



## TAVISTOCK SWIMMING CLUB

Established 1990

### Privacy Policy

#### **Introduction**

1. Welcome to Tavistock Swimming Club's ("TSC's") privacy document. It aims to give you information on how we collect and process your personal data and to outline your rights. It applies to everyone involved with TSC: swimmers, parents/ guardians, volunteers and coaches.
2. The TSC trustees (often described as the club committee) are the people responsible for looking after your personal data. If you have any questions about this privacy policy, please ask any of them or contact us on [tavistockswimmingclub@gmail.com](mailto:tavistockswimmingclub@gmail.com)
3. The TSC website includes links to third-party websites. Clicking on those links may allow third parties to collect or share data about you. We do not control those third-party websites and are not responsible for their privacy statements.

#### **Your personal data**

4. "Personal data" means any information about an individual from which that person can be identified. You might also come across the expression "personal information". This has the same meaning. "Processing" covers just about everything which can be done with data, from merely recording it to analysing it and sharing it with other people. In this document, the word "use" is often used instead of "process".

#### **What personal data do we collect about you and how do we use it?**

5. A table setting out what personal data we collect and/or process, what we use it for, our legal basis for having and using it, and how long we keep it is attached. The processing is done either by individuals (trustees, coaches or volunteers) or via Club Organiser.

#### **Sharing data with third parties**

6. TSC shares your personal information with:
  - (1) Club Organiser and Wordpress;



- (2) Swim England;
- (3) Club coaches and volunteers;
- (4) Other club members;
- (5) Professional advisers, including the person who examines the TSC accounts;
- (6) HMRC;
- (7) Facebook, if have given consent;
- (8) The general public (eg. in a newspaper article), if you have given consent.

We will also share your information if we have a legal obligation to do so (eg. in response to a Court order); to protect TSC's or a trustee's or coach's legal rights; to prevent fraud or illegal activity; or to prevent harm to a child or vulnerable person. Please also note that if you leave the club while owing us money, we are obliged to inform Swim England.

7. That doesn't mean all your personal information is shared with all of those people. We only share information when it is the best, or the most convenient, way of carrying out the purposes described in the table. For example:
  - (1) The coaches, and team managers at any gala you swim in, have access to your medical information because they might need it to look after you. Other people on that list do not.
  - (2) Other club members can see the results of test sets, because these are written down and put on the inside of the shed door so the swimmers can remind themselves of their own results. But they don't see any other information, such as contact or payment details.
  - (3) The most which is shared in a public forum is your name, photograph, age group and achievement.

#### **For how long will you use/ keep my personal data?**

8. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or accounting requirements. More details are given in the table, but:
  - (1) By law we have to keep basic information about our paying members for six years after they have left.
  - (2) We delete your medical information immediately you leave the club.
  - (3) We keep the information you have given us on your membership form and via Club



Organiser for approximately 12 months after you have left the club. This helps with running the club and saves time if you rejoin.

(4) We keep your name and practice/ competition results for about five years after you have left the club, because experience has shown us that many people return within that time.

(5) If you set a club record in a particular distance/ age-group, we keep that information until your record is beaten.

9. If you would like information deleted sooner than is set out in the table, please feel free to contact us. We will be happy to help where we reasonably can. In addition, in some circumstances you have a legal right to ask us to delete your personal data: see below.

#### Your legal rights

10. You have the following rights regarding your data.

(1) The right to be informed about the collection and use of your personal information.

This document is intended to do that.

(2) The right to have a copy of your personal data (“a subject access request”).

(3) The right to have inaccurate or incomplete personal data corrected or completed.

(4) The right to have it erased, if there is no good reason for us to continue to hold it.

(5) The right to withdraw consent at any time when we are relying on your consent to hold or to use your data.

(6) In some circumstances, the right to ask us to suspend processing of it – ie. to stop doing anything with it, while still holding it. This is most likely to arise as an interim measure, such as if you have asked to exercise one of your other rights and there is a delay while we consider your request.

(7) The right to have a computer-readable copy of any data which you have given us and we have on Club Organiser or another computer program (“the right to data portability”).

(8) In some circumstances, the right to object to us using your data. You have an absolute right to stop us using your data for direct marketing. You also have a qualified right to stop us using your data where we are relying on “legitimate interest” as our legal grounds (see the table).

11. If you would like more information about any of those rights, please ask us.

Alternatively, you will find details and explanations on the website of the Information



Commissioner's Office ("the ICO"), the UK supervisory authority for data protection issues: [www.ico.org.uk](http://www.ico.org.uk).

