



Southbourne Surf Life Saving Club

DATA PROTECTION – PRIVACY NOTICE

The Club is committed to respecting the privacy of all our members. This notice explains:

- How we comply with the law on data protection
- What your rights are
- How we may use personal information we collect before, during and after your membership.

The Club has not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Club Secretary has overall responsibility for data protection compliance in our organisation.

Contact details are set out in the "Contacting us" section at the end of this privacy notice.

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1. About this Policy

1.1 We may collect, use and store your personal data, as described in this Privacy & Data Protection Policy and as described when we collect data from you.

1.2 We reserve the right to amend this Privacy & Data Protection Policy from time to time without prior notice.

When we change this notice in a material way, we will update the document version control.

The amendment will take effect once the revised Privacy & Data Protection Policy is available via a link on our website <https://southbourne.org.uk/>. Please refer to this Privacy & Data Protection Policy each time you submit your personal information. You are advised to check our website regularly for any amendments (but amendments will not be made retrospectively). For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

1.3 We will always comply with the General Data Protection Regulation (GDPR) and Data Protection Act 2018 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). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

2. Who are we?

2.1 We are Southbourne Surf Life Saving Club. Our clubhouse is located at Solent Promenade Southbourne Coast Road, Bournemouth, BH6 4BE.

3. Personal Information we may collect, process and retain

3.1 We will collect the personal information from everyone who takes out membership with the Club, from the parents and carers of our under 18 members and from anyone who volunteers for us.

3.2 Generally, this will be:

- personal contact details – name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- records of your attendance at any events hosted by us;
- images in video and/or photographic form and voice recordings;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any player rankings, grading or ratings, competition results, details regarding events/matches/games attended and performance (including that generated through training / pathway programmes);
- any disciplinary and grievance information.

4. Special Categories of Personal Information

4.1 We may also collect and process the following “special categories” of more sensitive personal information:

- information about your health, including any medical condition, health and sickness records, medical records and health professional information.

4.2 In relation to the special category personal data that we collect and process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

4.3 We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

5. Reasons and lawful bases for collecting and processing information

5.1 The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Type of information	Purpose	Legal basis of processing
All membership information gathered on the membership application form.	Passing to SLSGB to administer membership of SLSGB. See paragraph 6.3 below.	Legitimate Interest
The Club has access to all membership information provided to SLSGB via the SLSGB membership database – their Privacy Notices can be found on their website . Information obtained from the SLSGB membership database is used by the Club in the following ways:		
Contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	To administer and manage membership and our relationship with you including dealing with payments, providing support, answering your queries, dealing with complaints.	Contract Legitimate Interest
Emergency contact details.	Contacting next of kin in the event of emergency	Vital Interests
Contact and membership details.	To send you information related to your membership, including details about competitions and events (both club and other partner organisations) and general club updates.	Legitimate Interest
All contact and membership details, transaction and payment data.	To administer your attendance at any courses, programmes or events you sign up to.	Legitimate Interest
Health and medical information	To use information about your physical or mental health	Legitimate Interest Legal Obligation

Type of information	Purpose	Legal basis of processing
	(including any injuries) or disability status, to ensure your health and safety & the safety of others and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities and to tailor teaching and communication techniques to your needs.	Vital Interests
Personal and potentially sensitive information.	To gather evidence for possible grievance or disciplinary hearings to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.	Legitimate Interest Legal Obligations
Name, title, date of birth gender, information about your race or ethnicity and health and medical information	For the purposes of equal opportunities monitoring to promote a sports environment that is inclusive, fair and accessible.	Legitimate Interest
Name, title, date of birth / age related information, gender	Managing membership categories and fixtures / race entries which are age / gender specific.	Legitimate Interest
Gender	Provision of adequate facilities for members.	Legal Obligation Legitimate Interest
The Member's name, SLSGB membership number and age-related information.	Managing / facilitating entry to fixtures/ race entries and race results. Sharing race results with other clubs and governing bodies. Publishing race programmes.	Legitimate Interest
Images in video and/or photographic form.	For the purposes of promoting the club, our events and membership packages on our Club website and social media.	Consent
The following information is collected and used by the Club in the following ways; it is not shared with any SLSGB or any other organisation unless explicitly mentioned below:		
Information provided to us by those purchasing goods/tickets or services from us, including for awards.	To administer your purchase or attendance at courses, programmes or events.	Legitimate Interest

Type of information	Purpose	Legal basis of processing
Records of attendance Performance data / results	To organise training and for award evidence. Some performance data such as timed swims may be shared with SLSGB.	Legitimate Interest
Information about your criminal convictions and offences.	To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements. To gather evidence for possible grievance or disciplinary hearings to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications – this data may be shared with SLSGB or other agencies.	Legal Obligation
CCTV Image	As outlined in our CCTV Policy: For the prevention and detection of crime. To provide evidence and assist in the detection of crime. For safety and security of club members and the clubhouse. This data may be shared with the police on request in connection with investigation or prosecution of a crime.	Legitimate Interest Legal Obligation

5.2 If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in section “Your rights in relation to personal information” section below.

