



Northamptonshire Amateur Swimming Association

(Affiliated with Swim England East Midlands Region)

www.northantsasa.org

Privacy Policy

Introduction

We at Northamptonshire ASA, (“**we**” or “**our**” or “**us**”) want to make sure all the personal information we have collected about you, is safe and secure whether we collect it through our website at northantsasa.org (“**Site**”) or from other sources. This Policy set outs our commitments to you, in compliance with and beyond the General Data Protection Regulation (commonly known as the **GDPR**) and explains how we collect, store, and use your personal information.

Collecting specific, relevant personal information is a necessary part of us being able to provide, develop and support competitive swimming, open water, diving, synchronised swimming (synchro), water polo, masters, disability, and para swimming in Northamptonshire, to organise related events, provide you with services you may request from us or in providing services to others or just managing our relationship with you.

For the purpose of the data protection Act 2018 the data controller of any of your personal information is Northamptonshire ASA. (A data controller is a person who controls how personal information is processed and used).

We are not required to appoint a Data Protection Officer.

Contacting Us

Any questions regarding this policy, our privacy practices, query, or complaint should be sent to the county secretary @ northantsasasec@gmail.com

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

Depending on the type of membership you register for with us, you may initially provide us with, or we may obtain personal information about you, such as information regarding your:

- personal contact details that allow us to contact you directly such as name, title, email addresses and telephone and mobile numbers:
- date of birth.
- gender.
- membership of Swim England and/or a club or clubs.
- times performed in different events and competitions.
- references and other information included in a CV or cover letter or as part of the application process for selection for an event or competition.
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us.
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you.
- records of your attendance at any events or competitions hosted by us.
- images in video and/or photographic form and voice recordings.
- your marketing preferences so that we know whether and how we should contact you.
- identification documents such as passport and identity cards.
- details of any county membership.
- details of next of kin, family members, coaches, and emergency contacts.



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- records and assessment of any swimmer, player or diver, rankings, grading or ratings, competition results, details regarding events or competitions attended and performance (including that generated through pathway programmes);
- any disciplinary and grievance information.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store, and use the following 'special category data' about you:

- information about your race or ethnicity, religious beliefs, sexual orientation, and political opinions.
- medical information about you which is collected purely for the purpose of ensuring your health and safety when competing and which will not be transferred to any third party save as specifically authorised by you, or in a medical emergency.
- information about any relevant impairments that you may have.

We may not collect all the above types of 'special category data' about you however, if we do process such data, it will be on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis.
- it is necessary for the establishment, exercise, or defence of legal claims.
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or based on your explicit consent.

For volunteers we may also collect criminal records information from/about you, this will be completed using the Disclosure Barring Service.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardians permission beforehand whenever you provide personal information.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you apply to become a member of a club, when you take part in a competition controlled by us, when you work as a volunteer for us, or when you purchase products or services from us, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

In becoming a registered athlete, coach, official or volunteer, you will provide certain information to third parties including Swim England, Swim England East Midlands Region, Institute of swimming, and British Swimming. This information may be shared with us.

If you are providing us with details of referees, next of kin, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the "**Your rights in relation to personal information**" section below.



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4. HOW AND WHY YOUR INFORMATION IS USED

The table below describes the main purposes for which we process your personal information, the categories of your information involved and the lawful basis for being able to do this.

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

- Specific consent - where you have provided specific consent to us using your personal information in a certain way, such as to send you email or texts.
- Legitimate Interest - to send information on activities and events which have been arranged as part of membership.
- Performance of a contract - 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, registers, and fees.
- Legal obligation - to fulfil legal obligations for health and safety, insurance and child protection purposes.

