

9. Kilmarnock Amateur Swimming Club Data Protection Statement

Kilmarnock Amateur Swimming Club agree to display consistently high standards of behaviour and appearance, dressing suitably and not displaying behaviour that is abusive or threatening to anyone in our sport or associated with Scottish Swimming.

The club accept that all club members will be held accountable for their behaviour and should anyone act abusively or threateningly, they will be subject to the consequences outlined in the Scottish Swimming Abusive and Threatening Behaviour Policy.

The club will not inappropriately discuss or transmit any confidential information*, either internally or externally, which may affect, harm or concern anyone in our sport or associated with Scottish Swimming.

Regardless of position within Scottish Swimming, members of the club understand and agree that all information and documentation that we will receive, gain access to or be exposed to during and related to our work may only be used for the purpose of which it was given and will not be disclosed without permission.

The club will never use other people's passwords to access personal information.

The Club also agree that they will not copy, or otherwise take, any confidential or sensitive documentation or written information from Scottish Swimming without express permission from the Chief Executive.

Regardless of roles voluntary or paid positions within Scottish Swimming, The Club further understand and agree that this confidentiality agreement continues after the end of our contract or affiliation with the Scottish Swimming.

The Club undertake to ensure all members keep up to date with other policies that may affect their position, such as Data Protection.

The Club understand that a breach of confidentiality on our part would be a breach of the Scottish Swimming policy. This may result in individuals being suspended by Scottish Swimming.

- Sensitive information or data – e.g. a Scottish Swimming related discussion/email about a challenge with a club or a particular member; a sensitive discussion about an ongoing child protection incident
- Personal information or data – e.g. member phone number or date of birth (unless permission to circulate has been secured)
- Financial information – e.g. sensitive facts and figures on a club account; a proposal for investment at the Council/Board level; staff salaries
- Commercial information – e.g. notification about a sponsor or product which is not for wider distribution
- Confidential documentation – e.g. Any documentation which has been marked "confidential", or which has been verbally tagged "not for circulation"
- Child Protection investigations or other information – e.g. any information relating to Child protection enquires at club, district or national level

Kilmarnock Amateur Swimming Club Privacy Notice

Kilmarnock Amateur Swimming Club (KASC) is a competitive swimming club that is run by a Committee of parent volunteers and is registered and supported by Scottish Swimming.

Kilmarnock Amateur Swimming Club will be a "controller" of the personal information that you provide to us unless otherwise stated. The swim software used to record and store member data is run by Team Unify and ultimately controlled by NBCUniversal, you can view their privacy policy on their website.

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

- Swimmer Name, D.O.B, Address, Gender, medical or dietary conditions & medication, Name and address of GP

- Parent/guardian Name, Email address, Contact telephone numbers (home, work and mobile)
- Emergency contact person and telephone number
- SASA membership ID -This data is also passed to Scottish Swimming, so each member is insured and a member of Scottish Swimming.
- Payment Information – card details are not stored by the Kilmarnock Amateur Swimming Club and are instead stored on the Team Unify system – we have no access to these details however we can view the last 4 digits of the stored card, the expiry date and the registered postcode.

When you volunteer with Kilmarnock Amateur Swimming Club such as committee member, Gala Official, coach, poolside helper, we may ask you for the following personal information depending on the position you are volunteering for:

- Contact details – name, address, email address, date of birth.
- You may be asked to join SASA (This data is then passed to Scottish Swimming)
- PVG Membership number and SASA Membership number
- Members asked to fill out PVG information or a self-declaration.

Why we need your personal information

We need to collect our members' and members' parent or guardian personal information so that we can manage your membership. We will use our members' personal information to:

- Provide core member services such as insurance with SASA.
- Provide coaches with parental contact, emergency contact and essential medical information.
- Send you membership communications by email, text, telephone in relation to essential membership services, including but not limited to, general meeting notices, membership renewals, membership fees' information, club news.

