

**Rushmoor Synchronised Swimming Club (RSSC)**  
**PRIVACY NOTICE FOR MEMBERS**

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 privacy notice sets out on behalf of members and other Club users what personal data RSSC processes, collects, stores and uses, why it does so and for how long it retains it. It summarises the rights of individuals with regard to their personal information which the Club holds and gives a clear commitment of the Club's adherence to all laws and regulations, relevant to the processing of personal data

References to **we**, **our** or **us** in this privacy notice are to the **Rushmoor Synchronised Swimming Club (RSSC)**

**1. WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members when you apply to become a member of the club. Over the course of your membership we may collect

- 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;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- records of your attendance at any events hosted by us;
- images in video and/or photographic form and voice recordings;
- details of any county or SwimEngland membership;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any competition results, details regarding events attended and performance (including that generated through England Talent programme);
- 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 condition, health and sickness records, medical records and health professional information; and

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 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”.

### 3. 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	Personal information used	Lawful basis
<b>To administer any membership you have with us and managing our relationship with you, including dealing with payments and any service (eg competitions)</b>	All contact and membership details, transaction and payment information, records of your interactions with us,	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To send you information which is included within your membership, including details about competitions and events,</b>	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
<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.
<b>Retention of records</b>	All the personal information we collect.	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.  We process special category personal data on the basis of the “special category reasons for processing of your personal data”..
<b>For the purposes of promoting the club, our events and membership.</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	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.  We process special category personal data on the basis of the “special category reasons for processing of your personal data”.
<b>To administer your attendance at any courses or competitions you sign up to</b>	All contact and membership details, transaction and payment data.  Details of any SwimEngland membership and performance data.	This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or competitions.
<b>To arrange for any trip or transportation to and from an event</b>	Identification documents details of next of kin, family members and	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.

	emergency contacts, transaction and payment information, health and medical information.	We process special category personal data on the basis of the “special category reasons for processing of your personal data”.
<b>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.</b>	Health and medical information	We process special category personal data on the basis of the “special category reasons for processing of your personal data”
<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 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”..
<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 DBS applications.	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 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.

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 benefits to you.

#### 4. **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:** to allow them to properly administer the sports on a local, regional and national level.

## 5. **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. 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.

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 by using the details set out in the "**Contacting us**" section below.

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

Under certain circumstances, by law you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it. You can also withdraw your consent, where this is the basis for our processing your data (without affecting the lawfulness of our previous processing based on consent).
- Request the transfer of your personal data to another party.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

## 7. **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.

## 8. **CONTACTING US**

If you have any queries about this privacy policy or how we process your personal data, or if you wish to exercise any of your legal rights, you may contact the current Club Secretary or any current Club Committee Official.

**Version dated 2<sup>nd</sup> June 2018**