



PRIVACY NOTICE

Aberdeen Amateur Swimming Club

Aberdeen ASC [“**AASC**” or “**the Club**”] protects the privacy of its athletes, parents, coaches, volunteers and workers. This Privacy Notice, in conjunction with the Club’s Data Policy, explains how AASC complies with the General Data Protection Regulation [“**GDPR**”].

AASC comprises the Competitive, Masters, Junior Masters and Waterpolo squads. Members of Aberdeen Learn to Swim [“**ALTS**”], Junior and Senior Fitness or Lifesaving section, should refer to the separate Privacy Statement for ALTS.

AASC will be a “**Controller**” of the personal data that you provide to us. 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 may process personal data without individuals’ knowledge or consent, in compliance with this Privacy Notice, where this is permitted or required by law.

AASC reserves the right to update this Privacy Notice providing such changes are appropriately communicated. AASC may also notify its athletes, parents, coaches, volunteers and workers in other ways from time to time about the processing of their personal data.

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.

Fair processing of data

In processing individuals’ data AASC will adhere to the following principles. Personal data will be:

- Used lawfully, fairly and in a transparent way,
- Collected only for valid purposes that are clearly explained and not used in any way that is incompatible with those purposes,
- Relevant to specific purposes and limited only to those purposes,
- Accurate and kept up to date,
- Kept only as long as necessary for the specified purposes, and
- Kept securely.

AASC may process special categories of personal data in the following circumstances:

- In limited circumstances, with explicit written consent,
- In order to meet legal obligations,



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- When it relates to personal data which are manifestly made public by the individual to whom the data relates,
- When it is necessary for the establishment, exercise or defence of legal claims,
- When it is needed for reasons of substantial public interest, and
- When it is needed for the purposes of preventive medicine or for the assessment of working capacity.

In particular, data about athletes' physical or mental health, or disability status, may be used to ensure health and safety and to assess fitness to train and compete, to provide appropriate adjustments, and to monitor and manage sickness absence. Data about coaches and volunteers' physical and mental health, or disability status, may be used to ensure health and safety, to assess fitness to work and to provide appropriate adjustments, and to monitor and manage sickness absence.

Consent to processing of personal data

AASC does not require consent from swimmers, parents, coaches, volunteers or workers to process most types of personal data.

In limited circumstances, individuals may be asked for written consent to processing. In those circumstances, full details of the information that is sought will be provided and the reason it is needed, so that individuals may carefully consider whether to consent. It is not a condition of membership that individuals agree to any request for consent.

Where individuals have provided consent to the collection, processing and transfer of personal information for a specific purpose, they have the right to withdraw consent for that specific processing at any time.

What personal data we need

AASC is affiliated to Scottish Swimming / the Scottish Amateur Swimming Association ["SS/SASA"]. All swimmers, at least one parent of each swimmer under the age of 16, coaches and certain volunteers and workers are all required to also be members of SASA.

When you register as a member of AASC or renew your membership (including if you are registering or renewing on behalf of a child under the age of 16), we will ask you for the following personal data:

- Name, address, email address, contact telephone number,
- Gender and date of birth (for athletes),
- Emergency contact details,
- Participation and membership category details i.e. whether you are an athlete, a parent, a coach, a volunteer or other worker,
- Your SASA number if you have one, and
- Any health information that is relevant and necessary to protect your interests if you are an athlete.



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We will ask you for the following additional data if you are joining AASC as a Coach or Coaching Volunteer:

- Details of relevant qualifications and experience,
- Details relating to your status under the Protection of Vulnerable Groups Scheme and your Safeguarding status, and
- Details of referees, if required.

We will record your start date with the Club and, throughout your membership of AASC, we may collect additional data as is appropriate to your position, as follows:

For athletes:

- Your squad,
- Your training history,
- Your times history,
- Your clothing size,
- Details of meet entries and acceptance status,
- Your Certificate of Disability [**"COD"**] or International Paraswimming Certificate [**"IPC"**] if appropriate, and
- Video footage of your stroke.

