



## **PRIVACY POLICY**

City of Sunderland Amateur Swimming Club (COSASC) is committed to respecting your privacy and protecting your personal data. This policy applies to all members and to all those who have registered to become a member. This policy explains how we comply with the law relating to data protection and what your rights are.

We are not legally required to have a data controller, to have oversight of our data protection compliance. COSASC is responsible for the storage and processing of your personal data in a fair, lawful, secure and transparent way.

### **KEY TERMS**

We, us, our, the club	City of Sunderland Amateur Swimming Club (CIC) (COSASC)
Personal data	Any information relating to an identified or identifiable individual.
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership. Genetic and biometric data. Data concerning health, sex life or sexual orientation.

### **PERSONAL DATA WHICH WE MAY COLLECT FROM / HOLD ABOUT YOU**

When registering or applying to register with the Club, or during the course of your membership, we will or may collect the following personal data:

- Title, name, address, telephone number, email address;
- Date of birth;
- Gender;
- Swim England registration number;
- Membership start and end date;
- Squad;
- Records of your interactions with us, such as emails, other correspondence and your instructions to us;
- Payment details
- Details of next of kin, family members, coaches and emergency contacts;
- Records of your attendance, both at training sessions and at events;
- Photographs (where consent given for children);
- Your marketing preferences;



- Details of any county membership;
- Records and assessments, rankings, gradings or ratings, competition results, and performance;
- Any disciplinary and grievance information;
- Your nationality / country of representation;
- Use or movement through our website, including IP address and/or cookies.

## **SPECIAL CATEGORY DATA**

We may also collect, store and use the following special category data:

- Information about your health, including any medical condition, health and sickness records, medical records, health professional information and GP details.

Special category data is collected and processed only with your explicit consent. Special Category health data is only processed for the purpose(s) of:

- Providing to the coaches, Club staff and volunteers to allow the safe running of training sessions.
- Providing to other Amateur Swim Clubs for your safety during event entry.
- Where necessary for the establishment, exercise or defence of legal claims.

## **WHY WE NEED YOUR PERSONAL DATA**

The reason we need your personal data is to be able to administer your membership, and to provide the membership services that you have registered for. If you do not provide us with all of the personal information that we need to collect, this may affect our ability to offer the full membership services to you.

The main purposes for which we process your personal data are as follows:

<b>Why we process your data</b>	<b>The Lawful Basis for processing your data</b>
To administer your membership, including dealing with payments, providing support and responding to enquiries.	To comply with our contractual obligation to provide membership services to you.
To provide information to you regarding Club activities, changes to training times, and membership renewals.	To comply with our contractual obligation to provide membership services to you.
To monitor attendance and engagement.	For our legitimate interest.



Publishing of race and competition results.	For our legitimate interest.
To resolve any issues or complaints.	For our legitimate interest.
For statistical analysis.	For our legitimate interest.
For the purposes of promoting the Club and our events.	For our legitimate interest.
To comply with health and safety requirements.	To comply with our legal / regulatory obligations.
To register for competitions and galas.	To comply with our contractual obligation to provide membership services to you.
To arrange for transportation to certain events.	To comply with our contractual obligation to provide membership services to you.
To ensure your health and safety by considering your fitness, physical and mental health to participate in activities and/or events.	To comply with our contractual obligation to provide membership services to you.
To comply with legal and regulatory obligations, including safeguarding requirements and child protection.	To comply with our legal / regulatory obligations.