Purpose	Personal information used	Lawful basis
To administer your entry into an event or competition and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you	All contact and competitor details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your entry into an event or competition with us.
To arrange and manage any contracts for the provision of any services or products	Contact details, transaction, and payment information. Records of your interactions with us.	This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have purchased from us.
To send you information, which is relevant to your event or competition, including details about advanced ticket information, competitions and events, partner offers and discounts and any updates	Contact details.	This is necessary to enable us to properly manage and administer your entry into an event or competition with us
To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events, products, and information about our commercial partners	Contact details and marketing preferences.	Where you have given us your explicit consent to do so.



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To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you.
Retention of records	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records to properly administer and run our organisation and in some cases, we may have legal or regulatory obligations to retain records.
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our events and competitions is targeted and relevant.
For the purposes of promoting Northamptonshire County ASA, our events, and competitions.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements	Records of attendance. Membership & contact details. Special Category Information.	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport. We process special category personal data based on the "special category reasons for processing of your personal data" referred to in section 2 above.
Ensuring the safeguarding and welfare of all participants in relation to medical history	Contact and membership details. Special category information. DBS information	As Above



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<p>To arrange for any trip or transportation to and from an event</p>	<p>Identification documents, Emergency contacts, transaction and payment information, Special category information</p>	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.</p> <p>We process special category personal data based on the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p>To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.</p>	<p>Health and medical information.</p>	<p>We process special category personal data based on the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p>To maintain contract requirements for employed members</p>	<p>Contract of employment</p>	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data based on the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p>For the purposes of equal opportunities monitoring and registering members for country of representation</p>	<p>Contact and membership details. Special category information. DBS information</p>	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</p> <p>We process special category personal data based on the “special category reasons for processing of your personal data” referred to in section 2 above.</p>



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5. DIRECT MARKETING

Email, post, and SMS marketing: from time to time, we may need to contact you by email, post, or SMS with information about our products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set.

You can let us know at any time that you do not wish to receive marketing message by contacting us as above.

We do not pass on your personal information to third parties for the purposes of direct marketing.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

Personal information may be shared with the following:

- Any party approved by you.
- To the governing body (Swim England) or regional body to allow them to properly administer the sport on a local, regional, and national level.
- Other service providers and advisors: for example, email marketing specialists, payment processes, professional advisors, data analysis and IT services (including CRM, website, video and teleconference services);
- External funding providers.
- Our Partners and Activity Providers.
- The Government or our Regulators: where we are required to do so by law or to assist with their investigations or initiatives.
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.
- In addition to this, any event which you enter may process and hold personal data which is required in order for you to participate.

This policy does not cover how your data is processed in relation to external bodies.

7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

Your personal information is not transferred to and stored in countries outside of the UK and the European Union.

8. RETENTION OF PERSONAL INFORMATION

The duration for which personal information is retained will differ depending on the type of information and the reason why it is collected from you. However, in some cases personal information may be retained on a long-term basis; for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirements, we retain all physical and electronic records 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 which may be retained until the limitation period for those types of claims has expired.



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For personal injury or discrimination claims this can be an extended period as the limitation might not start to run until a long time after the event.

- We will continue to store individuals' performance data which form part of Northamptonshire County ASA competitive records.

It is important to ensure that the personal information we hold about you is accurate and up to date, and you should let us know if anything changes, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you through the 'Contact Us' details given above.

9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- The right to be informed about how your personal information is being used.
- The right to access the personal information held about you.
- The right to request the correction of inaccurate personal information held about you.
- The right to request the erasure of your personal information in certain limited circumstances.
- The right to restrict processing of your personal information where certain requirements are met.
- The right to object to the processing of your personal information.
- The right to request the transfer of elements of your data either to you or another service provider.
- The right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them, and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some rights have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>

To exercise any of the above rights, or if you have any questions relating to your rights, please 'Contact Us' by using the details given above.

If you are unhappy with the way, we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

10. CHANGES TO THIS NOTICE

This privacy notice may be updated from time to time. When a change to this notice is made in a material way, the version date at the bottom of this page will be updated. For significant changes to This notice, reasonable notice will be given 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.



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Document Control Log

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1.0	June 2023	Created	Joanne Laidlaw – Assistant Chairman