



BASC Privacy Statement

What we need

Broxburn & District ASC will be a “controller” of the personal information you provide to the Club.

Members’ personal data:

When you register as a member of Broxburn & District ASC 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, emergency contact telephone number, email address, date of birth;
- Other personal information – medical information;
- Membership criteria / category – athlete, parent, volunteer, Coach or Official
- Equality information – disability (if any) and gender identification.

Volunteers’ personal data:

When you volunteer with Broxburn & District ASC, in addition to the above we will ask you for the following personal information:

- Participation details – coach, teacher, committee; and official
- Other personal information - PVG membership status

Why we need your personal information – contractual purposes

Members’ personal data:

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

- Provide you with core member services, including insurance, licensing and PVG checks;
- Manage your online membership account;
- 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;
- Send you general communications by email in relation to updates on club wide issues including but not limited to, gala notifications, fund raising events, committee meeting minutes.

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

Participants’ personal data:

When you book a place through us to attend a coaching course, competition, training course, we need to collect your personal information so we can honour your booking and to enable you to participate in the course or competition.

If you do not provide us with all of the personal information required, this may affect our ability to book your place.

Why we need your personal information – legitimate purposes

Members' personal data:

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

- promote and encourage participation in swimming 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, education and development purposes (unless you specifically opt out of this);
- provide competition in swimming by accepting and managing entries for our competitions and checking your personal information to ensure you are entered into the correct category;
- 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, PVG and Child Wellbeing & Protection requirements; and
- respond to and communicate with members regarding your questions, comments, support needs or complaints, concerns or allegations in relation to swimming. We will use your personal information to investigate your complaint, to suspend membership, take disciplinary action where appropriate;
- 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 broxburn_asc@hotmail.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.

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 broxburn_asc@hotmail.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 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. 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

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.
- Our professional and legal advisors for the purposes of taking advice.
- Coaches, who provide services to us.

When we share information with these recipients, we take steps to ensure they meet our data security standards for data processors so your personal data remains secure.

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

As an affiliated club of Swim West Lothian we may share your name and membership details with Swim West Lothian who will become a controller of your personal information when they receive it. Swim West Lothian's privacy notice explains how they use your personal information, a copy can be requested by contacting us at broxburn_asc@hotmail.com.

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

How we protect your personal information

Your personal information is stored on our electronic filing system and our servers based in the UK / EU, and is accessed by our volunteers for the purposes set out above.

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. 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 six years.

Your rights

You can exercise any of the following rights by writing to us at broxburn_asc@hotmail.com

Your rights in relation to your personal information are:

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

Any requests received by Broxburn & District ASC 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 Update:

As a result of the worldwide Coronavirus pandemic, we may need to record information regarding whether you are displaying from 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 members attending Broxburn & District ASC.

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 members attending Broxburn & District ASC 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 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.
- If you report contracting COVID-19 through to the COVID Officer or Club Committee Member.

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 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 recipients shall only process the disclosed personal information in accordance with those purposes.

Where a case of COVID-19 is recorded within the club, your personal information will not be shared with other members directly, however members will be advised 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.