

The Harrow
Kingfisher Swimming Club
For Disabled People

Members Privacy Policy

1) Introduction

The Harrow Kingfishers Swimming Club for Disabled People respects your personal privacy and is committed to protecting your personal data. This Privacy Policy explains how we use your personal data and the steps we take to protect this information. As Data Controllers we explain your privacy rights and how the law protects you with reference to the Data Protection Act 1998 and the EU General Data Protection Regulation 2018.

Please note that links from our website may take you to external websites which are not covered by this policy. We recommend that you check their privacy policies before submitting any personal information to such sites. We will not be responsible for the content, function or information collection policies of these external websites.

If you have any questions about privacy or data protection refer to the Contact Details section.

2) Personal Data

We need to keep and process information about you in order to provide you with a service whilst a member of the Club. Whenever required we will ask for your explicit consent to provide additional information from third parties. This will be required in order for us to make a risk assessment about your ability to swim or when joining for volunteering opportunities. This additional information may include medical evidence from professional responsible for your care and wellbeing or enhanced disclosures.

2a) Information you provide to us

We collect personal information about our members when you become a member of our Club. We may receive personal information about you whenever you contact us. For example, by doing the following:

- Enquiring about our products, services competitions or events.
- Entering our event and competitions.
- Telephoning, texting, writing by post or emailing us.
- Enquiring about membership or applying for volunteering opportunities.
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This information may include the following:

- Normal identification information, such as your full name, date of birth, age, gender.
- Contact information, such as your postal address, email address and telephone numbers.
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us.
- Records of your attendance at any events or competitions hosted by us.
- Images in video and/or photographic form and voice recordings. Our competitions and events may be filmed for live streaming purposes.
- Payment information
- In respect of volunteering applications, your CV including details of your education and employment history (and any other information which you may choose to provide to us with your CV)
- Nature of your disability.

We do not collect any personal information about you on our Club website. However our web hosting service provider collects and provides anonymous usage statistics; where in the world visitors to our web site originate; the browser and technology used.

2b) Information we collect about you from other sources

We may collect information about you from other sources. This may include the following:

- Publicly available information, from sources such as Companies House and the Electoral Roll.
- Information you have shared publicly, including on social media.
- If you apply for a job or a volunteer position, we may collect information about your criminal record by obtaining a DBS check through an approved agency.
- Information from third parties - for which we require your explicit consent to obtain and ask you to provide explicit permission for the 3rd party to disclose information about you to ourselves.

This list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this policy.

2c) Information we receive about you from other sources

Sometimes you will have given your consent for other websites, services or third parties to provide information to us. For example DBS checks for volunteer staff or information provided on the medical advice note to aid our risk assessment.

3) How we use your personal data

We take data protection law seriously, so below we have set out exactly how and why we use your information, and what our legal basis is to be able to use your information in each way.

3a) Providing our services

It is necessary for us to use personal information about you when you become a member.

Using your information in this context is necessary so that we can:

- Provide you with information about the services
- Provide members with information which is included within your membership package including details about our insurance, advanced information for events.
- To carry out our obligations arising from your membership.
- Verify your identity
- Deal with any complaints you may have.
- Contact you about any changes that we make to our services, events or organisation.
- Administer our website, including troubleshooting problems, analysing statistics, conducting research and tests and keeping the site secure

If you enquire about, or apply for, a volunteering opportunity, it is necessary for us to use your personal information as part of the recruitment process, in order to assess your suitability for a particular role.

3b) Telling you about events

We may use your information to tell you about events, meetings and Club news We will communicate to our members details of our events and competitions for the purposes of promoting the development of the sport and to enable members to participate in the sport at a local, regional and national level.

3c) Making our organisation better

We always want to offer the best services, events and experience that we can. Sometimes this means we may use your information to find ways that we can improve what we do, or how we do it. In this context, we will only use you information where it is necessary so that we can:

- Review and improve our existing services and develop new ones
- Review and improve the performance of our systems, processes and staff (including training)

3d) Contacting you

We want to stay in touch with you. Sometimes we may need to use the information that we have about you in order to respond to your questions or let you know about important changes.

We will only use your information in this respect where it is necessary so that we can:

- Interact and respond to any communications you send us, including where you use the Contact Us section, and any social media posts that you tag us in
- Let you know about any important changes to our business or policies

3e) Verifying your identity

We may use your information where it is necessary for us to do so in order to meet our legal obligations or to detect and prevent fraud, money-laundering and other crimes.

3f) Protecting you and others from harm

We may use your information where it is necessary to protect your interests, or the interests of others. This may include in the event of criminality such as identity theft, piracy or fraud. We need all the categories of information listed above to allow us:

- i. to provide our services to you;
- ii. to enable us to comply with legal obligations; and
- iii. to pursue legitimate interests of our own or those of third parties (provided your interests and fundamental rights do not override those interests).