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

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

- Promote and encourage participation in swimming by sending members' communications and 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 by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category, invite our members as award winners or guests to our annual awards and other fundraising events.
- Develop and maintain our members' and members' parents' 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 swimming. We will use your personal information to investigate your complaint, to suspend membership, take disciplinary action where appropriate.
- Allow swimmers to be able to go on overnight stays and trips abroad. (For overnight stays and trips abroad, consent forms and additional information may be asked for).

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 by sending an email to the secretary of Kilmarnock Amateur Swimming club at secretary@kasc.club. 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.

For 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 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 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 secretary@kasc.club. 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 members, volunteers, parents, or guardians for the purposes of complying with our obligations under the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers can undertake regulated work with children.

Other uses of your personal information

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 for promotional and/or journalistic purposes if the appropriate consents are in place.

We may also share personal information with our professional and legal advisors for the purposes of taking advice. As an affiliated club of Scottish Swimming, we are required to ensure that all our members are members of Scottish Swimming as a condition of affiliation. We will share name, date of birth, gender, address, telephone, email 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 on their own website.

We may publish the results of our competitions on our website. This includes competitors' name, age and results on our social media page as well as provide to media outlets such as local press.

If 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.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include Disclosure Scotland and Police Scotland for the purposes of safeguarding children.

Fair processing notice regarding child wellbeing & protection

The GDPR requires that you are informed about how your personal information will be used. For the purposes of child wellbeing/child protection matters, the club may share information about you with Scottish Swimming where it has been alerted to circumstances that might affect your status as a member of the PVG scheme for regulated work with children and/or protected adults or your suitability to carry out the regulated work role for which you have applied/been appointed or already doing. In the event such sharing is deemed necessary, it will normally only be conducted between the registered Welfare Protection Officers in the Club and Governing Body.

If you have accessed our website

For security purposes we do collect some personal information about you, for example your IP address. This is so that we can block someone, only if needed, if they act or comment inappropriately.

How we use cookies

A cookie is a small file which asks permission to be placed on your mobile device or computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Overall, cookies help us provide you with a better website. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Giving us your information via our website

Sometimes we may ask you to provide us your personal information on our websites if you are requesting to contact us. When you use our contact form on our websites, we may require: your name, your email address and in some cases, your phone number. We will use this information:

- To carry out our obligations arising from any contracts entered into between you and us
- To notify you of changes to our services, and to provide you with support in using our services. If you contact us for support in using our website, and we may keep records of such contact.
- To provide you with information or services that you may have requested

The use and storage of any personal information within our websites will be based on legitimate interests. The legitimate interests we are pursuing are the operation of our websites and provision of our services.

You may object to us using your personal information for these purposes at any time by contacting us at secretary@kasc.club. We will retain this information only for as long as we require it for these purposes.

Security of our websites

Our website is designed, and maintained by the club's committee members who take the security of any personal information processed on their websites seriously. Each member of the committee is equally committed to information security and is responsible for their own systems to ensure the confidentiality, integrity and security of any personal data they process. 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.

Linking to other websites

Our website may, from time to time, contain links to websites of third parties. We may also share articles or features of our websites through other sites such as Facebook, YouTube or Twitter. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

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 1 year.

Your rights

You can exercise any of the following rights by writing to us at secretary@kasc.club

Your rights in relation to your personal information are:

- The right to be informed how your personal information is being collected, used, or stored by us. Scottish Swimming's Privacy Policy advises you of this.
- The right to access the personal information we hold which relates to you.
- The right to object to direct marketing by unsubscribing from it
- The right to object to processing conducted based on legitimate interests.
- The right to erasure of information we use or hold that relates to you.
- the right to data portability, so you can obtain or reuse your personal data for your own purposes across different services from one IT service to another in a safe and secure way.
- The right to have your data changed if it's inaccurate or incomplete.
- The right to have your data restricted or blocked from our processing.

Any requests received by Kilmarnock Amateur Swimming Club 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.

Changing this policy

We reserve the right to change this Privacy Notice from time to time and suggest therefore that you review it periodically. We will make sure that if we do change this policy then it will be in accordance with GDPR.

This version of the Privacy Notice was last updated on 02/02/2024