6. Disclosure of Your Personal Information

6.1 We share personal information with the following parties:

- Any party approved by you.
- To any governing bodies or regional bodies for the awards/sports/activities covered by our club: to allow them to properly administer the sports on a local, regional and national level.
- Other sports clubs hosting events: to allow them to properly administer the sports on a local, regional and national level.

- The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives.
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

6.2 We do this for the purpose of our legitimate interests in operating the Club, for performing the Club's Object as per the Club Constitution, or when required by law, government or our regulators. We disclose only the personal data that is necessary for the third party to deliver the service or requirement.

6.3 **SLSGB membership.** Once an application form and the relevant membership is received by the Club, information gathered on the form will be shared with SLSGB in order to process membership of the government body: a requirement of club membership. Any personal data submitted to SLSGB will be governed by the SLSGB privacy policy as available on their [website](#) at the time of form completion and subsequent notified revisions.

7. Retention of Personal Information

7.1 The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements.

7.2 Generally, where there is no legal requirement, we retain all physical and electronic records for a period of 6 years after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 24 months.
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

7.3 It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you by contacting the Membership Secretary by using the "contact us" from on the club website.

7.4 Retention of records; we provide cloud storage to enable our committee and trainers to securely store personal information away from their personal computer.

8. Your right to access information

8.1 You have the right to access the information that Southbourne Surf Life Saving Club holds about you.

8.2 In order to do this, please make a written application to the Club Secretary, using the email address provided on our website. The Club may require you to provide verification of your identity to provide a copy of the information that it holds.

8.3 Children have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased. We encourage

the holders of parental responsibility for children to share this policy with your children if you feel they are old enough to understand it.

9. Club website

9.1 Cookies are pieces of information that a website transfers to your computer's hard disc for record keeping purposes. Cookies can make the web more useful by storing information about your preferences on particular sites, thus enabling website owners to provide more useful features for their users. They contain no name or address information or any information that will enable anyone to contact you via telephone, email or any other means. Most browsers are initially set to accept cookies. If you would prefer, you can set your browser to disable cookies or inform you when they are set. Information on how to disable cookies can be obtained by referring to either your Operating Systems Manual or your Browser Guide, or by contacting your Internet Service Provider.

9.2 Our web pages may contain electronic images, known as web beacons or spotlight tags. These enable Southbourne Surf Life Saving Club to count users who have visited certain pages on our website. Web beacons and spotlight tags are not used by us to access your personal information, they are simply a tool we use to analyse which web pages customers view, in an aggregated manner.

9.3 Our website may contain links to other sites. Please be aware that we are not responsible for the privacy practises of these sites. We encourage our users to be aware when they leave our site and to read the privacy statement on those sites. This Privacy & Data Protection Policy does not apply to information collected on third party sites.

11. How we protect your personal data

11.1 Your personal information will be held in EEA countries or in countries where the European Commission has decided that the country ensures an adequate level of protection, for example where a service provider has self-certified to the standards set out in the EU-U.S. Privacy Shield.

11.2 We have implemented generally accepted standards of technology and operational security to protect personal data from loss, misuse, or unauthorised alteration or destruction.

11.3 We always transfer data over TLS/SSL secure connection. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

11.4 We provide cloud storage to enable our committee and trainers to securely store personal information away from their personal computer and we only use club email to send and receive personal information.

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

11.6 We securely destroy all financial information once we have used it and no longer need it.

12. Your rights in relation to personal information

12.1 You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;

- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

12.2 You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data.

12.3 However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

12.4 Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

12.5 If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office. We are here to help and encourage you to contact us to resolve your complaint first.

13. Contacting Us:

For general queries about this notice, to exercise any of the above rights, or if you have any questions relating to your rights, please contact our Club Secretary via the email provided on our Club [website](#).