

# Edinburgh Synchro Privacy Notice 2022



## What we need

Edinburgh Synchronised Swimming Club (Edinburgh Synchro) is a synchronised swimming club, affiliated to Scottish Swimming and British Swimming.

Edinburgh Synchro will be a “controller” of the personal information that you provide to us via forms, emails and our website.

When you register as a member of Edinburgh Synchro or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following personal information:

- contact details – name, address, email address, date of birth, emergency contact information
- membership criteria / category – swimmer or volunteer
- medical details – Doctor’s name, address and telephone number
- health details and dietary requirements – information that may impact your training and/or volunteering
- experience information – Scottish Swimming membership number, previous synchronised swimming experience
- PVG membership information, if required

## Why we need your personal information – contractual purposes

We need to collect our members’ personal information so that we can manage your membership and provide the services you are signing up to when joining the club. We will use our members’ personal information to:

- provide you with core member services, including training based on your age and ability, registering you with Scottish Swimming and PVG checks
- send you membership communications in relation to essential membership services including but not limited to, Annual General Meeting notices, membership renewals and membership fee information

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above membership services and benefits.

## Why we need your personal information – legitimate purposes

We also process our members’ personal information in pursuit of our legitimate interests to:

- promote and encourage your participation in synchronised swimming by sharing your data with coaches, team managers and/or members of the committee so that they can contact you about your training, send member communications and send details of upcoming competitions and events

- provide competition and events in synchronised swimming by accepting and managing entries for competitions, checking your personal information to ensure you are entered into the correct category and sharing your data with those necessary to be able to take part. Competitions and events may be filmed or photographed 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
- monitor and develop participation in synchronised swimming by monitoring members' engagement and participation in competitions, camps and grade assessment days and inviting our members to participate in surveys for research and development purposes
- invite our members as guests to our annual awards night, which includes asking our members to nominate individuals for awards and shortlisting such individuals to select the winners
- develop and maintain our members' qualifications, 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 / child protection requirements
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to synchronised swimming. We will use your personal information to investigate your complaint, to suspend membership and take disciplinary action where appropriate
- For volunteers who work with the swimmers, we will need to collect personal information relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This information will include your PVG certificate number, PVG membership number, date of issue and any relevant information in relation to your membership of the PVG Scheme. If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable information to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults

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 on [EdinburghSynchroSecretary@gmail.com](mailto:EdinburghSynchroSecretary@gmail.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.

#### **Why we need your personal information – legal obligations**

We are under a legal obligation to process certain personal information relating to our volunteers who work with the swimmers for the purposes of complying with the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults.

#### **Why we need your personal information – special category data**

We also process our members' personal health and wellbeing information in pursuit of our legitimate interests to ensure that you receive coaching that takes into consideration any health issues you may have, and to allow safe running of training sessions, camps, competitions and events. Processing is carried out on condition that it relates solely you and those you have regular contact with and your personal data will not be disclosed outside Edinburgh Synchro without your consent.

### **Other uses of your personal information**

We may ask you if we can process your personal information for additional purposes, for example sending promotions or information regarding outside synchronised swimming camps and opportunities. Our lawful basis for processing data is consent. Therefore, we will also need explicit consent from you to process this data.

On occasion we may collect personal data from non-members, for example a non-member participant who fills in a health disclaimer or form at a taster event. This information will be stored for two weeks 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 club has the following social media pages – Facebook, WhatsApp, Twitter and Instagram. All members are free to join these pages. If you join one of the Social Media pages, please note that providers of the social media platforms have their own privacy policies and that Edinburgh Synchro does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on the club social media pages.

### **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 Scottish Swimming, including all affiliated groups, for promotional and/or journalistic purposes.

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.

We may share personal information with our professional and legal advisors for the purposes of taking advice.

We may share personal information to providers of travel and training camp facilities for the purposes of booking travel and accommodation for camps and competitions.

In the event that we do share personal information with external third parties, we will only share such personal information 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.

As an affiliated club of Scottish Swimming we are required to ensure that all of our members are members of Scottish Swimming as a condition of our affiliation.

We will share your name, address, date of birth, phone number, emergency contact details and results of competitions and grade assessment days with Scottish Swimming who will become a controller of your personal information when they receive it. Scottish Swimming's privacy notice explains how they use your personal information and can be accessed here <https://www.scottishswimming.com/membership/data-protection.aspx>.

We publish the results of our competitions and details of club events on our website. This includes the competitors' name, age group category and result.

### **How we protect your personal information**

Your personal information is stored on committee members' computers and on DropBox, and our servers are based in the EU. The data is accessed and shared via Dropbox, email and WhatsApp by our volunteers for the purposes set out above.

We may be required to transfer your personal information outwith the EU for the purposes of entering athletes into competitions, booking travel arrangements for training camps, etc. Where your personal information is transferred outwith the EU, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

### **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 delete your personal information where you have not renewed your membership with us for two years.

We will keep certain personal information of members for longer in order to confirm your identity and when you were a member of Edinburgh Synchro. We need to do this in the event of a claim against Edinburgh Synchro.

We keep all our swimmers' results information so that we maintain an accurate record of the club's results.

### **Your rights**

You can exercise any of the following rights by writing to us at [EdinburghSynchroSecretary@gmail.com](mailto:EdinburghSynchroSecretary@gmail.com).

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 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 your personal information, you may request that we do so

Any requests received by Edinburgh Synchro 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](http://www.ico.org.uk).

## **COVID-19 Update:**

As a result of the worldwide Coronavirus pandemic, we may need to record information regarding whether you are displaying from any symptoms of COVID-19, have been in recent contact with anyone who has tested positive or is displaying symptoms of COVID-19, have any underlying health conditions or have, or are in close contact with anyone who has, been advised to shield. This information would be required to ensure the safety of members attending Edinburgh Synchronised Swimming Club.

### **Why we need your data**

Our lawful basis for processing health information relating to COVID-19 is:

- to protect your vital interests; and/or
- for the legitimate interests of members attending Edinburgh Synchronised Swimming Club to ensure individuals' safety and prevent the spread of the virus.

As health information falls within the definition of "special categories of personal data" under applicable data protection legislation, we also need a special condition to process such information. We may need to process this health information:

- to protect your vital interests where you cannot consent;
- for reasons of public interest in the area of public health, including protecting against serious cross-border threats to health where we have a legal duty of confidentiality to you; and/or
- with your explicit consent (if required).

### **Information we may collect about you**

We may collect data from you in relation to COVID-19:

- From a return to water self declaration and/or a regular health check survey – detailing whether you have symptoms of COVID-19, if you have come into contact with someone with COVID-19, history of having COVID-19, and underlying health conditions.
- Should you report contracting COVID-19 through to the COVID Officer or Club Committee Member.

### **Who we share your personal data with**

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with public health obligations. In the event that we do share personal information with 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.

Where a case of COVID-19 is recorded within the club, your personal information will not be shared with other members directly, however members will be advised that a case has occurred, whilst keeping personal information anonymous as far as possible.

### **How long will we store COVID-19 specific data?**

We will only keep your personal information for as long as necessary in line with legal obligations – laws or regulation may set a minimum period for which we have to keep your personal information.