



## SERPENTINE SWIMMING CLUB

### PRIVACY NOTICE FOR MEMBERS& GUESTS

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 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 the Serpentine Swimming Club. We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Data Protection Compliance Manager 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

We may obtain **personal information** about you, such as:

- personal contact details that allows us to contact you directly such as name, title, postal address, email address, telephone numbers, date of birth, gender, membership start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- use of and movements through any online portal, Google chat group, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events hosted by us;
- images in video and/or photographic form and voice recordings during Club events;
- your marketing preferences so that we know whether and how we should contact you.
- identification documents such as passport and identity cards;
- details of next of kin, family members, and emergency contacts;
- records and assessment of any rankings, grading, handicaps or ratings, competition results, details regarding events/competitions attended and performance;
- any disciplinary and grievance information.

#### 2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use more sensitive personal information regarding your criminal records in the event that you volunteer to take up a responsibility within the Club's Committee as this may give you responsibilities for the care of children in the Club.

#### 3. WHERE WE COLLECT YOUR INFORMATION

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

#### 4. USES MADE OF THE 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 any membership you have with us, including dealing with payments</b>	All membership details, payment information, records of your interactions with us, photo	This is necessary to enable us to properly manage and administer your membership contract with us

	for your membership card	
<b>To send you information about the Club including reminders to pay the annual membership fee, details of races, social events and any updates on swimming issues</b>	Contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us
<b>To enable you to have access to the Club Google chat group</b>	Email address	Where you have given us your explicit consent to do so
<b>Retention of records to answer your queries or complaints and establish your voting rights within the Club</b>	All the personal information we collect	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership. They are also need to determine your voting rights at the Club's AGM. 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. This may continue after you cease your membership.
<b>Criminal Record Checks of Committee members with responsibilities for the care of children in the Club</b>	All the personal information we collect, and that obtained from the Authorities or agencies	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>The security of our IT systems</b>	Your usage of our IT systems and online portals	We have a legitimate interest to ensure that our IT systems are secure
<b>To conduct data analytics studies to better understand event attendance and trends within the sport</b>	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
<b>For the purposes of promoting the Club, its races and winners, our website, events and membership</b>	Images in video and/or photographic form, names	We have a legitimate interest in informing members and visitors to the website about the races including details of the winners and other Club life for the proper enjoyment and participation of members and prospective members. The Club Rules include your explicit consent for us to use your image during races.
<b>To comply with health and safety requirements</b>	Records of attendance, medical information about your health, details of your age/date of birth	We have a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.  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 administer your attendance at</b>	All contact and	This is necessary to enable us to register you

<b>any swims, courses, socials or groups you sign up to (e.g. Bridge to Bridge race, first aid, Christmas party, choir practice)</b>	membership details, transaction and payment data.	on to and properly manage and administer your attendance on the course and/or social or group
<b>To gather evidence for possible grievance or disciplinary hearings</b>	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
<b>To provide your contact details to another member who asks for them</b>		Where you have given us your explicit consent to do so

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.

## 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.
- **Other service providers:** for example, email marketing specialists, 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.

## 6. 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. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding guests or unsuccessful membership applicants where we hold records for a period of not more than 12 months;
- 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.

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 can contact us by using the details set out in the "**Contacting us**" section below.

## 7. **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.

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.

## 8. **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.

## 9. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email the Serpentine Swimming Club [serpenteswimmingclub@gmail.com](mailto:serpenteswimmingclub@gmail.com) or write to us care of George Cselko, Honorary Secretary, 1 Wentworth Mansions, Keats Grove, London NW3 2RL.

## 10. **TWITTER, FACEBOOK AND GOOGLE CHAT GROUPS**

Your membership of SSC entitles you to join these groups on a non-contractual basis with SSC. These groups are used to facilitate contact by SSC or on our behalf by our members or members contacting members about swimming, water temperature, products, lost property, tickets and social events generally). Individuals sign up to them on a completely voluntary basis – it is not a requirement of your SSC

membership that you join any social media group and they are subject to twitter, facebook and google terms of use respectively.

Dated 24 MAY 2018