



Data Protection Policy

Bangor Swimming Club ("We") are committed to protecting and respecting your privacy. This policy (together with our constitution, and terms and conditions) sets out the basis on which any personal data we collect from you or that you provide to us through our website, forms or otherwise will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Acts 1988 and 2003 (the Acts), the data controller is Bangor Swimming Club, a community amateur sports club (CASC), with an address of 3 Valentine Rd, Bangor BT20 4TH.

What personal information we hold?

We may collect, retain and process the following data:

- Information that is provided by any person filling in forms on our website www.bangorsc.co.uk (our website) or otherwise including (but not limited to) membership forms, medical forms, assessment forms, e-vetting competition or event entrance forms or education enrolment forms.
- If any person contacts us via phone, email, post or otherwise, we may keep a record of that correspondence.
- Where you are a member of Bangor Swimming Club, we may keep a file on you as a member and also relevant details of your parent/guardian (where applicable). We may also collect information, assessments, images or videos from any competitions, events or training sessions run by Bangor Swimming Club and other swimming organisations and entities in which you participate.
- Where you are a contractor, employee, volunteer or supplier, we will keep a file of our interactions with you and any contracts or agreements we have made.
- Details of visits to our website including, but not limited to, IP addresses, traffic data, location data, weblogs and other communication data. This is anonymous statistical data about our users' browsing actions and patterns, and therefore does not identify any individual.

Sensitive Personal Data

Please note that where you give us any sensitive personal data, including but not limited to medical data, we treat this with the utmost confidentiality. We will only disclose this information to members of Bangor Swimming Club who need to know it in order to protect your health and welfare. We may also disclose it where we have a legal obligation to do so.

If you are travelling to a competition or event and we need to share your sensitive personal data with any third party in connection with this, to the extent this party is not listed in our medical consent form that you have already signed and agreed to, we will let you know in advance and ensure that you are happy with us disclosing this information about you.

What does Bangor Swimming Club do with this information?

We use information held about you in the following ways:

- To maintain a record of your relationship with Bangor Swimming Club and your participation in any event, competition, training, course or otherwise with or on behalf of Bangor Swimming Club.
- For inclusion in international and/or national ranking lists (as required).
- To carry out our obligations arising from any contracts or agreements entered into between you and us.
- Images or video taken at events, competitions or training may be used for Bangor Swimming Club training or marketing purposes, including social media posts.
- To provide you with information or services that you request from us or to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about.
- To notify you about changes to our services.
- To ensure that content from our website is presented in the most effective manner for you and for your computer.
- We may also provide third parties with aggregate information about our users that does not identify them.

What information does Bangor Swimming Club need?

We need to hold personal information on our members for the following reasons:-

- Identity and membership within the club. We need to hold your name, Swim Ireland member number, address, age, sex.
- Correspondence information to contact the swimmer or parent/guardian.
- For progress tracking and entry to appropriate events we have to hold performance statistics.
- Any health consideration or disability noted by members to the club will be stored, and shared with Club Coaches and volunteers strictly on a need to know basis (See section on Sensitive Personal Data).
- Fees and payments must be held for business purposes. Note any credit card information is held within a secure platform which complies with PCI-DSS, provided by Active Networks.

Note that Bangor Swimming Club's primary purpose for holding member data is for the purposes of affiliation and participation in events. Also, we only share information with our governing bodies for the purposes of affiliation and participation in events. Member data is not shared by Bangor Swimming Club with any body outside of Bangor Swimming Club for other purposes, such as marketing etc.

Are we creating new personal information?

The personal data Bangor Swimming Club hold is provided by our members in general. Bangor Swimming Club may create new personal information through photographs and event publications,

such as individuals achievements being documented. We also collect information on events focusing on the progress of our swimmers.

Are there multiple data controllers?

Note:- The Data Controller is a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

Yes – Your data is used by Bangor Swimming Club to allow the club to operate, and also for Bangor Swimming Club to contact you with both information pertinent to your membership, and to promote club events, such as galas and social events.

Further to this, the specific data required for swimmers' affiliation and involvement in events is shared with our regional and national governing bodies, Swim Ulster, and Swim Ireland.

Where do we store your data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. However, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Are there multiple data Processors?

Yes – Your data is managed by Bangor Swimming Club, and we utilise the following systems which have the listed associated controllers.

Data Held	Processor Name	Location
Email Correspondence with club members	Paragon Internet Group	UK
Web hosting Promotions and information on squads & galas	Paragon Internet Group	UK
Registration, billing, gala events, personal	Active Network LLC	USA (PCI-DSS Compliant)
Email distribution, for information and promotion (new for 2018)	Mailchimp	USA (DPA signed)

Note – the security standards for Active Networks Swim Manager:-

http://www.activenetwork.com/assets/active+network/553_13_corp_security_doc_for_an.com.pdf

Disclosure of your information

We may disclose your personal information to:

- Swim Ireland, other Swim Ireland clubs or regions;
- the Irish Sports Council / Northern Ireland Sports Council; or
- the Institute of Sport / Sports Institute of Northern Ireland.

We may disclose your personal information to third parties:

- Where you give us permission to do so.
- Where you participate in an event or competition that is run by a third party, we may transfer limited personal data about you to facilitate your entry and participation in that event or competition.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply Swim Ireland's Terms and Conditions of Use and other agreements; or to protect the rights, property, or safety of Bangor Swimming Club, our members, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Your rights

You have the right to ask us not to process personal data for Bangor Swimming Club marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect user data. You can also exercise the right at any time by opting-out at the end of any marketing communication we send you.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Access to Information

GDPR gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act, free of charge.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to contactus@bangorsc.co.uk