



General Data Protection Regulation (25/05/2018) / Data Protection Act 2018 (UK's implementation of GDPR) is designed to give increased privacy rights and power to individuals whose data is being collected by organisations.

GDPR requires that all data shall be:

- Used fairly, lawfully, and transparently.
- Used for specified, explicit purposes.
- Used in a way that is adequate, relevant, and limited to only what is necessary.
- Accurate and, where necessary, kept up to date.
- Kept for no longer than is necessary.
- Handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction, or damage.

We also need it to satisfy the following:

- Legitimate Interest - to send information on activities and events which have been arranged as part of membership.
- Contractual - to allow us to provide member services associated with the day to day running of the club and its activities such as requests for payments, admin charges, registers, and fees.
- Legal - to fulfil legal obligations for health and safety, insurance, and child protection/safeguarding purposes.

This policy is intended to inform and detail your rights:

- How your data is being used
- Access personal data
- How to correct / update data
- How to have your data erased
- How to stop / restrict the processing of your data - where certain conditions apply to have a right to restrict the processing of your personal data.
- Data portability - you have the right to have the data that the Camden Swiss Cottage Swimming Club hold about you transferred to another organisation.
- How you can object to how your data is processed in certain circumstances (e.g. Marketing)



Data at Camden Swiss Cottage Swimming Club (CSCSC)

- CSCSC collects personal data from members (including Parents and Guardians of minors) using forms completed by you on the Camden Swiss Cottage Swimming Club website. Data may also be provided by you in correspondence such as emails, contact us forms, or trial forms. This information collected is used to contact you only to provide information regarding club activities and/or for use in the event of an emergency.
 - As the person who creates the account and provides the data on the CSCSC website (hosted by SportsEngine), you can access your account and data using the login details you created.
- The following workforce and officers of the club have access to your personal data: Head Coach, Coaching Staff, Team Manager, Swimming Teachers, Welfare Officer, Committee Members including Chair, Vice Chair, Club Secretary, and Club Treasurer. The Office Manager has access to your personal data as well as financial billing summary.
 - Your bank account details are not requested or retained by the Office Manager, unless there is a credit due, and refund is to be arranged at your request.
 - No officer of the club has access or sight of any credit/debit card information. More information about SportsEngine's GDPR Compliance, Terms of Use and Subscription Agreements can be found within the Policies heading on the CSCSC website:
<https://www.camdenswimming.co.uk/page/manuals--policies/se-motion--stripe-card-terms>
- The data we collect for trialists is only through the CSCSC website using the Cognito Form platform. This data is deleted at the end of every swim season. The data we collect for members is only through the Sports Engine platform at www.camdenswimming.co.uk
 - Data required and stored pertaining to swimmer's includes swimmer name, date of birth, gender, physician name and contact details, medical information (if relevant), emergency contact information. The parent/guardian will input the swimmer's data as well as their own address, name, email address, phone number and where the swimmer is under 16 years, the parent's date of birth.
 - Data relevant for club membership includes club membership start/end date, Swim England membership number, Squad/Class group, attendance history, competition results, any additional comments, notes or information about a swimmer provided by the account holder (parent).
- Any data can be updated by the account holder / parent member. Alternatively, the member should contact the Office Manager to request their data to be corrected or updated.
- Members leaving CSCSC are required to give 1 month notice. The data will remain active for the final month, as the swimmer may continue to access training during this period and their information is required for both attendance and in the event of an emergency. At the end of the cancellation period, subject to the account balance being £0, the Office Manager will close the account and delete the card stored in the account.
 - At the end of every swim season (August), all cancelled accounts will have their data anonymised and deleted from SportsEngine platform / CSCSC website. Any cancelled member can instruct their data to be anonymised before the end of the season, by writing to the Office Manager, who will confirm their request. Once the data is anonymised, it cannot be recovered/restored.



- The data collected is used solely to operate the club squads and learn to swim programmes.
 - The SportsEngine platform enables swimmers and their parents / guardians to easily register for squads or class(es).
 - Within the squads' programme, this data is required for swimmers to sign up for and compete in meets, access swim times, attendance, and event management.
 - Within the learn to swim programme, this data is required for class registers, to record swimmer attendance, assessments, and emergency contacts.
 - Parents/Account holders' data is used for club communication and to access their personal billing summary, and other services they request.
 - CSCSC are required to have this data to meet legal obligations such as reporting and investigations under the Swim England's Wavepower (safeguarding policy and procedures). Also to comply with national and regional sports bodies' (e.g., Swim England) registration and membership requirements.
 - Those who register for a squads membership are required to agree to [Swim England's Privacy Policy](#) as their data will be passed on to the Swim England via their Online Membership System.
 - Wider operational purposes include: club record keeping, informing squad members of club events or galas/meets, to process competition entries, respond to enquiries or in the event of an emergency contact a parent/guardian or emergency contact.
- Those non-members who provide their details via the Trial Form or Contact Us Form will have their information passed on to the relevant club contact – generally the Team Manager, Stages Co-ordinator, Office Manager or Club Welfare Officer.

Camden Swiss Cottage Swimming Club will not disclose any personal information we collect about you to a third party without your consent, except:

- Where it is necessary to share with a service provider, such as SportsEngine who's platform is used to manage the membership of CSCSC. All details of what data is required for a CSCSC membership is detailed on Page 2.
- Where a parent/member registers for a squads membership. They are required to agree to [Swim England's Privacy Policy](#) as their data will be passed on to the Swim England via their Online Membership System.
- Where CSCSC has a legal obligation to disclose the information (such as responding to a court order), to protect Swimming Club's legal rights or to prevent fraud or illegal activity

In agreeing to this Privacy Policy, you are consenting to your personal data being processed by the Camden Swiss Cottage Swimming Club in the manner described above.

If you do NOT CONSENT to your personal data being processed in line with the Camden Swiss Cottage Swimming Club GDPR Policy, your data will be deleted and anonymised, in line with your Right to be Forgotten. You will be unable to be a member of the Camden Swiss Cottage Swimming Club.

Retention Policy

Camden Swiss Cottage Swimming Club will process personal data during the duration of your membership after which your data will be deleted. Camden Swiss Cottage Swimming Club will continue to store only the personal data needed to meet any legal or Swim England obligations. At the end of every swim season (August), all cancelled accounts will have their data anonymised and deleted from SportsEngine platform / CSCSC website. As part of the CSCSC Records, the club will continue to store individual's performance data which forms these records, again you have the right to request these results/times to be deleted from the club's records.



To access Personal data identification will be required. Requests should be made to GDPR, Camden Swiss Cottage Swimming Club by emailing accounts@camdenswimming.co.uk

Camden Swiss Cottage Swimming Club accepts the following forms of ID when information on your personal data is requested:

- Passport
- Driver's Licence
- Birth Certificate
- Utility Bill (registered address – dated within 3 months)
- A minimum of one piece of photographic ID listed above and a supporting document is required.

If the Camden Swiss Cottage Swimming Club is dissatisfied with the quality, further information may be sought before personal data can be released.

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

If you wish to make a complaint about how your personal data is being processed by the Camden Swiss Cottage Swimming Club, you have the right to complain. Please put this in writing to the club Chair at chair@camdenswimming.co.uk

All Camden Swiss Cottage Swimming Club policies are located under the Policies heading on the club website: www.camdenswimming.co.uk