- to monitor and develop participation in competitive swimming and Water Polo by monitoring Members' engagement and participation through records of attendance at training sessions and competitions and by inviting Members to participate in surveys for research and development purposes. All data collated from any such surveys will be anonymised.

- to invite Members as award winners or guests to our annual awards ceremony;
- to keep Members advised of Club results, activities, events, fundraising and general information by email and by sending the Club newsletter by email, subject always to your right to stop receiving these communications by contacting [wbcdataprotection@gmail.com](mailto:wbcdataprotection@gmail.com)
- to respond to and communicate with Members regarding your questions, comments, support needs or complaints, concerns or allegations. We will use your Personal Data to investigate your complaint, and to take disciplinary action where appropriate, all in terms of the Club's policies and procedures and those of Scottish Swimming as the Club's governing body.

Where we process your Personal Data in pursuit of our legitimate interests, you have the right to object to us using your Personal Data for the above purposes. If you wish to object to any of the above processing, please contact us at [wbcdataprotection@gmail.com](mailto:wbcdataprotection@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.

### **Why we need your Personal Data (legal obligations)**

We are under a legal obligation to process certain personal information relating to Members for the purposes of complying with our obligations 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;
- Sportscotland regulatory requirements to provide information relating to participation levels, provided that any individual is not identified from such information.

### **Other Uses of Members' 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.

In addition to the above, we reserve the right to collate, process and disseminate any statistics based on an aggregation of data held by us provided that any individual is not identified from the resulting analysis and provided that the collation, processing and dissemination of such information is permitted by law.

### **Who we share your Personal Data with**

We may disclose your Personal Data to third parties with whom we engage or contract in the conduct of our business. For example, for active competitive Athlete members, your basic personal information (name, gender, date of birth, results and which club(s) you are a member of) is shared with organisers of external meets, who then share this information with British Swimming rankings system, which can be found at <https://www.swimmingresults.org>. British Swimming will be the "controller" of such personal information upon receipt.

We engage a third party supplier to provide meet manager services, including collecting meet entries from our Meet Entries Secretary, drafting meet programmes, setting start sheets and collating and circulating results. This supplier may process Personal Data (which we have provided to them) on our behalf as “processors” and are subject to written contractual conditions to only process that Personal Data under our instructions and to protect it.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with legal obligations. Such organisations include Disclosure Scotland and Police Scotland for the purpose of safeguarding children and vulnerable adults.

We may include your photo on our websites and for promotional and/or journalistic purposes, subject always to your right to request that we do not do so by contacting us at [wbcdataprotection@gmail.com](mailto:wbcdataprotection@gmail.com);

We may share anonymised Personal Data with Sportscotland for the purposes of monitoring participation in and use of Community Sports Hubs;

We may disclose your Personal Data to our professional and legal advisors for the purposes of taking advice;

In the event that we do share personal information with third parties, we will only share such personal information as is 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. We will not transfer Members’ data outside of the European Economic Area.

### **How we store your Personal Data**

Our Members’ and Athlete Members’ details are held on a secure server called Hy-Tek Team Manager which is password-protected, controlled by one administrator and access is restricted to Club coaches, the President, Treasurer, the Meet Entry Secretary and the Club Administrator. Other Personal Data is held either in a locked filing cabinet in a locked office or on secure personal laptops of coaches or restricted personnel within the Club.

### **How long will we store your Personal Data?**

We will only keep your Personal Data for as long as necessary. How long we hold your Personal Data for will vary and will be determined by various criteria, including:

- the purpose for which we are using it – we will need to keep the Personal Data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Data.

## Your rights

Your rights in relations to your Personal Data are –

- You have a right to **access** the Personal Data which we hold about you by making a “subject access request”. If you would like to make a subject access request, please contact us as [wbcdataprotection@gmail.com](mailto:wbcdataprotection@gmail.com)
- If you believe that any of your Personal Data is inaccurate or incomplete, you have a right to request that we correct or complete your Personal Data;
- You have a right to request that we restrict the processing our your Personal Data for specific purposes;
- If you wish us to **delete** your Personal Data, you may request that we do so;
- If you have previously provided your consent to our use of your Personal Data and you wish to **withdraw such consent**, please contact [wbcdataprotection@gmail.com](mailto:wbcdataprotection@gmail.com). We may need to discuss with you whether our use of your Personal Data needs to continue for lawful purposes (i.e. because we have another legitimate reason (other than your consent) for doing so).
- Any requests should be addressed to the Club at [wbcdataprotection@gmail.com](mailto:wbcdataprotection@gmail.com) and will be considered under applicable data protection legislation. If you have any concerns or complaints in relation to how the Club collects and/or processes your Personal Data, you should contact the Club President at [jeremy.chittleburgh@chiene.co.uk](mailto:jeremy.chittleburgh@chiene.co.uk). If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at [www.ico.org.uk](http://www.ico.org.uk)

This Privacy Notice was last updated on 14 May 2018.