For coaches and volunteers:

- Such data as is required for the completion of a Disclosure check under the PVG scheme,
- Swimming Technical Official [**"STO"**] qualification level,
- Details of your attendance, absences and reasons,
- Your Continuing Professional Development [**"CPD"**] record,
- Your bank details, hours worked and pay rate (if appropriate), and
- (For committee members) your occupation and status.

Other data that may be collected and retained are:

- Photographs of members,
- Details of AASC's successes that may refer to individual Club members,
- Details of any safety cases or incident records,
- Details of disciplinary and capability records,
- Grievance and complaint records, and
- Details of any child or other vulnerable person protection issues that may arise.

From time to time, such as for team travel events, AASC may collect additional data in which case a separate Privacy Notice will be issued relating to that data.

AASC also acts as processor for the data of non-members who may enter competitions or volunteer at events organised by AASC.



Why we need your personal data – contractual purposes

We need to collect our members' personal data so that we can manage your membership. We will use our members' personal data to:

- Provide you with core member services, including assisting you to register with SS/SASA if required through SASA's membership system Azolve, providing you with coaching and competitive or developmental opportunities and enabling you to purchase club kit and equipment,
- Send you membership communications by email in relation to essential membership services, including but not limited to general meeting notices and voting arrangements, membership renewals, membership fees information, etc.,
- Fulfil our duty of care to you, and
- Collect payments.

If you do not provide us with all of the personal data that we need to collect then this may affect our ability to offer the above membership services and benefits.

If you are a coach or other worker, we will use your personal data to pay you.

Why we need your personal data – legitimate interest

We also process our athletes, parents, coaches, volunteers or workers' personal data in pursuit of our legitimate interests to:

- Promote and encourage participation in aquatic sports by sending members communications related to upcoming competitions and events and celebrating the outcome of events - our competitions and events may be filmed or photographed and your personal data may also be used in images captured from our or others' competitions and events, or from training, which we use for promotional, team building, celebratory and developmental purposes including on social media,
- Provide competition in aquatic sports by accepting and managing entries for our competitions, checking your personal data to ensure you are entered into the correct category, seeking volunteers or STOs and sharing the results,
- Monitor and develop participation in aquatic sports by monitoring members' engagement and participation through attendance records and inviting our members to participate in surveys for research purposes,
- Promote involvement in the Club and celebrate success by inviting our members to social events and by identifying award winners for recognition at our annual awards event - our social and awards events may be filmed or photographed and your personal data may be used in images captured at such events, which we use for promotional, team building and celebratory purposes including on social media,
- Ensure our coaches and other workers are suitably qualified for their roles,
- Develop and maintain our members' qualifications, including sending email communications to members to inform you of upcoming courses and renewal requirements, and verify that you have completed any mandatory training and PVG / child/wellbeing protection requirements,



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- Respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations and to deal with such disciplinary, capability, grievance or complaint issues that may arise,
- Respond to any child/wellbeing protection incidents that may arise, including notifying external authorities such as Police Scotland or Social Services where the Club's Child Protection Officer considers this to be in the best interests of a child or other vulnerable person or to protect the Club's reputation.

We may need to collect personal data relating to criminal convictions or alleged commission of criminal offences where you are required to complete a PVG check under the Protection of Vulnerable Groups (Scotland) Act 2007. This data will include your PVG certificate number, PVG membership number, date of issue and any relevant data in relation to your membership of the PVG Scheme.

If your PVG certificate is not clear, we will have a legitimate interest to collect references and any other applicable data to allow us to consider whether or not you can volunteer in a regulated role with children and/or vulnerable adults.

Where we process your personal data in pursuit of our legitimate interests, you have the right to object to us using your personal data for the above purposes. If you wish to object to any of the above processing, please contact us at aasc.dataprotection@gmail.com. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a member.

