



Portobello Amateur Swimming Club

Privacy Notice Policy

What we need

Portobello Amateur Swimming Club (PASC), are governed by the Scottish Swimming (SS), in addition we are also members of the East District region.

PASC will be a “controller” of the personal information that you provide to us via the initial membership form which you must fill in.

When you register as a member of PASC 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:

- name, address, date of birth of child/ phone number and email address of responsible adult
- equality information – for example, disability, etc.

Why we need your personal information – contractual purposes

We need to collect our members’ personal information so that we can manage your membership. We will use our members’ personal information to:

- send you membership communications in relation to essential membership services, including but not limited to training, social events, fundraising events, AGMs, membership renewals, membership fees’ information, etc.

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 benefit

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 participation in swimming and water polo by sending members’ communications and booking information for upcoming competitions and events. Our 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;
- provide competition in swimming and water polo by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
- monitor and develop participation in swimming and water polo by monitoring members’ engagement and participation through attendance and inviting our members to participate in surveys for researching and development purposes;
- invite our members as award winners or guests to our annual awards ceremony;
- develop and maintain our members’ qualifications, including sending email communications to members to inform you of upcoming courses, renewal



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requirements and verify that you have completed any mandatory training and PVG / child protection requirements; and

- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to swimming. We will use your personal information to investigate your complaint, to suspend membership, take disciplinary action where appropriate.

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 Portyascmembership@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.

Volunteers' personal data

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 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 Portyascmembership@gmail.com. If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to our swimming and non swimming members for the purposes of complying with our obligations under:

- 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;
- our SportScotland regulatory requirements to SS of how personal data is processed to comply with these obligations
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary; and

Other uses of your personal information



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We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

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 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 also share personal information with our professional and legal advisors for the purposes of taking advice.
- 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.
- Scottish Swimming 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](#).
- We publish the results of our competitions on our website. This includes competitors' name, age, and result.

How we protect your personal information

Your personal information is stored on our electronic filing system and our servers based in the UK, and is accessed by our staff / volunteers for the purposes set out above.

We are required to transfer your personal information outwith the EU for the purposes of for example, 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

Members' personal data

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 yearly membership with us.



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Your rights

You can exercise any of the following rights by writing to us at PASC

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; and
- if you wish us to delete your personal information, you may request that we do so.

Any requests received by PASC 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