



City of Lincoln Pentaqua's SC Privacy Statement

The name and contact details of our organisation:

City of Lincoln Pentaqua Swimming Club, c/o 13 Gleedale, North Hykeham, LN6 8PN
Contact person – Clare Gilman-Abel, Secretary

City of Lincoln Pentaqua Swimming Club and Swim Academy are committed to protecting and respecting your privacy. For any personal data, you provide for the purposes of your membership of both the Club and participation in the Academy, City of Lincoln Pentaqua Swimming Club is the Data Controller and is responsible for storing and otherwise processing that data in a fair, lawful, secure and transparent way.

As a swimming club, we exist to offer our members the opportunity to participate in aquatic sports through the teaching and coaching of swimming. To ensure that we achieve this we gather and retain information about members and individuals participating in activities we organise

The law requires us to have a lawful reason for retaining that data.

There are 5 permitted categories: -

1. Information required for performing the contract with the individual

This covers the data we hold regarding club membership and Academy participation - namely name, gender, age, contact details, medical conditions and personal best swimming times (PB's). It also covers taking contact and payment details for paying fees and card payment acceptance machines.

2. Information retained that requires a person's consent

Consent can in future be given when a new member completes an application to join the club/register with the Academy. For existing club members consent to receiving information needs to be given by subscribing to the club's communication system (MailChimp).

3. Complying with a legal obligation

For example, running DBS checks on volunteers working with children.

4. To protect a person in an emergency

For example, when someone is unwell, requiring first aid or medical services need details to retrieve medical information.

5. Pursuing a legitimate interest

For example, when we contact members seeking individuals to participate in an event. We do not use automatic decision taking software.



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What personal data we hold on you

You may give us information about you by filling in membership/registration forms (hard copy or online), or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register with the Club and Academy, and for Club members, this includes a subscription to our email communication system. The data we (Club and Academy) routinely collect includes member and guardian's names, addresses, dates of birth, telephone numbers, email addresses, and medical information on conditions that may affect an individual's ability to train.

We collect this data directly from our members and Academy participants when they join the Club/Academy via their membership/registration and medical forms.

Swimmer's PB's are not stored by the Club, as we use the information stored by Swim England, accessible via their website.

Images – our use of images of swimmers and Club members are governed by Wavepower, Swim England's Child Safeguarding Policy. This document is available here:

<http://www.swimming.org/swimengland/wavepower-child-safeguarding-for-clubs/>

On joining we will provide you with the opportunity to grant permission for use of images taken in a Club/Academy activity.

We don't keep individual's financial details necessary to process subscription payments as this is managed by our providers of this option – GoCardless, Quickfile and Stripe in the case of Club members, and PayPal for Academy payments.

The data we collect from self-employed contractors includes names, addresses, telephone numbers and e-mail addresses.

Why we need your personal data

The reason we need your data is to be able to administer your membership and provide the membership services you are signing up to when you register with the Club and Academy. This includes:

For training and competition entry:

- sharing personal data with Academy teachers/Club coaches or officials to administer teaching/coaching sessions;
- sharing personal data of Club members with Club team managers to enter events;
- sharing personal data of Club members with leagues, county associations (and county schools' associations) and other competition providers for entry in events.



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For funding and reporting purposes:

- sharing anonymised data with a funding partner as a condition of grant funding e.g. Local Authority;
- analysing anonymised data to monitor Academy and Club trends; and
- sending an annual club survey to improve your experience as a Club member

For membership and Academy/Club management:

- processing of membership forms and payments;
- sharing data with committee members to provide information about Club activities, membership renewals or invitation to social events;
- Club emails promoting club activity and competitions
- publishing of event and competition results; and
- sharing information on volunteering opportunities

Any special category health data we hold on you is only processed for the purpose(s) of passing health data to Academy teachers and Club coaches to allow the safe running of training sessions. We process this data on the lawful basis of consent. Therefore, we will also need your explicit consent to process this data, which we will ask for at the point of collecting it.

Access to data:

Data (swimmers' and members' names and email addresses) are stored in digital form on password protected computers and in the form of written documents (membership/registration forms).

All written documents are scanned and stored securely in the cloud provided to the Club by Microsoft Office 365. These are removed from this storage facility up to one year after a member's resignation from the club (see Retention Schedules below).

Access is limited to the following members of the Club's Committee: Chairman, Treasurer, Secretary, Membership Officer, Welfare Officer, Head Coach, Swim Academy Manager to ensure the smooth and efficient running of our club. PB and competition information is also accessed by the Head Coach and coaching team from Swim England's website. We regularly review who has access and ensure it is limited to only the appropriate individuals.

If you have any questions regarding the above information or you wish to update your details or remove your personal data from our records, please inform us contacting the Secretary via email to: secretary@pentaqua.org. However, please note that should you request us to remove your personal data we will not be able to process and administer your membership and involvement in the Swim Academy.



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Non-member's data

On occasion, we may collect personal data from non-members/non-Academy participants such as any non-member participant who fills in a health disclaimer or form at a swim camp/taster event. This information will be stored for 30 days after an event and then destroyed securely. Our lawful basis for processing data is consent. Therefore, we will also need explicit consent from non-members to process this data, which we will ask for at the point of collecting it.

The categories of recipients of personal data

In order to operate effectively as a swimming Club and Academy, your data will be received by the following, and their usage of it is governed by their Privacy/Data Protection Policies:

Swim England: When you become a member of the Club, you will also automatically be registered as a member of Swim England.

Quickfile: Used for all club financial information. Quickfile Privacy Policy is available from: <https://community.quickfile.co.uk/t/privacy-policy/18934>

MailChimp: Used for all Club communications including emails. Privacy Policy available from: <https://mailchimp.com/legal/privacy/>

Academy emails: Sent from a secure email account.

Payment information: managed by our providers of this option – GoCardless, PayPal and Stripe in the case of Club members (Privacy Policy available from:

<https://gocardless.com/legal/privacy/>) and PayPal for Academy payments. (Privacy Policy available from: <https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev>

Stripe Privacy Policy is <https://stripe.com/guides/general-data-protection-regulation>

Retention Schedules.

All records are kept whilst the member remains a member of the club/swimmer in the Academy. On leaving, data is retained for a maximum of one year and then destroyed. Other records are reviewed annually, and obsolete records are removed.

Details of your transfers to third countries including documenting the transfer mechanism safeguards in place

As a Club/Academy we do not transfer data to third countries, however personal data including swimmers' names, members' names, email addresses, is stored on the Cloud storage system provided to the Club by Microsoft Office365.



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Your rights over your data

You have a right to access your personal data held by us. This will be provided free of charge in suitable format within one month of receipt of written request to Secretary.

In the case where our processing of data is based on your consent, you have a right to withdraw that consent at any time by writing to the Secretary. You have a right to object to processing, correct errors, erase old data and limit the processing of data.

You have a right to lodge a complaint with the supervisory authority which is the Information Commissioners Office (ICO).

As a data subject, you are not obliged to share your personal data with the Club. If you choose not to share your personal data with us we will not be able to register or administer your membership or involvement with the Swim Academy.

May 2018