
WOKING SWIMMING CLUB



Affiliated to: Swim England, Swim England South East Region & Surrey County ASA www.wokingsc.co.uk

Data Protection and Communication Policy

Membership Data Collection - Consent

The Data Protection Act 1998 ("the Act") and the EU General Data Protection Regulations (GDPR) sets out certain requirements for the protection of your personal information (i.e. information about you) against unauthorised use or disclosure. The Act also gives you certain rights.

References below to the Amateur Swimming Federation of Great Britain Ltd (ASFGB Ltd) include a reference to the three members of ASFGB Ltd, the Amateur Swimming Association (ASA), Scottish Swimming Association (SASA) and Welsh Swimming Association (WASA). By virtue of your membership direct or indirect of ASA, SASA and WASA you agree to your personal data being made available to ASFGB Ltd and its members, subject always to compliance with the Data Protection legislation. This does not include sensitive personal data such as health or medical conditions, which require the explicit consent of the data subject i.e. a signature for this specific purpose.

Except to the extent that Woking Swimming Club (WSC) or ASFGB Ltd is required or permitted by law, the information which you provide to the club on your membership form, and any other information obtained or provided during the course of your membership ("the Information"), will be used solely for the purposes of processing your application and dealing with you as a member of a swimming club.

Such information may include parent and swimmer's names, addresses, telephone numbers, email addresses, records of payments and fees, dates of birth, digital / video images, swimming times, swimmer's school and also details of swimmers' relevant medical conditions of which the club should be aware in connection with your health and safety while participating in club activities.

During the COVID-19 pandemic swimmers/parents of swimmers will be required to fill in a health questionnaire before they return to the pool, either as part of the general return of the club to training, or because a swimmer has contracted COVID-19, has recovered and wishes to return to regular training.

The club undertakes to take reasonable care of the Information and to adhere to the 8 guiding principles of the Act as set out below:

Personal data will be:

1. Processed fairly and lawfully.
2. Processed for specified, lawful and compatible purposes.
3. Adequate, relevant and not excessive.
4. Accurate and up to date.
5. Not kept for longer than necessary.
6. Processed in accordance with the rights of the individual.
7. Processed with appropriate security.
8. Not transferred to countries outside the European Economic Area without adequate protection.

The club makes use of four commercial products for the storage of personal data: Google Drive, Hytek, Clarion and Team Unify. Google Drive and Hytek host our data outside of the EU and the club considers that these organisations have adequate protection to the best of our knowledge.

With the implementation of Team Unify most of our membership data is held in the Team Unify database. In GDPR terms WSC performs the role of Data Controller and Team Unify is the Data Processor storing and processing data on our behalf as directed by us. Use and sharing of data shall only be done in line with this data protection policy.

For a complete list of the data stored in TeamUnify and the locations of this data please see Appendix A.

Access to personal data held in these systems is restricted to a small number of individuals (Data Processors) in the club and only where it is relevant to their role. A data privacy module is implemented in Team Unify which restricts the amount of data that can be seen to what is relevant for a given role. Any queries regarding data protection should be addressed to the club Data Protection lead by email.

The club as the Data Controller will make every effort to comply with these principles and keep records of their state of compliance.

To comply with government regulations regarding COVID 19 contact tracing WSC may be required to provide contact details of swimmers who attended a given session. This will be done with a guiding note to explain which swimmers or others may have been in close contact. By accepting this policy you as a parent are accepting this use of data.

If you cease to be a member of WSC, the Information will not be held for longer than is necessary, after which time it will be destroyed. Currently the club allows a cooling off period of 30 days before removing data; after this time we will remove the data.

There is an exception to this in terms of club records. If your swimmer holds a current club record then the club will retain Swimmer name, ASA number and date of birth. This is to enable us to be able to publish current club records and this information will also be retained by the ASA and various ranking websites. If you wish for this data to be removed permanently also then you must notify the club secretary and optionally the individual ranking organisations.

You agree to use all reasonable endeavours to keep your club and ASFGB Ltd informed of any changes to your personal data to ensure accuracy. The club's preferred method of communication to its members shall be by email or Clarion communication.

