



Torridgeside Amateur Swimming Club Privacy Policy

Privacy notice for our members & volunteers

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 or volunteering with us. This notice applies to you if you have registered to become or are a member of, or volunteer with, 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 the Torridgeside Amateur Swimming Club ("TASC"), Registered Charity number 1103701.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so. 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

Personal information means any information about you by which you can be identified.

As a club we are required to collect, use, store and transfer some personal data of our participants and their parents or guardians, and other Club members including but not limited to Club coaches, teachers, officials and volunteers.

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 allow us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership/volunteering start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, usernames and other IT system identifying information;
- records of your attendance at any training and events hosted by us;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you;
- identification documents such as passport and identity cards;
- details of emergency contacts;



- records and assessment of any swimmer competition results, details regarding events attended and performance;
- any disciplinary and grievance information.

Any personal data we ask you for will be for no other purpose than to fulfil Club responsibilities.

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 race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and

We may not collect all of the above types of 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 below we refer to these as the “special category reasons for 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/volunteers when you apply to become a member of or volunteer at the club, you register an account with us at www.torringside.swimmanager.co.uk, when you purchase any services or products we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are providing us with details of family members and emergency contacts, they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them 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 we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose/ Processing Activity	Personal information used	Lawful Basis for processing under Article 6 of the GDPR
Administration of membership and volunteer roles including forms, payments and support	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
Making a decision about your appointment as a volunteer and managing the appointment process	All the personal information we collect from you as part of the application process. Records of volunteering history. Referee details and any references.	We need this information to be able to perform and administer your contract with us as a volunteer.
To send you information which is included within your membership benefits package or volunteer role, including details about competitions, social events and any updates on swimming and club matters	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract or volunteering role with us.
To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters	Contact details and marketing preferences.	We will send our members and volunteers any information we feel may be useful or of interest, unless you have specifically requested that we do not do so.
To answer your queries or complaints	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.
Sharing data with coaches, team managers or officials to run training sessions or enter events	All contact and membership details, medical information,	This is necessary to enable us to properly manage and administer your membership contract with us.



	transaction and payment data.	
Sharing data with Swim England and county associations and other competition providers for entry to events/competitions	Membership details. Disability information if required for para entries.	This is necessary to enable us to properly manage and administer your membership contract with us.
Sharing data with third party service or facility providers.	Contact details, transaction and payment information. Records of your interactions with us.	The Club has a responsibility to run the organisation efficiently. Provision of some third-party services is for the benefit of the Club, participants, and its members.
Publication of results eg: gala's, club championships	Social media, Spond & website – first name details, photographic and video images, race results. For club records full name would be published on TASC website while record is held.	We will only publish your personal data in a public domain, including images and names, where appropriate, provided we have your consent for us to do so. In the case of children under the age of 18 then only with the consent of a parent/guardian.
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities	Health and medical information.	We will only process details on your medical history with your consent.
Retention of records	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. 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>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
For the purposes of promoting the club, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements	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 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 processing of your personal data” referred to in section 2 above.</p>
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences, identification documents	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
For the purposes of equal opportunities monitoring	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 processing of your personal data” referred to in section 2 above.</p>



To gather evidence for possible grievance or disciplinary hearings	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 effective management of any disciplinary hearings, appeals and adjudications. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
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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/volunteer 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/position as a volunteer. 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/arrangements with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below. For members & volunteers under 18 then consent will be obtained from the parent/guardian.

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 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 provide certain member/volunteer benefits to you.

5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We may at times share your information with third parties for registration purposes, for example for competition entry, officiating at competitions and specifically, but not limited to Swim England (including at local, regional and national level), or other swimming clubs hosting Open Meets.



We may disclose your personal information to meet our legal and regulatory obligations, which may include reporting under the Swim England's Wavepower Child safeguarding policy and procedures.

We may also disclose your personal information to third parties to comply with a legal obligation; to protect the rights, property, or safety of our participants, members or affiliates, or others.

We may disclose your information to service providers, for example payment processors and IT services as required for the administration of the club.

6. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

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 practice 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/last volunteering date. 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 types 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;
- We will keep individual performance records forming Club's competitive records with the permission of that individual and only for as long as that record is held.

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 may be able to update some of the personal information we hold about you through Swim Manager. Alternatively, you can contact us by using the details set out in the "Contacting us" section below.

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 Commissioner's website at <https://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 below.

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 way, 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 the Club Chair at chair@torridgesideswimming.co.uk

Version dated 15 October 2024