



General Data Protection Regulation (GDPR) Policy Privacy Policy

Marlborough Penguins Amateur Swimming Club (the Club) is committed to protecting and respecting your privacy. For any personal data you provide for the purposes of your membership, the Club is the Data Controller and is responsible for storing and otherwise processing that data in a fair, lawful, secure and transparent way.

What personal data we hold on you

You provide us with your and/or your children's personal data when you join the Club by completing our membership forms, when you enter a competition, or by corresponding with us verbally, by phone, e-mail or otherwise. Whilst you or your children are members, you may also from time to time provide us with other personal data about you or your children (e.g. Health issues such as injuries) and personal data may also be generated (e.g. Personal Best Swim times).

The data you give us may include your name, date of birth, address, e-mail address, phone numbers, gender, ethnicity, medical conditions and medication.

Why we need your personal data

The reason we need your personal data is to be able to administer your membership, and provide the membership services you are signing up to when you join the Club. Our lawful basis for processing your personal data is that we have a contractual obligation to you as a member to provide the services you are registering for.

Reasons we need to process your data include:

For training and competition entry

- sharing personal data with club teachers, coaches or officials to administer training sessions;
- sharing personal data with club team managers to enter events;
- sharing personal data with facility providers to manage access to the pool and other training facilities (e.g. Gym)
- sharing personal data with Wiltshire County Amateur Swimming Association, Swim England South West, Swim England and the ASA (Amateur Swimming Association) and other competition providers (eg other swimming clubs) for entry into swimming events.

For membership and club management

- processing of membership forms and payments;
- sharing data with committee members and club officials to provide information about club activities, membership renewals or invitation to social events;
- club newsletter promoting club activity; and
- publishing of race and competition results

For communications

- keeping you informed of Club matters such as changes to swim sessions, swimming competitions and social events
- keeping you informed of changes to Club Policies such as Child Safeguarding and Protection
- sending an annual club survey to improve your experience as a club member
- sending information about selling club kit and merchandise

Any health data we hold on you or your children is only processed for the purpose(s) of ensuring fitness to swim and/or passing health data to teachers/coaches to allow the safe running of training sessions. We process this data on the lawful basis of consent and your consent to process this data is given by you when you sign our membership forms.

On occasion we may collect personal data from non-members e.g. to manage our waiting list to join the Club. This information will be stored until you become a member or you tell us you no longer wish to join, when it is then destroyed securely. Our lawful basis for processing data is consent. Therefore, we will also need explicit consent from non-members to process this data, which we will ask for at the point of collecting it.

The club has a Twitter social media page that all members are able to join. If you join, please note that the provider of the social media platform has their own privacy policies and that the Club do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on the club social media pages.

Who we share your personal data with

When you become a member of the Club, you will also automatically be registered as a member of the Amateur Swimming Association (ASA) and Swim England who are the governing body for Swimming. We will provide them with your and/or your children's personal data that they will use to register and administer your membership including for insurance purposes.

The Club does not supply any personal data it holds for this purpose to any other third party. The Club does not store or transfer your personal data outside of the UK.

How long we hold your personal data

We will hold your personal data on file for as long as you are a member with us. We ask you to update your and/or your children's personal data every year on annual membership forms. Any personal data we hold on you will be securely destroyed after 3 months of leaving our Club. Your personal data is not processed for any further purposes other than those detailed in this policy.

Your rights regarding your personal data

As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data; to restrict or object to certain kinds of processing of your personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.

As a data subject you are not obliged to share your personal data with the Club. If you choose not to share your personal data with us we may not be able to register or administer your membership.

