

# SASA NORTH DISTRICT

## PRIVACY POLICY

### What we need

1. This policy explains when and why we collect personal information about our members and clubs, how we use it, how we keep it secure and your rights in relation to it.
  - 1.1 We may collect, use and store your personal data, as described in this Privacy Policy and as described at data collection point.
  - 1.2 We reserve the right to amend this Privacy Policy as required without prior notice. You are advised to check the SASA North District website or check with the SASA North District Executive for any amendments (amendments will not be made retrospectively).
  - 1.3 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

SASA North District is associated with Scottish Swimming. SASA North District will be a controller of the personal information that you provide to us through the club representatives and Convenors.

### Personal Data

Personal data will be collected by various positions in the North District including North District Executive, North District Convenors and North District Team Managers. The following table outlines the data we will collect:

Data From	Name	Postal Address	Email address	Phone number	D.O.B.	Eligibility Category	Other
Club President	√		√	√			
Club Secretary	√		√	√			
Club Treasurer	√	√	√	√			Club Bank Account and sort code information
Club Delegates	√		√				
Life Members	√		√				
Athletes	√	√	√	√	√	√	Medical information, emergency contact details, competition results
Technical Officials	√	√	√	√	√ (Young Officials only)		Qualification and year of certification
Convenors, Committees, Executive	√		√	√			
Other	√	√	√	√	√	√	Photography request forms, equipment hire forms, incident and accident forms (as appropriate)

## **Why we need your personal information – contractual purposes**

### **Clubs, Life Members, ND Office Bearers' personal data:**

Collection of personal information is required in order to manage your affiliation and communication. We will use your personal information to:

- Provide you with information on District meetings and courses
- For the purposes of our legitimate interests in holding events for the benefit of members of the District
- Setting up and renewing annual affiliation
- General membership services, including NGB communications

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

### **Athletes and Technical Officials' personal data:**

When you register for a competition, event, training course, etc., we need to collect your personal information so that we can honour your booking and to enable you to participate in the course, competition, event, etc.

If you do not provide us with all of the personal information that we need to collect, then this may affect our ability to enter you in a competition, event, or book your place on a training course.

## **Why we need your personal information – legitimate purposes**

### **Members' personal data:**

We also process members' personal information in pursuit of our legitimate interests to:

- Promote and encourage participation in aquatics by sending communications and booking information for upcoming competitions and events. Our competitions and events may be filmed or photographed and your personal information may also be used in images captured from competitions and events, which we use for promotional, education and development purposes
- Provide competition in aquatics by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category
- Monitor and develop participation in aquatics by monitoring members' engagement and participation through FINA rules and inviting our members to participate in surveys for researching and development purposes
- Invite our members as award winners or guests to our events, which may include asking members to nominate individuals for awards and shortlisting such individuals to select the winners, who we will then contact by email
- Develop and maintain our members' qualifications, including sending email communications to members to inform you of upcoming courses, renewal requirements and verify that you have completed any mandatory training
- Respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to aquatics. SASA North District has separate policies governing complaints procedures and we will use your personal information to investigate your complaint, etc.

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us at [sasa-north-secretary@outlook.com](mailto:sasa-north-secretary@outlook.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.

## Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

## Who we share your personal information with

If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with Scottish Swimming and/or GB Aquatics for promotional and/or journalistic purposes.

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure Scotland, and Police Scotland for the purposes of safeguarding children.

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

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

## Athletes' / Participants' personal data

We may publish the results of our competitions on our website and social media. This includes competitors' name, age, eligibility category and result.

## How we protect your personal information

Your personal information is stored on our electronic filing system and is accessed by our volunteers for the purposes set out above.

Some information is stored securely in manual files such as swimming record applications and equipment hire forms.

We are required to transfer your personal information outwith the UK for the purposes of entering athletes into competitions, booking travel arrangements for training camps, etc. Where your personal information is transferred out with the UK, we will provide you with information regarding the safeguards that we have put in place with the recipient country to protect your personal information.

The North District has a secure Dropbox folder which is shared with North District Delegates, Life Members, ND Executive and Convenors. Information shared in this folder includes all files for Delegates meetings, AGM's and EGM's. Personal information is not shared in our North District Drop Box folders other than a single point of contact for each club.

Personal Information from affiliations is stored in a secure OneDrive held by the Secretary and Treasurer.

## How long we keep your personal information

Data	Retention Period
Club Office Bearer's contact information	Until advised of change by Club
Club bank information	Until advised of change by Club
Contact details of Life Members	Until advised no longer requesting contact
Contact details of Club Delegates	Until advised of change by Club
Equipment hire forms	Until equipment hired has been returned
Athlete data in relation to events	Up to 1 year post event
Athlete data in relation to camps	Up to 1 year post event
Athlete disability classification code	Until changed

Data	Retention Period
Athlete record application	Until record is broken
Competition entry and results files	1 year post event
Competition results on website	Indefinitely
Incident forms and associated information	In line with Wellbeing and Protection policies
Technical Official's information	Until advised no longer returning
North District Office Bearer's contact information	Until change of personnel instated
Photography request forms	Until end of meet/event used for

We will only keep your personal information for as long as necessary to provide you with membership services. Information held on Club Executive and Committee personnel will be updated annually in line with SASA North District affiliation.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a member/ affiliate of SASA North District and for how long. We need to do this in the event of a claim against SASA North District.

### Your rights

You can exercise any of the following rights by writing to us at [sasa-north-secretary@outlook.com](mailto:sasa-north-secretary@outlook.com)

Your rights in relation to your personal information are:

- You have a right to request access to the personal information that we hold about you by making a "subject access request"
- If you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information
- You have a right to request that we restrict the processing of your personal information for specific purposes
- If you wish us to delete your personal information, you may request that we do so

Any requests received by SASA North District 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](http://www.ico.org.uk)