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|  | **CALDAY GRANGE ADULT LANE SWIMMING CLUB**  **DATA PROTECTION POLICY**  **Version 1**  **5th June 2023** |

**INTRODUCTION**:

The Data Protection Act 2018 controls how your personal information is used by organisations and is the UK’s implementation of the EU’s General Data Protection Regulations (GDPR). Everyone responsible for using personal data has to follow strict rules called ‘data protection principles’.

Organisations must make sure the information is:

• Used fairly, lawfully and transparently.

• Used for specified, explicit and legitimate 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.

Calday Grange Adult Lane Swimming Club (CGALSC) is committed to respecting your privacy. This notice explains how we may use personal information we collect before, during and after your membership with us and applies to you if you have registered to become, or are already a member of the club. It also explains how we comply with the law on Data Protection, what your rights are and how your information is controlled by CGALSC Committee.

All further references to we, our or us in this Policy Document, refer to CGALSC.

This notice applies to everyone who has registered to become, or are, a member of our club. It explains:

• How we may use the personal information we collect before, during and after your membership with us.

• What your rights are for the purposes of data protection.

• How we comply with the law on data protection.

• What your rights are.

For the purpose of the Data Protection Act 2018, the Data Controller of any of your personal information is CGALSC. We are not required to appoint a Data Protection Officer.

In the event of any query or complaint in connection with the information we hold about you, in the first instance, please contact the Membership Secretary Chris Lumb; email [CGALSCMembership@outlook.com](mailto:CGALSCMembership@outlook.com) Mobile; 07881646169.

**PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

1. 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 numbers.
* Membership beginning and end date.
* Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us.
* Minimal payment details you provide, such as on a cheque, Bank Statement or Standing Order References to our bank, so that we can receive payments from you and details of the financial transactions with you.
* Records of your attendance at Lane Swimming sessions.
* A photographic image of you, in order to raise your Membership Card and file alongside your application form.

1. In most cases, you will have a legal, contractual or other requirement or obligation, to provide us with your personal information. If you do not provide us with the requested personal information, we may not be able to admit you as a member. Or we may not be able to properly perform our contract with you, or comply with legal obligations.
2. 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 & Safety.

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| **PURPOSE** | **MEMBERSHIP PERFORMANCE** | **LEGAL OBLIGATIONS** | **LEGITIMATE REASONS** | **PERSONAL INFORMATION USED** |
| Administer membership and maintain relationship | X |  | X | Contact and membership details, transaction and payment information, records of your interactions with us. |
| Marketing Information - Updates on swimming |  |  | X | Contact and membership details, marketing preferences |
| To deal with queries or complaints | X |  | X | Contact details, records of your interactions with us. |
| Retention of records | X | X | X | All the personal information we collect. |
| Data analytics - record keeping, research and analysis |  |  | X | Records of attendance. |
| To comply with health and safety requirements | X | X | X | Contact and membership details. Special category data. |

1. Where you have given us your consent to use your personal information in a particular manner, you also have the right to withdraw this consent at any time.
2. However; the withdrawal of your consent will not affect any use of the data we hold on you that was made before you withdrew your consent. We also may still be entitled to hold and process the relevant personal information we have on you after you withdrew your consent, so we can answer any queries or complaints that you may have made. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you, such as accepting your application for membership.

**CONTACTING YOU DIRECT / MARKETING**

* 1. We may contact you by email, post or by SMS from time to time about CGALSC. This will only be to ensure that you are kept fully up to date in all and any matter that may affect your membership. Such as Pool Closures or a change to the timetable(s).

2. In the very rare circumstance there is a Marketing Product or Service we think you may benefit from or be interested in; we may contact you about this. You can of course opt out if you so wish, by emailing the Club Secretary or Membership Secretary.

**DISCLOSURE OF YOUR PERSONAL INFORMATION**

We may share your personal information with the following parties:

* CGALSC Committee.
* The Pool Manager & Staff.
* Any party approved by you.
* The Swimming Pool Trust Committee.
* The Government and their organisations; where we are required to do so by law or to assist with their investigations.
* Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

**HOW LONG DO WE KEEP PERSONAL INFORMATION**

1. The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. Generally, where there is no legal requirement, we will destroy all physical and electronic records immediately as we have no legal requirement to keep them.
2. However, information that may be relevant to Health & Safety, or for other legal or lawful purposes, may be retained until the limitation period for such types of claims to be resolved. This can be an extended period as the limitation period might not begin for a considerable time after the event.
3. We may also have to retain information or hand it to Government or Police agencies, where we are legally obliged to do so, so they can carry out any investigation or enquiries.

4. It is imperative that the personal information we hold about you is accurate and up-to-date. Therefore, you ***MUST*** inform the Membership Secretary of ***ALL***, for example; changes to telephone number(s), or email addresses.

**YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

* 1. 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 we hold about you.
* The right to request the correction of inaccurate personal information we hold about you.
* The right to have your personal information deleted 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 that we transfer 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.
  1. 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/>.
  2. To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out below.
  3. 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. Nonetheless, we are here to help and encourage you to contact us to resolve your complaint first.

**CHANGES TO THIS NOTICE**

1. We may update this privacy notice from time to time. When we change this notice in a material way, we will update you and change the Policy Version Number and Date at the bottom of this page.
2. For significant changes to this notice, we will try to give you as much reasonable notice as we can.
3. Where required by any changes to the Law, we will contact you and seek your consent to changes in the way we use your personal information, as is required.

Chris Lumb

Membership Secretary

cgalscmembership@outlook.com