



# Data Privacy Notice

Updated September 2020

## What we need

Fins CSC will be a “controller” of the personal information that you provide to us in this form unless otherwise stated.

When you register as a member of Fins CSC or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following personal information of the member:

- name, address, contact email address, date of birth, allergies, medical conditions
- membership criteria / category – for example, athlete, parent, volunteer, etc.
- equality information – disability (if any)
- information, for PVG membership, related qualifications

## Why we need your personal information – contractual purposes

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 insurance, licensing and PVG checks;
- set up your online membership account and administer your account online
- send you membership communications by post or email in relation to essential membership services, including but not limited to, membership renewals, membership fees and information on membership benefits

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.

## Why we need your personal information – legitimate purposes

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. Competitions and events may be filmed or photographed and your personal information may also be used in images captured from the competitions and events, which may be used for promotional, education and development purposes;
- managing entries for competitions and checking your personal information to ensure you are entered into the correct category
- 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, and take disciplinary action.

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 [comms@finscsc.org](mailto:comms@finscsc.org). 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 information – legal obligations**

We are under a legal obligation to process certain personal information relating to our 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.

## **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**

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.

As an affiliated club of Scottish Amateur Swimming Association, we are required to ensure that all of our members are members of Scottish Amateur Swimming Association as a condition of our affiliation. We will share your name and membership category with Scottish Amateur Swimming Association who will become a controller of your personal information when they receive it.

## **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.

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

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 in the next renewal year.

## **Your rights**

You can exercise any of the following rights by writing to us at [comms@finscsc.org](mailto:comms@finscsc.org).

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 Fins CSC 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](http://www.ico.org.uk)

## **COVID-19**

As a result of the worldwide Coronavirus pandemic, we may need to record information regarding whether you are displaying any symptoms of COVID-19, have been in recent contact with anyone who has tested positive or is displaying symptoms of COVID-19, have any underlying health conditions or have, or are in close contact with anyone who has, been advised to shield. This information would be required to ensure the safety of members attending Fins CSC.

## **Why we need your data**

Our lawful basis for processing health information relating to COVID-19 is:

- to protect your vital interests; and/or
- for the legitimate interests of members attending Fins CSC to ensure individuals' safety and prevent the spread of the virus.

As health information falls within the definition of "special categories of personal data" under applicable data protection legislation, we also need a special condition to process such information. We may need to process this health information:

- to protect your vital interests where you cannot consent
- for reasons of public interest in the area of public health, including protecting against serious cross-border threats to health where we have a legal duty of confidentiality to you; and/or
- with your explicit consent (if required)

## **Information we may collect about you**

We may collect data from you in relation to COVID-19:

- From a return to water self-declaration and/or a regular health check survey – detailing whether you have symptoms of COVID-19, if you have come into contact with someone with COVID-19, history of having COVID-19, and underlying health conditions
- Should you report contracting COVID-19 through to the COVID Officer or Club Committee Member

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

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with public health obligations. 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.

Where a case of COVID-19 is recorded within the club, your personal information will not be shared with other members directly, however members will be advised that a case has occurred, whilst keeping personal information anonymous as far as possible.

## **How long will we store COVID-19 specific data**

We will only keep your personal information for as long as necessary in line with legal obligations – laws or regulation may set a minimum period for which we have to keep your personal information.