



BOOTLE AND NORTH LIVERPOOL SWIMMING CLUB

GENERAL DATA PROTECTION REGULATIONS (GDPR)

PRIVACY POLICY

The new General Data Protection Regulations came into effect on 25th May 2018. The new regulations enhance the rights of individuals and introduce a number of additional obligations on all organisations. The new regulations require **Bootle and North Liverpool** to have the consent of organisations and individuals to use their data and to be open and honest with their members regarding the data that is processed, what the data is to be used for and how the data is to be stored.

Bootle and North Liverpool now seeks the consent of individuals and organisations where appropriate to collect process and store the necessary data for-

- 1) Every club member in order to establish the contact details of each individual, telephone numbers, email addresses and category of Swim England membership.
- 2) Name.
- 3) Date of Birth.
- 4) Gender.
- 5) Details Of next of kin, family members, coaches and emergency contact details.
- 6) Membership start and end date
- 7) Each individual entry into a club swimming competition to establish the demands of the competition
- 8) Records of your interactions with us such as telephone conversations, emails, and other correspondence and your instructions to us.
- 9) Records of your attendance at any events hosted by us, training sessions, club galas, courses,
- 10) Your marketing preferences so we know whether or how we can contact you.
- 11) Any credit/debit card details you provide so that we can receive payments from you.
- 12) Records and assessment of any swimmer rankings, competition results, details regarding galas attended and performance.
- 13) Identification documents, such as a passport
- 14) Information about your health, including any medical conditions.
- 15) Images in video and/or photographic form.

We may not collect all of the above types of personal information about you.

Some of the data we 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;
- Based on your explicit consent

Bootle and North Liverpool has created this document in order to inform its individual members, coaches and volunteers where necessary of the need for and the processes required for the collection and processing of their data.

References to we, our or us in this privacy notice are to **Bootle and North Liverpool**.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but the committee members have overall responsibility for data protection compliance in the club. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

Section 1 Personal Data

Section 1 relates to the Membership Form filled in when joining the club. Your consent to Section 1 is necessary to enable your membership of **Bootle and North Liverpool** to be considered, approved, retained or renewed. If you are providing us with details of next of kin, family members and emergency contacts they have a right to know and 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.

1.1 Mandatory consent – Applying for membership

As an applicant for membership of **Bootle and North Liverpool** you consent to the processing, retention and sharing of your personal data as submitted with your application/ renewal. This is necessary to enable us to manage and administer your membership contract with us.

You can withdraw your consent and request erasure of your data at any time by contacting the membership secretary

1.2 Special Categories of Personal Data

Special categories of personal data may also be collected, stored and used including

- Information about your health, including any medical condition and disability status.

In the table below, we refer to this as the "special category reasons for processing of your personal data".

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

1.3 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 the lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer any membership account(s) you have with us and managing our relationship with you, including dealing with payments and enquiries made by you	All contact details, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your account with us.
To send you information we think you might find useful or which you have requested from us, including information about competitions and galas, our events, presentation evening.	Contact and membership details	Where you have given us your explicit consent to do so
To deal with 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 the service we provide.
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 any account you have with us 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” referred to in section 1.2 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To conduct data analytics studies to better understand event attendance and trends within the Club	Records of your attendance at any events or competitions hosted by us and/or our delivery partners.	We have a legitimate interest in doing so to ensure that our events continue to improve and are targeted and relevant.
For the purposes of promoting Bootle and North Liverpool Swimming Club	Images in video and/or photographic form.	Where you have given us your explicit consent to do so. [Child Photography Consent Form]

To comply with health and safety requirements	Records of attendance and health and medical information	We have a legal obligation and a legitimate interest to provide you and other members of our Club 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” referred to in section 1.2 above.
To use information about your physical health (including any injuries) or disability status to ensure your health and safety and to assess your fitness to participate in any of the activities or events we host	Health information	We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 1.2 above.
For the purposes of equal opportunities monitoring	Name, title, date of birth, gender, information about your race or ethnicity, and health information.	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 1.2 above.
To administer your attendance at any courses, events or programmes you sign up to	All contact details, date of birth, gender, health and medical information and payment record	This is necessary to enable us to register you on to and arrange for the effective delivery of our development programmes and galas. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 1.2 above.
To comply with legal obligations, for example, regarding people working with children	Information about your criminal convictions and offences if Any	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To arrange for any transport to galas or to other Club events arranged as a Club.	Details of next of kin, family members and emergency contacts, transaction and payment information, and medical information	This information is required to make arrangements for a gala or an event. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 1.2 above.

1.4 General Considerations

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 of **Bootle and North Liverpool** 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 of **Bootle and**

North Liverpool. 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 consent has been given 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 members benefits to you.

Section 2. No consent required – Use of your data

1. On resignation or expulsion from membership, maintaining records to prevent you from improperly re-applying for membership;
2. Maintaining records of positions held in **Bootle and North Liverpool** or competitions won for administrative, archive and historical purposes.
3. Providing as required the minutes of General, Annual or Monthly Club meetings or other Meetings as required
4. Recording your performance where necessary and as required by the rules of a competition.

A member may stop their data from being used for all purposes except 1 and 2 above by resigning their membership of **Bootle and North Liverpool** or from membership of Swim England. If you resign or are expelled, personal data relating to your membership will normally be retained and processed by **Bootle and North Liverpool** for 1 year. If you wish to object to the processing of your data for purposes 1 then please contact any committee member.

A member may request access to the data held about them by **Bootle and North Liverpool**, and ask for rectification of that data, if necessary, by submitting a request to the Membership Secretary. The legal bases on which any personal data will be used in accordance with Section 2 are The legitimate interests and safe management of **Bootle and North Liverpool**

Section 3. Direct Marketing

We do not pass on your personal information to 3rd parties for the purposes of direct marketing

Section 4. Disclosure of your PERSONAL information

Personal information is shared with the following parties:

- **Any party approved by you;** Membership Secretary, Head Coach, Coaches, Teachers, Team Managers, Welfare Officer and Committee members.
- **To any governing bodies or regional bodies for the sports covered by us:** including **Swim England** to allow them to properly administer swimming on a local, regional and national level.
- **Other service providers and advisors:** for example, payment processors,
- **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.

Bootle and North Liverpool does not disclose personal information to anyone else except as set out above.

Section 5. 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

Section 6. Retention of Personal Information

The duration for which personal information is retained will differ depending on the type of information and the reason why it is collected 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 you terminate your membership.

Exceptions to this rule are:

- Information that may be relevant to personal injury claims, 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.
- Details regarding unsuccessful membership application where we hold records for a period of not more than 12 months.

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. Your updated personal details should be passed on to the Membership Secretary.

Section 7. 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 held about you;
- the right to request the correction of inaccurate personal information held 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 refuse consent to child photography or withdraw your consent at any time
- the right to request the transfer of elements of your data either to you or another service provider;
- 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.

Section 8. Changes to this Notice

This privacy notice may be updated from time to time. When a change to this notice is made in a material way, the version date at the bottom of this page will be updated. For significant changes to this notice reasonable notice will be given 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.

Section 9 Contacting Us

In the event of any query or complaint in connection with the information we hold about you, please email bnlsc@outlook.com