

**PERTH CITY SWIM CLUB (PCSC)
PRIVACY POLICY**

What we need

Perth City Swim Club is an affiliated member of the Scottish Amateur Swimming Association.

Perth City Swim Club will be a “controller” of the personal information that you provide to us in this form or through this website, etc. unless otherwise stated.

Members’ personal data:

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

- contact details - name, address, email address (for children under 16 this is the email address of a parent), contact telephone number, date of birth, gender, nationality, emergency contact & medical information
- membership criteria / category – for example, athlete, parent, volunteer
- participation details – for example, parent, athlete
- equality information – for example, disability, ethnicity, gender, sexual orientation

The above information is provided by you via Scottish Swimming online membership system (Azolve).

Volunteers’ personal data:

When you volunteer with Perth City Swim Club, we will ask you for the following personal information:

- contact details – name, address, email address, date of birth, telephone number
- participation details – for example, parent, committee
- equality information – for example, disability
- other personal information, for example, 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:



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- provide you with core member services, including key service purposes, for example, insurance, licensing, voting, etc.
- if applicable, assist with set up your online membership account
- send you membership communications by post or 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.

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 event.

If you do not provide us with all the personal information that we need to collect, then this make 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' 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 attendance registers and inviting our members to participate in surveys for researching and development purposes.
- invite our members as award winners or guests to annual awards ceremony, 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



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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 re complaints and disciplinary procedures, for example, we will use your personal information to investigate your complaint, to suspend membership, take disciplinary action, etc.

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 secretary@perthcityswimclub.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 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 secretary@perthcityswimclub.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:

- to perform and manage our membership contact with you.
- to comply with our obligations under Companies Act 2006, sportscotland regulatory requirements, the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary



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- to protect your vital interests
- with your consent (in limited circumstances); or
- our legitimate interests – while you have a legitimate interest in the protection of your personal information, we also have an overriding legitimate interest in handling and using your personal information, for example, to ensure the effective functioning of our organisation and Club.

Other uses of your personal information

We may ask you if we can process your personal information for additional purposes in the future. 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 Perth City Swim club social media and website, Live Active Leisure, Perth Advertiser (and local press), Midlands District, Scottish Swimming, club sponsors etc. 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.

If 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.

SGB members' personal data

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

We will share membership information, results and ranking with Scottish Swimming who will become a controller of your personal information when they receive it.



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S.A.S.A privacy notice explains how they use your personal information and can be accessed @ www.scottishswimming.com

Athletes' / Participants' personal data

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

PCSC collects and process through the TeamUnify platform the following personal information about swimmers and their parents / guardians:

- Athlete / swimmer name, date of birth, gender, sportswear size and other measurements, GP name and contact details, medical information (if relevant and with parental consent), information about club membership and membership in sports bodies and associations, ability group, attendance history, competition results, medical insurance information if applicable, emergency contact, videos, photos, and additional comments, note or information about an athlete submitted by any End User.
- Parent / legal guardian name, date of birth and contact details such as address, email, and phone number.
- Billing information and payment details such as credit card and purchase history.
- Videos and photos
- Athlete / swimmer meet results
- SASA registration data for swimmers and non-swim members
- Background and criminal record checks for club members with consent

How does PCSC use swimmer and parent / legal guardian personal data?

PCSC uses this information for the following purposes:

- To operate the club and allow swimmers and their parents / guardians to register for and attend swim meets, sign up for jobs, access swim time histories and swimming practice photos and videos, practice management, for event management, communication, billing and collection of fees and other services they request.
- For internal club record keeping



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- To comply with national and regional sports bodies – Midlands District, Swim Scotland, Scottish Swimming registration and membership requirements.

Does PCSC share your personal information with third parties?

PCSC will not share personal information without consent except:

- Where it is necessary with a service provider such as Team Unify or SportsEngine (TeamUnify's parent company), in order to provide members, their parents and coaches with services they have requested (e.g. to register for and attend swim meets, sign up for jobs, access swim time histories and swimming practice photos and videos), for practice management, communication, billing and collection of fees and other services requested.
- Where PCSC has a legal obligation to disclose the information (such as responding to a court order), to protect PCSC's legal rights or to prevent fraud or illegal activity.



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How we protect your personal information

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

We are required to transfer your personal information out-with the EU for the purposes of entering athletes into competitions, booking travel arrangements for training camps, etc. Where your personal information is transferred out-with 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

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 1 year.

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

Athletes' personal data

We keep our athletes' personal information for 12 months.

Club update April 2021, Covid-19 update

As a result of the worldwide Coronavirus pandemic, we may need to record information regarding whether you are displaying from 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 Perth City Swim Club.

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 Perth City Swim Club to ensure individuals' safety and prevent the spread of the virus.



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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.



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Your rights

You can exercise any of the following rights by writing to us at secretary@perthcityswimclub.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 Perth City Swim 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

