

St Edmundsbury Life Saving Club Privacy Policy

We are committed to respecting your privacy. This policy explains how we may use the personal information we collect before, during and after your membership with us. This policy applies to you if you have registered to become or are a member of our club, and explains how we comply with the law on data protection, what your rights are and, for the purposes of data protection, that we will be the controller of any of your personal information.

References to **we, our, us** or **the club**, in this privacy policy are to the **St Edmundsbury Life Saving Club**.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Club Committee has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this notice.

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:

- o personal contact details that allow us to contact you directly such as name, email addresses and telephone numbers;
- o date of birth;
- o emergency contacts;
- o medical and learning information relevant to the activities undertaken;
- o images in video and/or photographic form;
- o records and assessment of any activity, training, awards and competition results.

2. WHERE WE COLLECT AND STORE YOUR INFORMATION

We normally collect personal information about you when you apply to become a member of the club, on our membership application forms which are completed annually. Additional information may be collected when there is any change in your circumstances or recorded during attendance at any of the club's activities. Your information may be stored on:

- o paper application forms, lists or registers;
- o hard copy newsletters and prints (images);
- o electronically on password protected personal computers owned and used solely by club officials;
- o electronically on cd or memory stick (images).

When not in use, your stored information will be kept locked securely in a club official's house.

3. USES MADE OF THE INFORMATION

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

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and manage our relationship with you, including dealing with membership, class, award or clothing payments and any support or enquiries made by you.	All contact and membership details.	This is necessary to enable us to manage and administer your membership properly.

To send you information about membership and the club, including newsletters, details about events and competitions.	Contact and membership details.	This is necessary to enable us to manage and administer your membership properly.
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 in case there are any issues with your membership.
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 in order to administer and manage your membership properly and run our club, and in some cases we may have legal or regulatory obligations to retain records.
To conduct data analysis to understand event attendance and trends within the sport.	Records of your attendance at any activities, events or competitions we host.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the club, our events and membership.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
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 activities.	Medical and learning information.	This is necessary to ensure your participation in club activities in a safe and appropriate way, and will be treated in the strictest confidence.

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 provide the services you registered for in a safe and appropriate manner and we may have to terminate your membership.

Where you have given us your consent to use your personal information in a particular manner (eg Use of Photography), you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note, however, that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent.

4. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- Our club trainers and officials to administer training sessions, lessons, awards and other activities;
- Fellow club members and their families on programmes, result sheets and celebrations of achievements;
- Facility providers to allow safe access or check required competency standards;
- The RLSS, other awarding bodies or competition providers for entry into external events or activities.

5. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

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. 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 requirement, we retain all paper and electronic information for a period of **six years** after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding unsuccessful membership applicants where we hold records for a period of not more than **12 months**;
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event;
- Competition results and awards achieved information, including names and dates, as well as trophies displaying names will be stored for as long as considered necessary to preserve the history of the club.

Paper-based information will be destroyed by cross-shredding or incineration. Electronic data will be deleted permanently from all computers.

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 can contact us by using the details set out in the "**Contacting us**" section below.

6. **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 we hold about you;
- the right to request the correction of inaccurate personal information we hold 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 that we transfer elements of your data either to you or another service provider; and
- 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 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 set out in the "Contacting us" section below.

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.

7. CHANGES TO THIS NOTICE

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.

8. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please speak to any of the club committee members or email info@stedmundsbury-lifesavers.org.uk .

Version dated March 2019