



Scottish
Swimming

Scottish Swimming Privacy Notice – Members March 2023

What we need

The Scottish Amateur Swimming Association, trading as Scottish Swimming, will be a “controller” of the personal information that you provide to us on our online membership system (known as JustGo), unless otherwise stated below.

When you register as a member of Scottish Swimming or renew your membership (including if you are registering or renewing on behalf of a child under the age of 16), we will ask you for the following personal information:

- contact details – name, address, gender, nationality, email address (for children under 16 this is the email address of the parent), and date of birth;
- which club or Swim School you are a member of;
- membership criteria / category – swimmer, non-swimmer or course attendee; and
- equality information – disability (if any), ethnic group, religious belief, gender and sexual orientation.

The above information is provided by you via our online membership system (Just Go). During the course of your membership, we may also collect any personal information that:

- you provide to us in your communications, interactions or correspondence with us, including but not limited to, via social media; and
- is provided to us by your club or Swim School, including but not limited to, in relation to our complaints and appeals procedure or in connection with any incident.

How we use your personal information

We need to collect our members’ personal information in order to:

- • maintain a register of our members and send you invitations to members' events, such as general meetings, provide you with core member services, including, insurance, licensing and PVG checks, set up your online membership account and administer your account online, and send you membership communications by post or email in relation to essential membership services, including but not limited to, membership renewals and information on membership benefits;
- comply with our sportscotland reporting requirements, including but not limited to, reporting on the size, achievements and profile of our members;
- assist sportscotland with their research into participation in sport, by inviting members by email to participate in their ad hoc surveys always in relation to aquatics;
- promote and encourage participation in aquatic sports by sending members’ communications and booking information for upcoming competitions and events. Our competitions and events may be filmed for live streaming purposes and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;
- provide competition in aquatic sports by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;

- monitor and develop participation in aquatic sports by monitoring members' engagement and participation through attendance and inviting our members to participate in surveys for researching and development purposes;
- develop and maintain our members' qualifications and credentials, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training and PVG / wellbeing and protection requirements;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to aquatic sports. We will use your personal information to investigate your complaint, to suspend membership and take disciplinary action where appropriate; and
- run the Scottish Swimming membership check which can be found online at www.scottishswimming.com/membership/membership-check.aspx to ensure that a member is eligible to compete or officiate at an event.

Other uses of your personal information

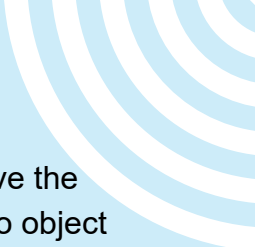
We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

We may be asked by our member clubs to collect and store personal information about their individual members. Where we do this, the clubs have a responsibility as “controllers” to provide their members with privacy notices and we will not use such personal information for any other purpose.

Our legal basis for holding and using your personal information

Under applicable data protection law, we must have a legal basis to collect, hold and use your personal information. Our legal bases are:

- to perform and manage our membership contract with you;
- to comply with our legal obligations under the Companies Act 2006, sportscotland regulatory requirements, the Equality Act 2010 and other applicable legislation that we must comply with;
- to protect your vital interests;
- with your consent (in limited circumstances); or
- our legitimate interests – while you have a legitimate interest in the protection of your personal information, we also have an overriding legitimate interest in handling and using your personal information, for example, to ensure the effective functioning of our organisation as a Scottish sports governing body and members' organisation.



Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us at DP@scottishswimming.com. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member.

We may also collect personal information that includes "special categories" of personal information under applicable data protection legislation. For example, we are required to use our members' personal information relating to your disability (if any), ethnic group, religious belief, gender and sexual orientation for equality monitoring purposes as required by **sportscotland**.

We will process such personal information through aggregated and anonymised reports to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality within our sport.

Whether information has to be provided by you and why

We require you to provide us with the personal information requested by Just Go to enable us to register you as a member

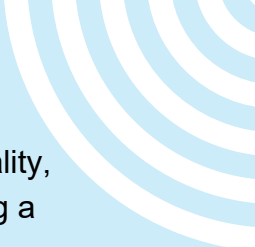
Who we share your personal information with

If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with members of the Scottish media, sponsors, sportscotland and Sports Partners (including Scottish Leisure Trusts, Scottish Local Authorities, Swimming Clubs, Scottish Disability Sport, and Scottish Universities) for promotional and/or journalistic purposes.

We share your basic personal information (name, gender, date of birth, address, email address, telephone number, and qualifications if applicable) with the administrator of your swim school or club for the purposes of managing your membership. The club or swim school have their own privacy notice to cover any additional use of your personal data.

For active competitive members, your basic personal information (name, gender, date of birth and which club(s) you are a member of) is shared with the Swim England rankings system, which can be found at www.swimmingresults.org Swim England will be the "controller" of such personal information upon receipt and you should read their privacy notice available at www.swimming.org/library/documents/147/download





For active competitive swimmers, your basic personal information (name, gender, nationality, date of birth) is shared with British Swimming for the purposes of creating and maintaining a swimming performance database to enable the world class programme to fulfil its agreed strategic priorities with UK Sport and to provide more insight to the Home Nation Talent Programmes. British Swimming will be the "controller" of such personal information upon receipt and you should read their privacy notice available at www.britishswimming.org/about-us/policy-documents/british-swimming-privacy-policy/

For active swimming and non-swimming members, your basic personal information (name, gender, date of birth if over 16, type of membership, and club(s) you are a member of) is shared with the Scottish Swimming membership check system so meet convenors can check eligibility to compete or volunteer, which can be found at www.scottishswimming.com/membership/membership-check.aspx

Occasionally we will carry out ad hoc research into our membership, and will instruct a partner to carry out this research on our behalf. Final reports are only shared back with Scottish Swimming. To carry out the research, the partner will agree to treat the data in a confidential matter through a services contract. Your personal data of name, date of birth, local authority, membership type, club will be shared for the sole purpose of carrying out research and not shared with anyone outwith the services contract.

