



DERVENTIO EXCEL DATA PRIVACY POLICY

1. About this Policy

This Policy explains when and why we collect personal information about our members, how we use it and how we keep it secure and your rights in relation to it.

We may collect, use, and store your personal data, as described in this Data Privacy Policy, and as described when we collect data from you.

We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website <http://www.derventioexcel.org.uk> regularly for any amendments.

We will always comply with the General Data Protection Regulations (GDPR) when dealing with your personal data. Further details on GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

References to **we**, **our** or **us** in this privacy notice are to Derventio Excel Swim Squad.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws, the Committee has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Our contact details" section below.

2. Our contact details

Derventio Excel Swim Squad is affiliated to the East Midland Region of the Amateur Swimming Association, also known as Swim England East Midlands, and to Derbyshire ASA. We can be contacted via email at dxsecretary@derventioexcel.org.uk or info@derventioexcel.org.uk

3. Personal information we may collect from you

Depending on the type of membership you register for with us, you may provide us with, or we may obtain personal information about you, such as:

- 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 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.
- Use by our data processor, Team App, of any movements through the app, personal identification numbers, IP addresses, usernames and other IT system identifying information.
- Records of your attendance at both training and any events attended/hosted by the club.
- Images in video and /or photographic form and voice recordings.
- Identification documents such as passports and identity cards where required for any trips undertaken.
- Details of any county memberships.
- Details of any next of kin, family members, coaches, and emergency contacts.
- Records and assessment of any rankings, competition results, details regarding events attended and performance.
- Any disciplinary and grievance 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 conditions or allergies.
- Health and sickness records
- Information about your race or ethnicity.
- Medical records and health professional information.

We do this on the basis that:

- The processing is necessary for reasons of providing a safe environment for training/competing.
- The processing is necessary for reasons of substantial public interest, on a lawful basis.
- It is necessary for the establishment, exercise or defence of a legal claim.
- Based on your explicit consent.

We typically collect personal information about our members when you apply to become a member of the club, when you make a query and / or complaint or when you correspond with us by phone, email or in some other way.

If you provide us with details of next of kin, family members and emergency contacts they have a right to know and to be aware of the personal information we hold about them, how we collect it and how we may use and share the information. Please share this privacy policy with them.

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
To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.





To arrange and manage any contracts for the provision of any services or products	Contact details, transactions, and payment information. Records of your interactions with us.	This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have purchased from us.
To send you information, which is included within your membership benefits package, including details about advanced ticket information, competitions and events, partner offers and discounts and any updates related to our sport.	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events, products	Contact details and marketing preferences.	Where you have given us your explicit consent to do so
To answer 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 your membership.
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 your membership and run our club and in some cases we may have legal or regulatory obligations to retain records.



		For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the club, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements	Records of attendance, CCTV footage and other information obtained through electronic means such as swipecard and key fob records, 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.
To administer your attendance at any courses or programmes you sign up to	All contact and membership details, transaction, and payment data. Details of any county 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 programme
To arrange for any trip or transportation to and from an event	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health, and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.



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.	Health and medical 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 above above this table.
To gather evidence for possible grievance or disciplinary hearings	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. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
For the purposes of equal opportunities monitoring	Name, title, date of birth gender, information about your race or ethnicity and health and medical information	We have a legitimate interest to promote a sports environment that is inclusive, fair, and accessible.
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

4. How we protect your personal data

We will not transfer your personal data outside of Swim England without your consent.

We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse or unauthorised alteration or destruction.





Please note, however, that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

For any payments which we take from you online we will use a recognised online secure payment system.

We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Disclosure of your personal Information

We will share personal information with the following parties:

- Any party approved by you.
- Any governing body 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.
- 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 retention of crime and the protection of national security
- Our data processor, Team App, to allow proper management of personal correspondence.

6. How long we keep your information

We will hold your personal data on our systems for as long as you are a member of the club and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations (e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims).

We securely destroy all financial information once we have used it and no longer need it.

It is important to ensure the personal information we hold about you is accurate and up to date. You should contact the Club Secretary (dxsecretary@derventioexcel.org.uk) if anything changes.

7. Your rights

You have rights under the GDPR to:

- access your personal data
- be provided with information about how your personal data is processed
- have your personal data corrected
- have your personal data erased in certain circumstances
- object to, or restrict how your personal data is processed
- have your personal data transferred to yourself or to another business in certain circumstances



Where you have given us your consent to use your personal information, you have the right to withdraw this consent at any time, which you may do by contacting us as described in section 2 'our contact details'.

You have the right to take any complaints about how we process your personal data to the Information Commissioner:

Tel: 0303 123 1113

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

If you do not agree with how we are using your personal information we are here to help and would encourage you to contact us in the first instance