



DATA POLICY

Aberdeen Amateur Swimming Club Aberdeen Learn to Swim Scheme

Scope

Aberdeen ASC and LTS [**"AASC/LTS"** or **"the Club/Scheme"**] protects the privacy of its athletes, swimmers, lifesavers, parents, teachers, coaches, teaching assistants, volunteers and workers. This Data Policy, in conjunction with the Club/Scheme's Privacy Statement, explains how AASC/LTS complies with the General Data Protection Regulation [**"GDPR"**].

This Data Policy does not cover anything that is otherwise covered in either the Club/Scheme's Privacy Statements or in the GDPR itself.

AASC/LTS may process personal data without individuals' knowledge or consent, in compliance with its Privacy Notices, where this is permitted or required by law.

AASC/LTS reserves the right to update this Data Policy as required.

Key definitions

"Data processing" is any activity that involves the use of personal data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring personal data to third parties.

"Personal data" are data that identify a living person to whom the data relates or that relate to an identifiable living person.

"Special category data" are particularly sensitive data including data related to physical or mental health conditions, sexual life, biometric parameters etc.

Registration with Information Commissioner's Office [**"ICO"**]

It is AASC and ALTS' understanding that, as non-profit making organisations, neither entity is required to register with the ICO.

Data protection champion

AASC/LTS will be a **"Controller"** of the personal data that data subjects provide. In circumstances in which it is necessary to disclose personal data to a third party, that third party becomes the controller of the data.

AASC/LTS will have a data protection champion who will:

- Act as a focal point for the provision of information and advice,
- Arrange for the data register to be reviewed every two years,
- Maintain the currency of Privacy Statements and the Data Policy,
- Ensure third party processing agreements are in place where required,
- Respond to requests by data subjects to exercise their rights under the GDPR, and
- Record and report data breaches.

The Data Protection Champion will maintain an email address specifically for this purpose: aasc.dataprotection@gmail.com.



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The Data Protection Champion is answerable to the AASC/LTS Committee on all matters relating to data protection.

Communication

All members of AASC/LTS will be provided with the appropriate Privacy Statement on joining.

The Privacy Statement and Data Policy will also be accessible in the Club/Scheme's Handbook and on the Club/Scheme's website(s).

A link to the Privacy Statement will be included in the email signatures of AASC/LTS committee members.

Security

Confidentiality:

- All processors of Club/Scheme members' data must take confidentiality and security seriously and not disclose personal data other than in a fair and lawful manner and as is required by their role within the Club/Scheme. Any queries or concerns should be addressed to the Club/Scheme's data protection champion.

Email:

- All Committee Members shall use a dedicated email address for Club/Scheme purposes that (1) is not accessible by any other person including family members, (2) may be handed on to their successor on termination of their appointment and (3) contains a signature which includes a link to the Club/Scheme's Privacy Statements.
- All other processors of Club/Scheme members' data should use an email address that is not accessible by any other person including family members.
- Processors who regularly process special category data (e.g. health data) should disable the autofill function for email addresses to prevent accidental forwarding to the wrong recipient.

PC/Mac:

- All PCs/Macs used by processors must have a login system that prevents unauthorised or unsupervised access. Passwords should be strong, not easily guessed and changed from time to time.
- All PCs/Macs used by processors must run a recognised anti-virus and security programme which is regularly updated.

Electronic storage:

- Back up devices such as pen drives should be encrypted.
- Cloud storage systems must have a login system that prevents unauthorised or unsupervised access.

Hard copy records:

- Hard copy records that include special category data, child/wellbeing protection data or banking details should be kept in a locked cabinet when not in use.



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Transfer of data outwith the European Union:

- No personal data may be transferred outwith the European Union without first consulting the Club/Scheme's Data Protection Champion.

Fraud, phishing etc.:

- Bank details must not be changed without making an independent verification that any email request to do so has truly originated with the member (i.e. do not use 'reply' when verifying).
- Care should be taken when opening attachments and clicking links to prevent the downloading of malware.

The rights of individual data subjects

Data subjects have the following rights:

- To be informed about how, why and on what basis AASC/LTS processes their data,
- To access their data by making a data subject access request,
- To have personal data corrected if it is inaccurate or incomplete,
- To have personal data erased if it is no longer necessary for the purpose for which it was originally collected/processed, or if there are no overriding legitimate grounds for the processing,
- To object to the Club/Scheme processing their data,
- To restrict processing of personal data where the accuracy of the data is contested or the processing is unlawful,
- To restrict processing temporarily pending verification of accuracy or consideration of objections, and
- To be provided with their data on leaving AASC/LTS.

Requests to exercise any of these rights should be referred to the Data Protection Champion for consideration under the relevant legislation and action.

Any Data Subject who remains dissatisfied may raise a complaint with the ICO at www.ico.org.uk.

Data breaches

Data breaches may take many forms, including:

- Loss or theft of data or equipment on which personal data is stored,
- Unauthorised access to or use of personal data,
- Loss of data resulting from an equipment or systems failure,
- Human error, such as accidental deletion or alteration of data,
- Poor email etiquette including sending an email to the wrong recipient, failing to remove an email chain containing special category data or switching subject matter mid-chain,
- Hacking, viruses or phishing scams, and
- 'Blagging' offences where information is obtained by deception.

All breaches must be reported to the Data Protection Champion within 24 hours.

The Data Protection Champion will:



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- Alert the Committee,
- Make the required report to the ICO without undue delay and, where possible, within 72 hours of becoming aware of it, if it is likely to result in a risk to the rights and freedoms of individuals, and
- Notify the affected individuals (or their parent or carer if under 16) if the breach is likely to result in a high risk to their rights and freedoms and notification is required by law.