

Club Privacy Notice

Blairgowrie Dolphins ASC is a competitive swimming club and is affiliated to SASA Midland District and Scottish Swimming. **Blairgowrie Dolphins ASC** will be a “controller” of the personal information that you provide to us as a swimmer, parent / guardian of a swimmer, volunteer, technical official, committee member or representative of the club. You are required to pass your personal information to our sport’s governing body, Scottish Swimming via their online membership system, JustGo. In the case of technical officials, we may be required to pass your personal information to British Swimming.

Members personal data:

When you register as a member of **Blairgowrie Dolphins ASC** 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:

- name, address, email address, contact no., date of birth
- membership criteria / category – e.g. athlete, parent, volunteer
- payment details – bank account number and sort code
- participation details – e.g. athlete, parent, volunteer
- equality information – e.g. disability, ethnic group, religious beliefs, gender
- other personal information – e.g. emergency contact, medical info., PVG membership

Volunteers personal data:

When you volunteer with **Blairgowrie Dolphins ASC**, we will ask you for the following personal information:

- name, address, email address, contact no., date of birth
- participation details – e.g. parent, committee role, technical official
- equality information – e.g. disability, ethnic group, religious beliefs, gender
- other personal information – e.g. emergency contact, medical info., PVG membership

Why we need your personal information – contractual purposes

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 insurance, licensing, voting
- set up your online membership account
- send you membership communication emails in relation to essential membership services, general meeting notices, membership renewals, membership fees information, meet entries, events and general club updates

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.

Participants personal data:

When you book a place with us and attend a course, competition, event etc., we need to collect your personal information so that we can honour your booking and enable you to participate.

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

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 communication 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 SignUp Genius, Google entry forms, the Club's WhatsApp group chat and the club's Facebook page, inviting our members to participate in surveys for researching and development purposes
- invite our members as award winners or guests to our annual presentation night, which includes asking our members to nominate individuals for awards and shortlisting such individuals to select the winners, who may be contacted 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 wellbeing and 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. All relative policy documents are available to view on **Blairgowrie Dolphins ASC** website here: <https://blairgowriedolphins.co.uk/resources/>

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 blairdolphinsclubsecretary@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.

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 blairdolphinsclubsecretary@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 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
- our SportsScotland regulatory requirements
- 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 SASA Midland District and 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.

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.

Scottish Swimming members personal data

As a registered member / affiliated club of Scottish Swimming, we are required to ensure that all of our members are members of Scottish Swimming as a condition of our registration / membership / affiliation.

We will share personal details such as your name, address, date of birth 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 <https://scottishswimming.com/member-data-protection/>

Athletes / Participants personal data

We may publish the results of our competitions on our website or Facebook page. We would usually keep our swimmers identities anonymous. Only with prior permission from parents / guardians, would we include any names, ages, and results.

How we protect your personal information

Blairgowrie Dolphins ASC stores your personal information in the following:

- Club Google Drive account (password protected)
- Club Team Manager database (password protected)
- Scottish Swimming's JustGo online membership (on servers based in Europe)

All of the above are accessible by restricted Committee Members for the purposes set out above.

How long we keep your personal information

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 6 years.

We will keep certain personal information of members for longer in order to confirm your identity when you were a member of **Blairgowrie Dolphins ASC** and for how long.

Athletes personal data

We will mark an athlete as "inactive" within the Club's Team Manager database, which will archive any swimming results achieved at competitions and can be re-activated if an athlete returns to the club.

Your rights

You can exercise any of the following rights by contacting the Club Secretary on blairdolphinsclubsecretary@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
- if you wish us to delete your personal information, you may request that we do so

Any requests received by **Blairgowrie Dolphins ASC** 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