

## **WESTERN BATHS WATER POLO CLUB**

### **PRIVACY NOTICE**

Western Baths Water Polo Club takes your privacy seriously and complies with the GDPR (General Data Protection Regulations). We are a 'controller' of the personal information that you provide us. This privacy notices sets out how, why and for how long we will use your personal data, and who we will share it with. This notice explains your legal rights as a data subject and how to exercise these rights.

#### **What we need – Members' and Volunteers Personal Data**

Western Baths Water Polo Club membership requires affiliation to Scottish Swimming. When you register as a member of Western Baths Water Polo Club or renew your membership (Including when you are joining on behalf of a child under the age of 16), we may ask you for the following personal information:

- Contact Details – name, address, email address and phone number
- Date of Birth – to calculate membership category and eligibility for events;
- Payment Details – bank account number, sort code, card details
- Participation Details – other water polo clubs and Scottish Swimming membership
- Equality Information – sex, gender, disability and ethnic groups;
- Safety and emergency details – next of kin, relevant health conditions;
- Coaching Qualifications ( including PVG membership, First Aid and Safeguarding and Protecting Children courses you may have attended); and
- Official qualifications and training attended.

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

Option 1 – Members' personal data:

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

- Provide you with core member services (including insurance, licensing, voting);
- Set up your online membership account with Scottish Swimming.
- Send you membership communications by email in relation to essential membership services (including but not limited to; general meeting notices, membership renewals, membership fees' information, etc.) and

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 membership services and benefits.

Option 2 – Participants' personal data:

When you book a place with us for and attend a coaching course, 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 book your place.

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

Option 1 – Members' personal data:

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

- Promote and encourage participation in water polo by sending members' 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 our competitions and events, which we use for promotional, educational and development purposes.
- Provide competition in water polo 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 water polo by monitoring members' engagement and participation through training and inviting our members to participate in surveys for researching and development purposes.
- 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 and PVG/child protection requirements.
- Respond to and communicate with members regarding your questions, comments and support needs or complaints, concerns or allegations in relation to water polo in line with the club grievance and disciplinary procedures.

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 on [westernbathswaterpolo@gmail.com](mailto:westernbathswaterpolo@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.

Option 2 – Volunteers' personal data:

We will need to collect personal information 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 information will include your PVG certificate number, PVG membership number, date of issue and any relevant information 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 information 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 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 on

[westernbathswaterpolo@gmail.com](mailto:westernbathswaterpolo@gmail.com). If we comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a volunteer.

## **Why we need your personal information – legal obligations**

We are under a legal obligation to process certain personal information relating to our members, volunteers, participants, athletes etc. for the purposes of complying with our obligations under:

- 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

### **Who we share your personal information with**

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

We may be required to share personal information with statutory or regulatory authorities to comply with statutory obligations. Such organisations include Health and Safety Executive, Disclosure Scotland, Police Scotland and UK Anti-Doping for the purpose of eliminating doping in sport and for safeguarding children.

We may also share personal information with professional and legal advisors for the purpose of obtaining advice.

In the event that we do share personal information with external third parties, we will only share such 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.

#### **Option 1 – SGB (Sport Governing Body) members' personal data**

As an affiliated club of Scottish Swimming we are required to ensure that all of our members are members of Scottish Swimming as a condition of our affiliation.

We will share members' personal information with Scottish Swimming who will become a controller of your personal information when they receive it. Scottish Swimming's privacy notice explains how they use your personal information and can be accessed here: <https://www.scottishswimming.com/privacy-policy.aspx>

#### **Option 2 – Athletes' personal data**

We publish the results of our matches/competitions on our social media and website. This may include athletes' name, age and results.

### **How we protect your personal information**

Your personal information is accessed by club committee members only for the purposes set out above. The primary storage of information is on cloud based servers and is stored securely. Where copies are made for the purposes set out above, it is club policy that the copies should be maintained in password protected files, their distribution controlled, and should be securely deleted whenever they are no longer required or the files have been superseded.

### **How long we keep your personal information**

We will only keep your personal information for as long as necessary to provide you with membership services and to comply with legal/insurance purposes. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your membership with us for two years.

### **Your rights**

You can exercise any of the following rights by writing at [westernbathswaterpolo@gmail.com](mailto:westernbathswaterpolo@gmail.com).

Your rights in relation to your personal information are:

- You have the 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 the right to request that we restrict the processing of your personal information for specific purposes; and
- If you wish us to delete your personal information, you may request that we do so.

Any requests received by Western Baths Water Polo Club 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).