## WHO WE SHARE YOUR PERSONAL DATA WITH

Your data will be shared internally within the Club, including to Club volunteers, to allow us to provide membership services to you. The Club will not share any of your personal data with any third party without your explicit consent. Third parties we may share your personal information with include the following:

- Swim England: you will be registered as a member of Swim England (via OMS). It is essential that an email address is provided for registration with Swim England. If you have any questions regarding the privacy of your data with Swim England, you can view their Privacy Policy at [www.swimming.org](http://www.swimming.org) Alternatively, please contact [renewals@swimming.org](mailto:renewals@swimming.org)



# City of Sunderland Amateur Swimming Club

- Media, Social Media & Club Website: where permission has been given, photographs may be posted on social media and the Club Website, for the purposes of Club and event promotion. Gala / competition results may also be posted.
- Club Members: where it is necessary to send group emails regarding changes to training, updates and gala / competition entry.
- Other Amateur Swim Clubs: for the purposes of Gala / Competition entry.
- Our service providers: we only allow our service providers to handle your personal data if we are satisfied that they take appropriate measures to protect your personal data.
- Governing and/or regional bodies: to allow the proper administration of the sport on a local, regional and national level.
- The Government and/or our Regulators: where we are required to do so by law or to assist with their investigations or initiatives.
- The Police, Law Enforcement and Security Services: to assist with any investigations, prevention of crime and the protection of National Security.
- Any party approved by you.
- Cloud Hosting: The Club's data processing may require your personal data to be transferred outside of the EU for the purpose of cloud hosting. The Club will only use such Cloud Hosting if satisfied that appropriate safeguards are in place to protect the security of your personal data.

## HOW LONG WE RETAIN YOUR PERSONAL DATA

Membership data is updated annually, in line with the membership renewal process. Old membership forms are returned to those members that renew their membership, or securely destroyed for non-renewals.

It is important that the personal data we hold about you is up to date and accurate. It is your responsibility to ensure that if there are any changes to your personal data (such as your phone number or email address) during the membership year that you let us know, by emailing [membership@cityofsunderlandasc.co.uk](mailto:membership@cityofsunderlandasc.co.uk)

The duration for which we retain your personal data will differ depending on the type of information and the reason why we collected it from you. Although membership forms are securely destroyed, as set out above, some personal data is retained beyond membership with the Club, for the following reasons:

- To respond to any questions, complaints or claims made by you or on your behalf.
- To record the existence of your membership with the Club.
- To show that we treated you fairly.
- For statistical analysis (where possible, this will be anonymised).



- To keep records required by law, required by our regulators or by our contractual obligations.

We will not retain your data for longer than is necessary for the purposes set out in this policy.

## **YOUR RIGHTS**

You have the following rights in relation to your personal information, which you can exercise at any time, free of charge:

- You have the right to request a copy/access the personal data that we hold about you.
- You have the right to correct any mistakes in your personal data.
- You have the right to be informed about how your personal data is being used.
- You have the right to require us to delete your personal data (in certain limited situations).
- You have the right to require us to restrict or object to the processing of your personal data (in certain limited situations).
- You have the right to receive the personal data that you provided to us, in a format which you can re-use, move, copy or transfer in a safe and secure way, for your own purpose.
- You have the right to object to your personal data being used for marketing purposes.
- You have the right to not be subject to automated individual decision-making and/or profiling.

If you require further information regarding your rights, including the circumstances in which they apply, please contact us, or see the [guidance from the UK Information Commissioner's Office](#).

Please note that if you wish to exercise any of your rights, as set out above, we will require you to provide us with the following:

- Enough information to identify you.
- Proof of your identity and address.
- Which right you want to exercise and the data to which you request relates.

You are not obliged to share your personal data with the Club. However, if you choose not to share your personal data with us, we may not be able to provide membership services to you.



## **DATA BREACHES**

A data breach is any incident that affects the confidentiality, integrity or availability of personal data (including loss, destruction, corruption or disclosure).

Any data breach which results in risk to people's rights must be reported to the ICO within 72 hours and to the data subject without undue delay.

If you discover a breach, you should report it immediately to [president@cityofsunderlandasc.co.uk](mailto:president@cityofsunderlandasc.co.uk)

We will handle data breaches in accordance with the ICO's data breach guidance and we will use the [ICO self-assessment tool](#) to determine whether any breach requires reporting.

## **HOW TO CONTACT US**

If you have any queries in connection with the information that we hold about you, please email [president@cityofsunderlandasc.co.uk](mailto:president@cityofsunderlandasc.co.uk)