For members who are attending Scottish Swimming courses or modules or the Scottish Swimming Teaching Qualification (SSTQ), we use three platforms called OneFile and HIVE learning and Brightspace for the purposes of administering our courses. We will share your basic personal information (name, address, membership number, email, date of birth) onto these systems however Scottish Swimming will remain the controller of the data. OneFile, Hive and Brightspace process learners' personal information on our behalf as "processors" and are subject to written contractual conditions to only process that personal information under our instructions and protect it.

For members attending courses that are part of SQA, Scottish Swimming will share your name, membership number, SCN number, address, date of birth and email address with two platforms called SQA solar and surpass viewer. This is for the purpose of SQA administering your qualifications. Information will only be processed under our instructions and Scottish Swimming remain the controllers of the data.

For members who are attending the Child Wellbeing and Protection in Sport (CWPS) course, once registered on the JustGo platform, Scottish Swimming will share your name and email address with sportscotland, for the purposes of administering the courses. sportscotland will add your data to their learning platform (Brightspace), and will become the controller of this data for the purposes of providing learning links, monitoring course progress and issuing certificates. Once you complete your course, sportscotland will advise Scottish Swimming so that your records can be updated on Just Go.





For members who are tutors, Scottish Swimming will share name, email address and which local authority you offer training in, on the Scottish Swimming website, for the sole purpose of allowing prospective course organisers to arrange courses. You can opt out of this list at any time by writing to education@scottishswimming.com

For non-swimming teachers, coaches and members in an administrative role within a club or swim school, your name, club, membership number and email address will be shared with the HIVE online platform and you will be invited to join the platform.

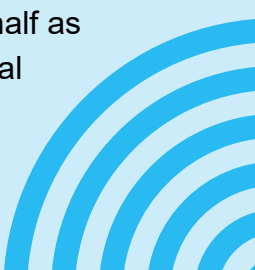
As a member you have the option to opt-in should you wish to join the system which encourages shared learning, development and interaction with other members in a similar role. You can leave this platform at any time.

For non-swimming volunteers who sit on board, council or committees (including editorial board, audit and risk committee, coaches technical panel, technical officials, disciplines, swimming committee and district executives), your name, email address and contact number will be displayed on the Scottish Swimming website and information guide (paper and online on the Scottish swimming website) for the purposes of allowing members to contact you about relevant queries concerning your committee. Each committee secretary will confirm with you that you are happy to have this information shared and you can opt out by advising the committee secretary.

For volunteers in an administrative role with their member club, your name, club, membership number, email address and STO number (if a technical official) will be shared with the appropriate district representative for the purposes of collecting district fees, and for managing aquatics events. We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children.

Scottish Swimming use a platform called Globocol Sport Safeguarding Software for the purposes of managing wellbeing cases. This is to enable the company to comply with statutory obligations. For any wellbeing cases, data will be stored using Globocol for safeguarding reporting purposes only. Scottish Swimming would remain the controller of any data stored in this platform. We may also share personal information with our professional and legal advisors for the purposes of taking advice. In the event that we do share personal information with external third parties, we will only share such personal information as is strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

Scottish Swimming employs JustGo to administer our membership database, as part of which JustGo contracts third party payment providers to process your payments of our behalf. JustGo and its payment providers process our members' personal information on our behalf as "processors" and are subject to written contractual conditions to only process that personal information under our instructions and protect it.



How we store your personal information

Your personal information is stored on our electronic filing system and our servers based in Europe, and is accessed by our staff and volunteers for the purposes set out above.

How long we keep your personal information

We will only keep your personal information for as long as necessary to provide you with membership services. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your membership with us for six years. We will keep certain personal information of members for longer in order to confirm your identity, when you were a member of Scottish Swimming and for how long. We need to do this to comply with the Companies Act 2006, which requires us to keep a register of members or in the event of a claim against Scottish Swimming.

Your rights

You can exercise any of the following rights by writing to us at DP@scottishswimming.com or by logging on to your account at <https://scottishswimming.justgo.com/Workbench/Home>

Your rights in relation to your personal information are:

- you have a right to request access to the personal information that we hold about you by making a “subject access request”;
- if you believe that any of your personal information that we hold about you is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- you have a right to request that we restrict the processing of your personal information for specific purposes;
- if you wish us to delete the personal information that we hold about you, you may request that we do so;
- you have a right to object to our processing of your personal information in certain circumstances;
- you may request personal information concerning you held by us, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit such information to a third party in certain situations; and
- if applicable, you have a right to object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.

Any requests received by Scottish Swimming will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at www.ico.org.uk



Scottish
Swimming

W: www.scottishswimming.com

E: DP@scottishswimming.com

T: 01786 466520

Registered Name and Office:

*Scottish Amateur Swimming Association Ltd (trading as Scottish Swimming),
University of Stirling Sport, University of Stirling, Stirling, FK9 4LA*