



East Lothian Swim Team Privacy Notice

East Lothian Swim Team (ELST) is a composite swim team made up of swimmers from Haddington, Musselburgh and Tranent Swimming Clubs. ELST is a competitive swimming team and as such is affiliated with Scottish Swimming. The Team is supported by our coaching team, swimmers, parents/guardians and volunteers.

To function as an effective swimming team, ELST needs to process personal information about its swimmers, their parents/guardians, our coaches and our volunteers.

This Privacy Notice explains in broad terms the personal information we need to collect, why we need it, what we do with, how we secure it and your rights in relation to this processing.

What we need

ELST will be the data “controller” of the personal information that you provide to us in any format, e.g. the forms we use on our Team App / our website, PVG, emails etc.

When you register as a member of ELST or renew your membership (including if you are registering or renewing on behalf of a child under the age of 18), we will ask you for the following personal information:

- contact details – name, address, email address, date of birth, emergency contact details;
- participation capacity – swimmer, coach, committee member, technical official, etc.;
- relevant medical information – general health information such as any previous medical conditions, allergies etc;
- equality information – gender identity, disability (if any);
- where applicable (for coaches/volunteers), personal information relating to our members for the purposes of complying with our obligations under the Protection of Vulnerable Groups (Scotland) Act 2007 to check that our coaches and volunteers can undertake regulated work with children and vulnerable adults

We also collect contact details (name, email address, phone number) from the public via our website.

Why we need your personal information – contractual purposes

We need to collect the minimum amount of your personal information so that we can manage your membership. We use this information to:

- provide core member services, including, but not limited to, insurance, licensing and PVG checks;
- send membership updates via Team App, email (or other means) in relation to essential membership services, including but not limited to, membership renewals and information on membership benefits.

If you do not provide us with all the personal information that we need to deliver these services, this may affect our ability to offer them.

Why we need your personal information – legitimate purposes

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

- provide our swimmers with competitive swimming by accepting and managing entries for competitions and checking their personal information to ensure they are entered into the correct events.
- develop our swimmers by monitoring their engagement, participation and physical development through attendance registers, competition results, height and weight measurements, etc.;
- raise awareness of the team and its successes via our website and press releases
- develop and maintain our coaches and volunteers qualifications, including sending communications to inform them of upcoming courses, renewal requirements and verify that they have completed any mandatory training and PVG / child protection requirements;
- invite our members to relevant events such as information evenings, meetings and social events;
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to swimming.

The personal information collected via our website is used to respond to general queries about ELST and explore opportunities to further develop the team, e.g. fund raising / sponsorship opportunities.

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 elst.secretary@gmail.com. If we agree to comply with your objection, this may affect our ability to undertake the tasks above.

Why we need your personal information – legal obligations

We are under a legal obligation to process certain personal information relating to our members 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.

Other uses of your personal information

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

Who we share your personal information with

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 obtaining advice.

As a condition of affiliation with Scottish Swimming, we are required to ensure that all of our members are also members of Scottish Swimming. We will share your name and membership category with Scottish Swimming who will become the data 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>.

In the event that we do share personal information with other external third parties (e.g. schools for PACE programme), we will only share such personal information strictly required for the specific purposes and will take reasonable steps to ensure those recipients only process the personal information in accordance with those purposes.

How we protect your personal information

Your personal information is stored on our electronic filing system (ELST owned laptops) as well as Team/Meet Manager, Google Drive and Team App, and is accessed by our coaches and volunteers for the purposes set out above. Please note that data sent via email to specific ELST addresses (e.g. coaching team) may also be processed by other club volunteers if required.

Privacy Notices for Team/Meet Manager, Google and Team App can be viewed here; <https://sportstek.co.uk/terms-conditions>, <https://policies.google.com/privacy?hl=en-GB&gl=uk> and <https://www.teamapp.com/privacy>.

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. We will review the personal information we hold on members at least annually and delete / archive as required.

Your rights

You can exercise any of the following rights by writing to us at elst.secretary@gmail.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 ELST 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.

COVID-19 Addendum (Added August 2020)

As a result of the worldwide Coronavirus pandemic, we may need to record information regarding whether you are displaying any symptoms of COVID-19, have been in recent contact with anyone who has tested positive or is displaying symptoms of COVID-19, have any underlying health conditions or have, or are in close contact with anyone who has, been advised to shield. This information would be required to ensure the safety of ELST members.

Why we need your data

Our lawful basis for processing health information relating to COVID-19 is:

- to protect your vital interests; and/or
- for the legitimate interests of ELST members to ensure individuals' safety and prevent the spread of the virus.

As health information falls within the definition of "special categories of personal data" under applicable data protection legislation, we also need a special condition to process such information. We may need to process this health information:

- to protect your vital interests where you cannot consent;
- for reasons of public interest in the area of public health, including protecting against serious cross-border threats to health where we have a legal duty of confidentiality to you; and/or
- with your explicit consent (if required).

Information we may collect about you

We may collect data from you in relation to COVID-19:

- From a return to water self-declaration and/or a regular health check survey – detailing whether you have symptoms of COVID-19, if you have come into contact with someone with COVID-19, history of having COVID-19, and underlying health conditions.
- Should you report contracting COVID-19 to our COVID Lead Officer, or member of the Management Committee.

Who we share your personal data with

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with public health obligations. In the event that we do share personal information with third parties, we will only share such personal information as is 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.

Where a case of COVID-19 is recorded within ELST, your personal information will not be shared with other members directly, however members will be advised that a case has occurred, whilst keeping personal information anonymous as far as possible.

How long will we store COVID-19 specific data?

We will only keep your personal information for as long as necessary in line with legal obligations – laws or regulation may set a minimum period for which we have to keep your personal information.