

**Gloucester City Swimming Club**  
**PRIVACY NOTICE FOR OUR MEMBERS**

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you have registered to become or are a member of our club. This notice explains how we comply with the law on data protection, what your rights are and what information we hold and why.

For the purposes of data protection we will be the controller of any of your personal information.

References to **we, our, us or GCSC** in this privacy notice are to Gloucester City Swimming Club.

**Data Protection Officer**

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

**1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

When you and/or your child join as a member we will collect:

- personal contact details of the swimmer and the adult with parental responsibility/next of kin 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 attendance at any events hosted by us;
- records and assessment of any swimmer rankings, times, competition results, details regarding events attended and performance.

**2. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following "**special categories**" of more sensitive personal information regarding your health, including any medical condition. In the table below' we refer to these as the "special category reasons for processing of your personal data".

**3. WHEN WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members when you apply to become a member of the GCSC.

The information is collected in writing and electronically via our membership system ActiveWorks

If you are providing us with details of next of kin, family members and emergency contacts they have a right to know and to be aware of 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 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.

**4. HOW WE USE YOUR INFORMATION**

The table below describes 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
<b>To administer your membership to GCSC, including dealing with payments and any enquiries made by you</b>	All contact and membership details, transaction and payment information, records of your interactions with us. If you have selected the facility to store your credit/debit card details this will remain on ActiveWork. Bank account details for refunds.	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To send you information about competitions and events</b>	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To answer your queries or complaints</b>	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.
<b>Retention of records</b>	All the personal information we collect.	<p>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.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<b>For the purposes of promoting the club.</b>	Images in photographic form.	Where you have given us your explicit consent to do so. For example, we would obtain consent where we intend to use images of members in any promotional material.
<b>To administer your attendance at any events you sign up to</b>	All contact and membership details, transaction and payment data.	This is necessary to enable us to register you on to and properly manage and administer your attendance at events.
<b>To arrange for any trip or transportation to and from an event</b>	Identification documents details of next of kin, family members and emergency contacts, transaction and payment	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.</p> <p>We process special category personal data on the basis of the “special category reasons for</p>

	information, health and medical information.	processing of your personal data” referred to in section 2 above.
<b>To use information about your physical or mental health 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.</b>	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 2 above.
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults in compliance with our safeguarding requirements</b>	Information about any criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

## 5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you.**
- **To any governing bodies 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.
- **ActiveWorks:** for the purposes of administering your membership and the events your children take part in
- **Other clubs:** To enter competitions.
- **Any coaches who have a contract with GCSC:** Emergency details are shared on a need to basis with contracted GCSC coaches.

## 6. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union via ActiveWorks, who is compliant with GDPR.

We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "Contacting us" section below.

## 7. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it 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. Information relating to children or regarding services to children will be stored until a review of the moratorium issued as part of the IICSA in July 2015 comes to an end in 31/12/2021 at which time the retention periods will be updated and this privacy notice will be amended.

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.

You may be able to update some of the personal information we hold about you through ActiveWorks. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

## 8. **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 we hold about you;
- the right to request the correction of inaccurate personal information we hold 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 request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

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.

## 9. **CHANGES TO THIS NOTICE**

This is a new policy for us and we are likely to 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 this page. For significant changes to this notice we will try to give you 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.

## 10. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [gcscommunications@gmail.com](mailto:gcscommunications@gmail.com) or write to us at Gloucester City Swimming Club Ltd Beaumont House, 172 Southgate St, Gloucester , United kingdom, GL1 2EZ.

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