



Truro 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 your interest in joining the club or are a member of our club. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

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

What personal information do we collect about you?

We use a Microsoft form to collect information from prospective members to add them to the waiting list. The following personal information is collected and stored in an excel file held on the Truro City Swimming Club One Drive:

- Prospective swimmers name, gender, date of birth and swim experience.
- Parent / guardian name and contact email address.

We use Team Unify ([Truro Swimming Club Home \(teamunify.com\)](https://uk.teamunify.com/team/swtcsc/page/home)) for the registration and billing of members, entering competitions, billing for competitions and the recording of competition results and personal best times. As part of our processes, the following personal information about swimmers and their parents / guardians is collected and stored in Team Unify:

- Athletes name, preferred first name, date of birth, gender, squad, billing group, sub billing group, location, kit sizes, joining date, Swim England registration details including membership number, personal best times, meet results.
- Parent / legal guardian names, email address, alternative email addresses, address, home, work and mobile phone numbers, account access settings, emergency contact details,
- Payment card details, invoices and payment schedule.
- Videos and photos as part of our website in Team Unify
<https://uk.teamunify.com/team/swtcsc/page/home>

What special categories of personal information do we collect about you?

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 condition, health and sickness records, medical records and health professional information relevant to swimming.

How do we use swimmer and parent/legal guardian personal information?

We use the personal information collected for the following purposes:

Purpose	Personal information used	Lawful basis
To administer any prospective membership you have with us and managing our relationship with you.	All contact and prospective membership details and records of your interactions with us.	This is necessary to enable us to properly manage and administer your prospective membership with us.
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 send you information which is included within your membership benefits package, including details about competitions and events, partner offers and discounts and any updates on swimming.	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
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.

		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. 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.
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.	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. 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.

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 2 above.
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. 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. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
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.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

Disclosure of your personal information

We share personal information with the following parties:

- 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.
- Other service providers: for example, payment processors, data analysis CCTV contractors, promotional advisors, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
- 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 prevention of crime and the protection of national security.

How long do we keep personal data?

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. Generally, where there is no legal requirement we retain all physical and electronic records for a period 1 month after your last contact with us or the end of your membership. Exceptions to this rule are:

- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.
- Account name to maintain the financial integrity of the database.
- News articles previously published on our website.

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 are able to update the personal data we hold about you through our membership system Team Unify. Alternatively, you can contact us by using the details set out in the **Contacting us** section below.

Your rights in relation to your 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.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

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.

Changes to this notice

We 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 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.

Contacting us

In the event of any query or complaint in connection with the information we hold about you, please email secretary@truocitysc.co.uk