12. If you wish to exercise any of your rights, please contact any of the club trustees, orally or in writing, or email us on [tavistockswimmingclub@gmail.com](mailto:tavistockswimmingclub@gmail.com). You will not have to pay a fee unless your request is clearly unfounded, repetitive or excessive or you are asking for multiple copies of your data.
13. We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Complaints**

14. If you have a concern about the way we are handling your personal data, please raise it with us first. If you aren't happy with our response, you can then ask the ICO to help. You should do this within three months of getting our response. You can contact them via their website or by calling their helpline on 0303 123 1113.



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**Schedule of personal data handling**

What information	Why we hold/ use it and on what legal basis	How long we hold it
Information from your membership form and which you input into Club Organiser – e.g. name, DOB, gender, contact details, emergency contact, membership of other clubs	To run the club and to enable you/ your child to participate fully in club activities. <b>Legal basis:</b> contract	Name, DOB, gender: up to six years after you have left the club. Other info: about one year after you have left the club.
Swim England registration details	To administer your membership of Swim England and to comply with Swim England’s registration requirements. <b>Legal basis:</b> contract	Registration number: about 5 years after you have left the club. Other info: for as long as you remain a member of Swim England.
Relevant medical information which you give us	To look after your welfare during training and competition. <b>Legal basis:</b> consent	While you are a member of the club only.
Photos & videos.	For training purposes. To advertise the club. As part of the club’s historical records. <b>Legal basis:</b> consent.	Videos: only for as long as they are needed for coaching you. Photos: these may be kept indefinitely, for historical interest.



What information	Why we hold/ use it and on what legal basis	How long we hold it
Training info: squad & squad history, attendance, practice or set results and feedback	To plan and deliver coaching. <b>Legal basis:</b> contract	For about five years after you have left the club (because it is useful if you return to the club).
Competition info: qualifications and results	For internal club records and to market the club. <b>Legal basis:</b> legitimate interest.	Indefinitely, as a part of the club's records.
Information about other achievements – eg. names of club captains	For internal club records and to market the club. <b>Legal basis:</b> legitimate interest.	Indefinitely, as a part of the club's records.
Information given to the welfare officer	In case further issues arise and to ensure a smooth transfer if the welfare officer changes. <b>Legal basis:</b> contract; legitimate interest	In most cases, about three years after you have left the club. Matters which could give rise to criminal proceedings, up to 10 years or until all parties are over 25 (whichever is the later).
Other info you give us, incl. survey responses, preferences, feedback	To run the club and to enable you/ your child to get as much as possible out of club activities. To improve the club. <b>Legal basis:</b> contract; legitimate interest (making the club as good as possible).	Up to six years after you have left the club. Info which become incorporated in club records – eg. in minutes for trustee meetings – indefinitely.
Billing information and payment details. Bank details, if we have given you a refund at any point.	To run the club and allow you/ your child to enter galas.	While you/ your child(ren) are a member of the club.



What information	Why we hold/ use it and on what legal basis	How long we hold it
Details of financial transactions, including correspondence	To run the club and to comply with our legal obligations to HMRC and the Charity Commission. <b>Legal basis:</b> contract and legal obligation	Until six years after you/ your child(ren) have left the club.
History of kit orders; sportswear preferences and sizes	To fulfil your orders, to make further orders easier and to plan what kit to supply. <b>Legal basis:</b> contract (fulfilling your orders); legitimate interest (keeping a record of kit orders helps us decide what kit to offer; keeping your preferences and sizes makes repeat orders more convenient).	Transactions: six years after you leave the club.  Sizes and preferences: about a year after you leave the club.
Qualifications and courses attended	To ensure all coaches and volunteers are adequately qualified. To identify further training requirements. <b>Legal basis:</b> contract (for paid coaches); legitimate interest (we cannot run or participate in galas without a supply of adequately trained volunteers).	Coaches: six years after you left the club.  Volunteers: about a year after you have left the club.  Officials: about six years after you left the club
Criminal record and background checks	To protect children and vulnerable club members and to comply with Swim England’s safeguarding requirements. <b>Legal basis:</b> consent.	Up to three years after you have left the club.



What information	Why we hold/ use it and on what legal basis	How long we hold it
Sessions coached	To work out what we owe you and to plan further coaching. <b>Legal basis:</b> contract; legitimate interest (planning further coaching)	Six years after you have left the club.
Volunteering record	Keeping a record of events and how they were run helps us with planning and running future events. <b>Legal basis:</b> legitimate interest.	About 10 years after the event.
IP address on registrations (alongside your name and age at the date of registration)	This allows your completing of forms online to act as a signature. <b>Legal basis:</b> contract.	As a minimum, for six years (or, if later, six years after you have turned 18). This is in case we need to use the information in legal proceedings.
Gift Aid information	To claim gift aid from HMRC. <b>Legal basis:</b> contract; legal obligation	Six years after you have left the club.