

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you have registered to become or are currently a member of our club. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **WE, OUR** or **US** in this privacy notice are to **Dewsbury Amateur Swimming Club CLG** also known as **Dewsbury Dolphins**.

We have not appointed a named Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but Gillian Johnson on behalf of a Data Protection Compliance Manager has overall responsibility for data protection compliance in our club/organisation. Contact details are set out in the '**Contacting us**' section at the end of this Privacy Notice.

### **1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain personal information about you, such as information regarding your:

- Personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- Date of birth;
- Gender;
- Membership start and end date;
- References of your interactions with us such as telephone conversations, email and other correspondence and your instructions to us;
- Records of your attendance at regular training sessions and any events hosted by us or other sports clubs when representing us;
- Images in video and/or photographic form and voice recordings;
- Identification documents such as passport etc.;
- Details of next of kin, family members and emergency contacts;
- Records and assessment of any swimmer ranking, grading or rating, competition results, details regarding (events) attended and performance;
- Any disciplinary and grievance information.

### **2. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following 'Special Categories' of more sensitive personal information regarding you:

- Information about your health, including any medical conditions, health and sickness records, medical records and health professional information.

We may not collect all of the above Special Category personal information about you. In relation to the special category personal data that we do process we do so on the basis that:

- The processing is necessary for reasons of substantial public interest, on a lawful basis;
- It is necessary for the establishment, exercise or defence of legal claims;
- It is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or;
- Based on your explicit consent.

In the table following we refer to these as ‘special category reasons for the processing of your personal data’.

We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

**3. WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members when you apply to become a member of the club, you register your details when you complete a membership form and make payment for your annual and/or weekly membership fees. We also collect information when you make a query and/or complaint or when you correspond with us by telephone, email or in some other way i.e. through a social media messenger page.

We may also collect personal information about you from any third party references you provide as part of the application process for membership.

If you are providing us with these details of referees, next of kin, family members and emergency contacts, they have a right to know what personal information we hold on them and how we collect or may share it. Please ensure you share this Privacy Notice with those of whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the ‘**Your rights in relation to personal information**’ section below.

**4. USES MADE OF THE INFORMATION**

The table below describes the main purposes for which your personal information, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose</b>	<b>Personal Information Used</b>	<b>Lawful Basis</b>
<b>To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support or service enquiries made by you</b>	All contact and membership details, transaction and payment information and records of your interactions with us.	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To arrange and manage any contracts for the provision of any services or products</b>	Contact details, transaction and payment information. Records of your interactions with us.	This is necessary to enable us to properly administer and perform any services and products you have purchased from us.
<b>To send you information which is included within your membership including details about competitions, galas and any updates on swimming.</b>	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To send you marketing information relating to our club including any newsletters, information about memberships, events and products</b>	Contact details and marketing preferences.	Where you have given us your explicit consent to do so.
<b>To answer your queries or complaints</b>	Contact details and records of your interactions with us.	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership – this may include involving a third party such as a governing body who will provide guidance and support to the club however this is on a confidential basis.

<b>Retention of records</b>	All the personal information we collect.	<p>We have legitimate interest in retaining records whilst they may be required in relation to complaints. We need to retain records in order to properly administer and manage your membership and run our club and in some cases we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the 'special category reasons for the processing of your personal data' referred to in section 2.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<b>For the purposes of promoting the club, our events and membership packages.</b>	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
<b>To comply with health and safety requirements</b>	Records of attendance, medical information about your health.	<p>We have a legal obligation and a legitimate interest to provide you and other members of our club/organisation with a safe environment in which to participate in sport.</p> <p>We process special category personal data on the basis of the 'special category reasons for the processing of your personal data' referred to in section 2.</p>
<b>To administer your attendance to weekly training sessions and any programmes/courses or competitions/galas you sign up to</b>	All contact and membership details, transactions and payment data.	This is necessary to enable us to register you on to and properly manage and administer your attendance at weekly training sessions and any programmes/courses or competitions/galas.
<b>To arrange for any trip or transportation to or from an event</b>	Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.</p> <p>We process special category personal data on the basis of the 'special category reasons for the processing of your personal data' referred to in section 2.</p>
<b>To use information about your physical or mental health (including injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host.</b>	Health and medical information	We process special category personal data on the basis of the 'special category reasons for the processing of your personal data' referred to in section 2.
<b>To gather evidence for possible grievance or disciplinary hearings</b>	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the

		<p>effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data on the basis of the 'special category reasons for the processing of your personal data' referred to in section 2.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<b>For the purposes of equal opportunities monitoring</b>	Name, title, date of birth, gender, information about your race or ethnicity and health and medical information	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</p> <p>We process special category personal data on the basis of the 'special category reasons for the processing of your personal data' referred to in section 2.</p>
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b>	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do so by contacting us as described in the 'Contacting us' section.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on the bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to offer you a membership.

**5. DIRECT MARKETING**

Email, phone, post and SMS marketing: We will not contact you through by post, telephone or SMS for marketing purposes. All events and product promotion will be done through the members facebook page, on our club website or by email to you providing you have given consent to do so. If a member does not attend training sessions for a period of 4 weeks a committee member will contact the member by phone or email to discuss if there is a problem the club need to be aware about or to confirm the member no longer wishes to be

a member of the club. If the club are unable to contact you following 3 months of none attendance the member will have their membership cancelled without further notice.

## **6. DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties

- Any party approved by you
- To any governing bodies or regional bodies for the sports covered by our club (swimming) to allow them to administer the sports on a local, regional and national level.
- The government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives.
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

## **7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

We will take all reasonable steps to ensure that your personal information is only used in accordance with this Privacy Notice and application data protection laws and is respected and kept secure and where a third part processes your data on our behalf we will put in place appropriate safe guards as required under data protection laws. For further details please contact us by using the details set out in the 'Contacting us' section.

## **8. HOW LONG DO WE KEEP PERSONAL INFORMATION?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practise and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months;
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those type of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can contact us using the details set out in the 'Contact us' section.

## **9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- The right to be informed about how your personal information is being used;
- The right to access the personal information we hold about you;

- The right to request the correction of inaccurate personal information we hold about you;
- The right to request the erasure of your personal information in certain limited circumstances;
- The right to restrict processing of your personal information where certain requirements are met;
- The right to object to the processing of your personal information;
- The right to request that we transfer elements of your data either to you or another service provider; and
- The right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this Privacy Notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioners website at <http://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the 'Contacting us' section.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

#### **10. CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

#### **11. CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [info@dolphins-asc.co.uk](mailto:info@dolphins-asc.co.uk) or write to us at

**Registered office: Dewsbury Amateur Swimming Club CLG c/o Harrison  
Blakeley Accountancy Limited, 21 Church Street, Horbury, WF4 6LT**