

## Privacy Policy

Leicester Penguins Swimming Club (LPSC) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you become a club member and tell you about your privacy rights and how the law protects you.

In this privacy policy we explain how we collect and use your personal information for the purposes of the General Data Protection Regulations 2018. This policy should be read in conjunction with the "Swim England Privacy Policy" which is available on the Swim England (SE) website at: [www.swimming.org/library/documents/2479/download](http://www.swimming.org/library/documents/2479/download)

LPSC must have a lawful basis to process your personal data, and this policy explains what our lawful basis is in respect of each purpose for which we keep and use information about you. Generally, we are allowed to process your personal data where it is necessary in connection with membership of LPSC and SE or for us to comply with legal obligations.

Please note that links from our website may take you to external websites that are not covered by this policy. We recommend that you check the privacy policies before submitting any personal information to such sites. LPSC will not be responsible for the content, function or information collection policies of these external websites.

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

### **Personal information you submit**

LPSC collects personal information on Swim Club Manager, using e-membership forms you may complete to become a member of LPSC and SE, records of correspondence, details of attendance at club events and via email link from our website [www.leicesterpenguins.club](http://www.leicesterpenguins.club). The information collected from you is used to email and make telephone contact with you to provide information regarding club membership, activities and for use in the event of an emergency.

### **Why we collect personal information**

The principle reasons we process people's personal information are:

Legal – to fulfil legal obligations for health and safety, insurance and child protection purposes.

Contractual – to allow us to provide the members services associated with the running of the club and its activities, such as requests for payments, registers and fees for events.

Legitimate Interest – to send information on activities and events which have been arranged as part of membership.

### **Personal information we collect**

Name

Date of birth

Address

Telephone number(s)

Emergency contact details  
Financial transactions  
Health-related information  
Attendance at training sessions and events  
Swimmer performance data  
Miscellaneous notes and emails  
Disclosure & Barring Service reports  
Qualifications, courses and certificates.

### **How do we use your personal information?**

To process your membership application with the club and Swim England.  
To process competition entries.  
To process swimmer performance data.  
For our own internal records.  
To contact you in response to an enquiry.  
To advise you of club activities and events via email or telephone.  
To meet legal obligations, or valid request, including reporting and investigations under the Swim England Child Safeguarding policy and procedures, "Wavepower".  
To comply with Swim England SwimMark accreditation requirements.

### **Who do we share your personal information with?**

Swim England will receive your personal information when the membership secretary creates an account on the SE online membership system.  
Dependant on roles within the club the following people may also see your personal information:  
Chair, Secretary, Membership Secretary, Treasurer, Welfare Officer, Committee members and Head Coach.

### **Disclosure**

We will not disclose any personal information we collect about you to a third party without your consent. In connection with any membership application you make your information will be passed to Swim England using the SE online membership system.  
In connection with any request or enquiry you make, your information will be passed to the relevant club contact.

There are certain exceptional circumstances in which we may disclose your information to third parties. This would be where we believe that the disclosure is: -

- Required by the law to comply with legal obligations
- Necessary to protect the safety of our members, our property or the public.
- Reporting and investigations under Swim England Child Safeguarding Policy and Procedures.

### **How long do we keep your personal information?**

LPSC will only store your personal information during the duration of your membership after which your data will be deleted.

Exceptions to this rule are; -

We will continue to store only the data needed to meet any legal or Swim England obligations in respect of accidents and personal injury claims, information will be retained until the limitation period has expired.

We may also continue to store any swimmer performance data which is part of the club's competitive records.

### **Your rights in respect of your personal information.**

At any point whilst LPSC is in possession of or processing your personal data, you have the following rights:

Right to be informed – We have written this policy to do just that, but if you have any questions or require more specific information please get in touch.

Right of access – you have the right to request a copy of the information that we hold about you.

Right of rectification – you have a right to ask us to correct data that we hold about you that is inaccurate or incomplete.

Right to be forgotten – you can ask for the data we hold about you to be deleted. In these circumstances we will continue to store only the personal data needed to meet any legal obligations, safeguarding children or to comply with Swim England requirements defending a legal claim.

Right of portability – you have the right to have the data we hold about you transferred to another organisation.

Right to object – you have the right to object to certain types of processing such as direct marketing.

### **Complaints**

In you wish to make a complaint about our collection or use of your personal data, please contact us in the first instance so that we may seek to resolve your complaint.

Please write to the club Chair outlining your complaint. If you do not get a response within 30 days you have the right to lodge a complaint to the Information Commissioners Office (ICO).

Contact details are:

Chair: [leicester.penguins@swimclubmanager.co.uk](mailto:leicester.penguins@swimclubmanager.co.uk)

ICO: [www.ico.org.uk/global/contact-us/](http://www.ico.org.uk/global/contact-us/)

### **Consent**

In agreeing to this Privacy Policy, you are consenting to your personal information being processed by LPSC in the manner described above.

If you have submitted personal information and wish us to cease using it for the purposes described above, please detail your request to the membership secretary: email – [leicester.penguins@swimclubmanager.co.uk](mailto:leicester.penguins@swimclubmanager.co.uk)

### **Changes to this notice**

LPSC 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 the page. For significant changes to this notice we will try to give 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.

Version dated 12<sup>th</sup> April 2019.