

The logo for Cumbernauld Swimming Club is a yellow oval with a blue border. Inside the oval, the text "CUMBERNAULD" is written in bold black uppercase letters on the top line, and "Swimming Club" is written in black lowercase letters on the bottom line.

**CUMBERNAULD**  
Swimming Club

# MEMBERS PRIVACY NOTICE

Cumbernauld Swimming Club

Version 0.1  
27th April 2018

## What we need

Cumbernauld Swimming Club, hereby referred to as CASC, will be a “controller” of any personal information that you provide to us in any or all forms, unless otherwise stated.

When you register as a member of CASC or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following information:

- Personal details – Name, address, and date of birth;
- contact details -day/evening telephone numbers, mobile number, and email address;
- Emergency information – contact information, doctors information;
- membership criteria / category – athlete, parent, volunteer;
- equality information – disability (if any), ethnic group, religious belief, gender identity and sexual orientation.

## Why we need your personal information – contractual purposes

We need to collect our members’ personal information so that we can manage your membership. We will use our members’ personal information to:

- set up your CASC membership and SASA registration;

- send you membership communications by post or email in relation to essential membership services, including but not limited to, membership renewals.

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.

## Why we need your personal information – legitimate purposes

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 entry 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;
- develop and maintain our members’ qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any

mandatory training and PVG / child protection requirements; and

- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to swimming or CASC. We will use your personal information to investigate your complaint, suspend membership and take disciplinary action where appropriate.

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 us on [cumbernauldswim@yahoo.com](mailto:cumbernauldswim@yahoo.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.

## Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to our members for the purposes of complying with our obligations under the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults.

## Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. 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

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.

As an affiliated club of Scottish Swimming we are required to ensure that all of our members are members of Scottish Swimming as a condition of affiliation. We will share your name and membership category with Scottish Swimming who will become a controller of your personal information when they receive it.

Scottish Swimming's privacy notice explains how they use your personal information and

can be accessed here [www.scottishswimming.com/membership/data-protection.aspx](http://www.scottishswimming.com/membership/data-protection.aspx).

We may be required to share personal information with other affiliated swimming clubs and governing bodies to ensure entries and registrations are correct. Where this is the case we will share the minimum amount of information necessary for the specific purpose.

In the event that 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.

## How we protect your personal information

Your personal information is stored on our electronic filing system as well as our servers based in the UK. Where UK based data solutions are not an option all data is held on servers compliant with US/EU privacy shield. All this data is accessed only by our staff and volunteers that are required to do so. All data held by CASC and the practices in place to store and use this data are reviewed by an internal data protection officer.

## How long we keep your personal information

In line with Principle 5 of the Data Protection Act 1998, CASC

will not retain your personal data for longer than necessary to fulfil the purpose for which it was obtained.

As the controller of your personal information CASC will regularly:


- review the length of time we keep your personal data;
- consider the purpose or purposes we hold the information for in deciding whether (and for how long) to retain it;
- securely delete information that is no longer needed for this purpose or these purposes;
- annually review data held to ensure it is always accurate and correct; and
- update, archive or securely delete information if it goes out of date.

## Your rights

You can exercise any of the following rights by writing to us at [cumbernauldswim@yahoo.com](mailto:cumbernauldswim@yahoo.com).

Your rights in relation to your personal information are:

- a right to request a copy of any personal data held relating to you;
- a right to object to processing that is likely to cause or is causing damage or distress;

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- a right to prevent processing for direct marketing;
  - a right to object to decisions being taken by automated means;
  - a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed;
  - a right to claim compensation for damages caused by a breach of the Act; and
  - Any requests received by CASC 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](http://www.ico.org.uk)