The situations in which we will process your personal data are listed set out in the table below and indicate the purpose or purposes for which we are processing or will process your personal information.

Purpose	Perform our service	Comply with legal obligations	Pursue legitimate interests
Verifying your identity	X	X	X
Making a decision to supply our services	X		
Administering the service	X		
Administering your entries into events and competitions			X
Make the benefits of membership available to you	X		X
Report competition results			X
Dealing with any complaints you may have	X		X
Logistics management and planning, including accounting and auditing		X	X

Making arrangements for the termination of our service	X		X
Making repairs, alterations and improvements to the services supplied	X	X	X
Dealing with legal disputes involving you		X	X
To suspend membership and take disciplinary action where necessary			X
Complying with health and safety obligations	X	X	X
To detect and prevent fraud, money laundering and other crimes		X	X
To review and improve the performance of our systems, processes and staff (including training)			X
To interact and respond to any communications you send us, including social media posts that you tag us in	X		X
To let you know about any important changes to our business, policies, rules and regulations	X		X
To ensure that the information that we hold about you is accurate and up to date	X		X
To protect your interests, or the interests of others (such as in the event of criminality such as identity theft, piracy or fraud)		X	X

3g) Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4) Who do we share your personal information with?

4a) Sharing your information within Kingfishers

We share the information that you provide to us with our Coaches, teachers and helpers so that we can provide our services to you.

4b) Sharing your information with third parties

Only when necessary, we may share pertinent information that you provide to us with affiliated clubs, bodies, associations and organisations in order to allow them and us to properly administer the sport of swimming on a local, regional and national level. This will generally be in order to participate in invitation gala or other sporting events.

There are certain exceptional circumstances in which we may disclose your information to third parties. This would be where we believe that the disclosure is:

- Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings
- Necessary to protect the safety of our employees, our property or the public
- Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5) How long do we keep your personal information?

We will only store your personal information for as long as we need it for the purposes for which it was collected. Where we provide you with any service, we will retain any information you provide to us at least for as long as we continue to provide that service to you. If you apply for a volunteering opportunity (or otherwise send us your CV) we will retain your CV (and any publicly available information, for example from social media) for a period of 3 months. If we are considering you for a particular role, we may retain this information for longer than that period.

In all other circumstances, we will keep all physical and electronic records of your information for a period of 6 years after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to personal injury claims, 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 you have worked for us.

6) How do we protect your personal information?

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy.

All information you provide to us is stored securely. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

7) What rights do you have in respect of your personal information?

7a) You have the right to be informed

We have a legal obligation to provide you with concise, transparent, intelligible and easily accessible information about your personal information and our use of it. We have written this policy to do just that, but if you have any questions or require more specific information, you can get in touch using Contact Us section of the website.

7b) You have the right to access your personal data

You have the right to ask us to confirm whether or not we hold any of your personal information. If we do, you have the right to have a copy of your information and to be informed of the following:

- Why we have been using your information
- What categories of information we were using
- Who we have shared the information with
- How long we envisage holding your information

In order to maintain the security of your information, we will have to verify your identity before we provide you with a copy of the information we hold.

The first copy of your information that you request from us will be provided free of charge, if you require further copies we may charge an administrative fee to cover our costs.

7c) You have the right to correct any inaccurate or incomplete personal data

Where you have requested a copy of the information we hold about you, you may notice that there are inaccuracies in the records, or that certain parts are incomplete. If this is the case you can contact us so that we can correct our records.

7d) You have the right to be forgotten

There may be times where it is no longer necessary for us to hold personal information about you. This could be if:

- The information is no longer needed for the original purpose that we collected it for
- You withdraw your consent for us to use the information (and we have no other legal reason to keep using it)
- You object to us using your information and we have no overriding reason to keep using it
- We have used your information unlawfully
- We are subject to a legal requirement to delete your information

In those situations you have the right to have your personal data deleted. If you believe one of these situations applies to you, please get in touch with us. You have the right to have a copy of your data transferred to you or a third party in a compatible format.

8) Changes to our Privacy Policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

This version was last updated October 2018 and historic versions can be obtained by contacting us.

9) Complaints

If you wish to make a complaint about our collection or use of your personal data, please contact us in the first instance so that we may seek to resolve your complaint.

You have the right to lodge a complaint with the Information Commissioner's Office (ICO), the statutory body which oversees data protection law in the UK. Please visit the ICO website if you wish to lodge a complaint with the ICO.

10) Contact Details

Our contact for data protection is Chair of Trustees, who can be contacted using the details below:

In the event of any query or complaint in connection with the information we hold about you, please use the contact -mail address on <http://www.kingfishersc.org/contact.html>

11) Version V1.0 May 2018