Why we need your personal data – legal obligations

We are under a legal obligation to process certain personal data relating to our athletes, parents, coaches, volunteers and workers for the purposes of complying with our obligations under:

- The Companies Act 2006, to maintain a register of our members, which includes our members' name, address, the date they were admitted to membership and the date on which they ceased to be our member, and hold general meetings, including issuing notices and voting arrangements,
- The Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers are able to undertake regulated work with children and vulnerable adults,
- The Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary, and
- Relevant health and safety legislation under which we fulfil our duty of care to you.

Other uses of your personal data

We may ask you if we can process your personal data for additional purposes, for example in the event of team travel to an event or camp. Where we do so, we will provide you with an additional privacy notice with information on how we will use your data for these additional purposes.



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Who we share your personal data with

If your personal data is included in any images or videos taken by us at our competitions and events, we may share this with SS/SASA or post on social media for promotional and/or journalistic purposes.

We may be required to share personal data with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, Social Services and Police Scotland for the purposes of reporting accidents and safeguarding children and other vulnerable persons.

We may also share personal data with our professional and legal advisors for the purposes of taking advice.

Aberdeen ASC employs third party suppliers to provide services, including financial audit services. These suppliers may process personal data on our behalf as “processors” and are subject to written contractual conditions to only process that personal data under our instructions and protect it.

In the event that we do share personal data with external third parties, we will only share such personal data as is strictly required for specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal data in accordance with those purposes.

As an affiliated club of SS/SASA we are required to ensure that all our members are members of SS/SASA as a condition of our affiliation.

We will share core membership details, competition results, STO activity and qualification and CPD records with SS/SASA who will become a controller of your personal data when they receive it. Scottish Swimming’s privacy notice explains how they use your personal data and can be accessed [here](#).

We publish the results of our competitions and share them with other participating clubs and through social media. This includes competitors’ names, genders, ages and results.

Where we share your personal data in pursuit of our legitimate interests, you have the right to object to us sharing your personal data for such purposes. If you wish to object to such sharing, please contact us at aasc.dataprotection@gmail.com. If we agree and comply with your objection, this may affect our ability to undertake certain tasks for the benefit of you as a member.

How we protect your personal data

Access to personal data is limited to those coaches, workers and volunteers who have a business need to know. They will only process personal data on AASC’s instructions and are subject to a duty of confidentiality. AASC expects those coaches, workers and volunteers to take steps to safeguard personal data in line with AASC’s data policy.

Your personal data is stored on our electronic filing systems and on cloud based servers either based in the EU or operated by subscribers to US Privacy Shield, and is accessed by our coaches and volunteers for the purposes set out above. In certain limited circumstances, paper copies of records may be retained.



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If we are required to transfer your personal data outwith the EU for the purposes of, for example, entering athletes into competitions or booking travel arrangements for training camps we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal data.

How long we keep your personal data for

We will only keep your personal data for as long as necessary. Unless you ask us not to, we will review and possibly delete your personal data where you have not renewed your association with us for one year.

We will keep certain personal data for longer in order to confirm your identity, when you were a member of AASC and for how long. We need to do this to comply with the Companies Act 2006, which requires us to keep a register of members or in the event of a claim against AASC. We will also retain your personal data for longer where we consider you may subsequently request a reference from us.

We have a data register that sets out the periods for retaining and reviewing all data that we hold. This sets out the various retention periods and you can request a copy by contacting us at aasc.dataprotection@gmail.com.

Your rights

You can exercise any of the following rights by writing to us at aasc.dataprotection@gmail.com.

Your rights in relation to your personal data are:

- You have a right to request access to the personal data that we hold about you by making a “**subject access request**”,
- If you believe that any of your personal data are inaccurate or incomplete, you have a right to request that we correct or complete your personal data,
- You have a right to request that we restrict the processing of your personal data for specific purposes,
- You have the right to request the transfer of personal data to another party, and
- If you wish us to delete your personal data, you may request that we do so.

Any requests received by AASC will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner’s Office at www.ico.org.uk.