So that we may use the Information for the above purposes and on the above terms, we are required under the Act to obtain your consent. Up to the 25th May 2018 this may be implied consent. We therefore take your reading of this notice on either through this communication or the club's website as implicit consent to use information on the above terms and to communicate with you by email or Clarion communication. If you do not consent, then you are asked to advise the club's secretary in writing within 21 days of receipt of this communication.

Club Secretary June 2020

Appendix A

What personal information does WSC collect about you?

WSC collects and/or processes - through the TeamUnify platform - the following personal information about swimmers and their parents / guardians:

- Athlete / swimmer name, date of birth, gender, (optionally sportswear size and other measurements), physician name and contact details, medical information (if relevant and with parental consent), information about club membership and membership in sports bodies and associations, ability group, attendance history, competition results, medical insurance information, emergency contact, videos, photos, any additional comments, notes or information about an Athlete submitted by any End User.
- Parent / legal guardian name, date of birth, and contact details, such as address, email and phone number.
- Billing information and payment details, such as credit card and purchase history
- Videos and photos
- Athlete / swimmer meet results.
- Swim England registration data for athletes / swimmers and the club workforce.
- Background and criminal record checks results for club workforce, with consent.

How does WSC use swimmer and parent/legal guardian personal information?

WSC uses this information for the following purposes:

- To operate the club and allow swimmers and their parents / guardians to easily register for and attend swim meets, sign up for jobs, access swim time histories and swimming practice photos and videos, practice management, for event management, communication, billing and collection of fees, and other services they request.
- For internal club record keeping.
- To comply with national and regional sports bodies' (e.g., Swim England) registration and membership requirements.

Does WSC share your personal information with third parties?

WSC will not share personal information without consent, except:

- Where it is necessary to share with a service provider, such as TeamUnify or SportsEngine (TeamUnify's parent company), in order to provide members, their parents, and coaches with services they have requested (e.g., to easily register for and attend swim meets, sign up for jobs, access swim time histories and swimming practice photos and videos); for practice management; event management; communication; billing and collection of fees; and other services they request.

Why does our website refer to NBCUniversal's privacy policy?

NBCUniversal's privacy policy, does not apply to WSC's Swimmer data uploaded onto the TeamUnify platform. The reason why TeamUnify link to the NBCUniversal privacy and cookie policies on our platform is to detail some minimal cookie uses on the TeamUnify pages (e.g., that allow them to understand how the sites are used in order to improve the services). A logged in user can opt out of this monitoring.

For GDPR purposes, WSC is the "data controller" and TeamUnify is the "data processor". Therefore, it is WSC's data protection and privacy policy that applies to WSC swimmer data. In the context of our relationship, TeamUnify merely acts on WSC instructions as described in the TeamUnify Subscription Agreement.

Where is our club's data in TeamUnify geographically and physically stored?

TeamUnify's UK office is based in Belfast, Northern Ireland, and they use Amazon's Amazon Web Services (AWS) data centre in Ireland as our data hosting facility. To assist TeamUnify in the delivery of the Software and Services they use third party vendors. As such, these vendors may store and process personal data about

WSC and its members.

Team Unify's Vendors include:

Vendor	Location	Vendor Role / Description	Website
Amazon (AWS)	Ireland	Data Centre Hosting Facility	https://aws.amazon.com/
Salesforce	United States	Cloud-based customer service management and communications service where administrator's contact information is held for our staff to provide appropriate support to our customers.	https://www.salesforce.com/
Hubspot	United States	Marketing CMS tool that is used to provide informational emails and communication about our service to administrators of clubs.	https://www.hubspot.com/
UserVoice	United States	Support ticketing tool that is leveraged by the support team to answer questions that are asked by users.	https://www.uservoice.com/
MailGun	United States	Email relay tool that allows clubs to communicate with their membership	https://www.mailgun.com/
Wistia	United States	Video Hosting to allow administrators of the SwimOffice Pro software to take and share video with members privately or publicly.	https://wistia.com/

Where is it data backed up/transferred to?

As noted above, Team Unify stores WSC data at our data storage facility Amazon's Amazon Web Services (AWS) data centre in Ireland.

Depending on the services we use, Team Unify may also engage one or more of the vendors listed in the table above to help them deliver the services we have requested (e.g., to relay emails). Where they need to transfer our data to a vendor based outside of Europe, they will adopt an appropriate data transfer mechanism to ensure that the personal data with which we entrust them remains protected irrespective of location.