DATA PRIVACY POLICY

About this Policy

1. This policy explains:
   - When and why we collect personal information about our members, their parents / guardians, our coaches and volunteers,
   - How we use it and how we keep it secure; and
   - Your rights in relation to it.
2. We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect it from you.
3. We reserve the right to amend this Data Processing Policy from time to time without prior notice. You are advised to check our website www.nadaswimclub.org.uk
4. Please be reassured that amendments will not be made retrospectively.

About GDPR

1. GDPR, refers to the new General Data Protection Regulation that come into force in the UK on 25 May 2018.
2. 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).
3. The language of GDPR can be a little confusing so when you read it:
   - We, the club, are the "Data Controller" of all personal data we hold about you; and
   - You, the member, the coaches or the volunteers are the "Data Subjects".

About Us

1. GDPR replaces what you may have known as the Data Protection Act 1989.
2. It applies to processing of personal data "in the context of the activities of an establishment" (Article 3(1)) of any organization and this includes swimming clubs.
3. Our context is one of an "unincorporated association". The implication of this is that:
   - All members are personally, jointly and severally liable for the liabilities and claims caused by another;
   - Our activities are predominantly carried out by volunteers;
   - We comply with the law, but in doing so we seek to do the minimum necessary to do so to keep your costs low and to preserve our volunteer structure;

- We therefore do not operate complex data processing systems or system of internal control that we expect of a larger corporations and their associated cost structures; and

- We agree to hold each other harmless for any errors or omissions by our coaches and our volunteers in respect of data processing save to the extent that their actions are contrary to our agreed policies and procedures, reckless or malicious.

Who is responsible for GDPR in our club?

1. We are Newport & District Amateur Swimming Club.
2. Compliance with GDPR is the responsibility of the Club Chairperson – Megan Frost.
3. We are based at Newport Swimming Pool, Victoria Park, Newport, Shropshire, TF10 7LH.
4. You can contact us by:
   - Writing to the Club Chairperson at the above address; and
   - Emailing the Club at nadaswimclub.chair@gmail.com

What information do we collect and why do we collect it?

1. We collect a range of information relating to:
   - Correspondence and communication details;
   - Swimmer's gender, age, performance, health and physiology;
   - Coach and volunteer qualifications and training;
   - Photographs and videos;
2. We need this information to:
   - Manage club membership, membership of Swim England and deliver SwimAffiliation;
   - Payment, collection and reimbursement of dues and fees;
   - Carry out swimming training and participating in domestic competitions;
   - Share race results within the swimming community, local and national media;
   - Have qualified and accredited coaches and volunteers within the club;
   - Operate a club, e.g. governance, welfare, training, travel, competition, press, reporting, education etc;
   - Participate in the sport of swimming as regulated by the Swim England and
   - Comply with health and safety, manage our risks and manage incidents.
3. In providing certain data to the club, you agree to grant the club irrevocable rights to use that information for the purposes of its records, marketing and digital presence.
   This information specifically includes:
   - Photographs and videos;
   - Training data and
   - Records and associated names and dates.

How we protect your personal data

1. We will not transfer your personal data outside the EEA without your consent.
2. We have implemented generally accepted standards of technology and operational security for our context in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

What we will do in the event of an incident involving data

1. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

that is personal to you

2. We define serious risk as:
   - Data relating to our assessment of your performance;
   - Data relating to welfare issues involving you;
   - Data relating to health or medical issues involving you; and
   - Data that we classify as High Risk in our Data Risk Analysis.
3. We do not define serious risk as:
   - Your name and address – generally known;
   - Your date of birth – widely available within swimming;
   - Your bank account details and
   - Data that we classify as Medium or Low Risk in our Data Risk Analysis.
4. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
5. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

Who else has access to the information you provide us?

1. We will never sell your personal data.
2. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except as described in this policy.
3. In the event that you choose to restrict how we use your data to such an extent that we cannot efficiently operate the club or a swimmer's participation in it, we reserve the right to terminate your membership. We shall not do this without discussing the implications of complying with your instructions with you first.
4. We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). However, we disclose only the personal data that is necessary for the third party to deliver the service and we shall have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

How long do we keep your information?

1. We will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as is necessary to comply with our legal obligations.
2. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with welfare obligations, membership of Swim England, tax requirements and exemptions, and the establishment exercise or defense of legal claims.
3. We securely destroy all financial information once we have used it and no longer need it.

Your rights

1. You have the following rights under the GDPR:
   - to access your personal data;
   - to be provided with information about how your personal data is processed;
   - to have your personal data corrected;
   - to have your personal data erased in certain circumstances;
   - to object to or restrict how your personal data is processed; and
   - to have your personal data transferred to yourself or to another business in certain circumstances.

2. You have the right to take any complaints about how we process your personal data to the Information Commissioner:
    - Their website is, https://ico.org.uk/concerns/ ;
    - Their telephone number is, 0303 123 1113; and
    - Their address is, Information Commissioner's Office Wycliffe HouseWater Lane Wilmslow, Cheshire SK9 5AF.

Any questions

For more details, please address any questions, comments and requests regarding our data processing practices to our Chairman or by writing to the Club.

Approved on 1st November 2026