

# SENW Ltd Policy

## Privacy Policy

SENW Ltd respect your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data, both submitted for an event or required purpose and through our Regional website (regardless of where you visit from) and tell you about your privacy rights and how the law protects you.

In this privacy policy we explain how we collect your personal information. 'We' at SENW Ltd (are affiliated to The Amateur Swimming Association (Swim England) Limited) and we are the data controller for the purposes of the Data Protection Act 2018 which implements the EU General Data Protection Regulation requirements. We are not required to appoint a Data Protection Officer.

Details of how to contact us if you have any questions about privacy or data protection can be found below in the Contact Details section.

We must have a lawful basis to process your personal data, and this policy explains what our lawful basis is in respect of each purpose for which we keep and use information about you. Generally, we are allowed to process your personal data where it is necessary in connection with a contract between us (such as a contract to supply our products or services), where it is necessary in order for us to comply with our legal obligations, or where we have a legitimate interest to do so (but we will always consider whether your right to privacy overrides our interest).

Please note that links from our website may take you to external websites which are not covered by this policy. We recommend you check their privacy policies before submitting any personal information to such sites. We will not be responsible for the content, function or information collection policies of these external websites.

The Swim England website was created and continues to be managed by HelloWeb, and as such they will process your data on our behalf when you visit our website. They will only use your data for the purposes outlined. Our regional website content will guide you to the use of the Swim England website and Institute of Swimming section which is run by SKYLAB and the swimmingresults.org website which is managed by SPORTSYS LLP (trading as Sportsystems), and they will process data for the purposes set out below.

### What information do we collect about you and how do we collect it?

You are not required (by law or by any contract with us) to provide personal information to use via the website or any other data collection method. We will only require you to provide personal information to us where it is necessary of us to provide you with a service at your request.

#### Information you provide to us

We collect personal information about our Swim England members by the following:

- Enquiring about our products, service, competitions/events/courses
- Entering our events, competitions or courses through our regional website or online entries
- Signing up to our newsletter and further information

- Using and browsing our website
- Telephoning, texting, writing by post or emailing us
- Enquiring about volunteering opportunities
- Officials Finder
- Completion of Club Investment Fund Bursary applications

This information may include the following:

- Normal Identification Information, such as your full name, date of birth, age, gender
- Contact Information, such as your postal address, email address and telephone number.
- Additional information relevant to the service requested (e.g. competition, event or courses) including ASA (Swim England) number, specific entry requirement (including qualification times), or attendance records of a specific course.
- Records of interaction with us such as telephone conversations, emails and other correspondence and your instructions to us.
- Records of your attendance at any events, competitions or courses hosted by us.
- Results from competition may also be documented and promoted on the SENW Ltd Regional website and SENW Ltd Social media accounts (Facebook and Twitter).
- Images in video and/or photographic form and voice recordings. Our competitions and events may be filmed for live streaming purposes. During our competitions occasional photographs may be taken at the event. During specific events, group or individual photos of affiliated members may be taken and placed on the Regional Website. In all cases permission and consent will be sought from parents and guardians. At any time, permission can be revoked and individuals have the right for any photographic record to be removed/deleted. For the Regional Pathway Programme, video may be used as a coaching tool by the programme team.
- Payment information (this is securely collected and processed by our payment provider; for example sage pay and via BACS transfer).
- Sensitive information (such as medical details) which will ensure safety and wellbeing of each individual at events, competitions or courses hosted by us.
- In respect of paid work completed on behalf of the Region, personal details for the purpose of casual worker forms or contract of services.
- Regional Pathway Programme – blood samples which will be used to facilitate blood lactate monitoring within training and competition environment.

Please note that this is not an exhaustive list and will be updated and amended as required.

### **Information we collect about you on our website**

We may collect the following information about you from our website when you are booking onto an event which is being ran or hosted by the region:

- Any information collected as part of the order process
- Any information collected on the contact form
- Any information collected on the Become a Volunteer Form.

WPEngine is used to provide the WordPress Hosting which is used to generate the SENW Ltd Regional website. This format is the most secure solution for WordPress sites and is where our website is hosted and information is stored. Order information is emailed to the designated regional office staff in order for processing.

For WPEngine' general data protection compliance and other information please see: <https://wpengine.com/support/gdpr-compliance/>

## **Information we collect about you from other sources**

We may collect information about you from other sources. This may include the following:

- Publicly available information, from sources such as Companies House
- Information you have shared publically, including on social media
- Information from third party databases or data suppliers, such as Swim England Membership, Swimming Rankings and Institute of Swimming.

This list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this policy.

## **Information we received about you from other sources**

Sometimes you will have given your consent for other websites, services or third parties to provide information to us.

This could include information we receive about you if you use any of the other websites that we operate or the other services that we provide, in which case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected. We will have also told you for what purpose we will share and combine your data.

It could also include information from third parties that we work with to provide our products and services, such as payment processors, delivery companies, technical support companies and advertising companies. Whenever we receive information about you from these third parties, we will let you know what information we have received and how and why we intend to use it.

## **How do we use your personal information?**

We take data protection law seriously, so below we have set out exactly how and why we use your information, and what our legal basis is to be able to use your information in each way.

## **Supplying our products and providing our services**

It is necessary for us to use your personal information to enter into and perform the contracts that we make with you, such as when you become a member. Using your information in this context is necessary so that we can:

- Provide you with information about products or services which we feel may interest you, where you have consented to be contacted for such purposes.
- Provide members with information which is included within your membership benefits package, including any courses, events or updates.
- To carry out our obligations arising from any contract that we have with you.
- Verify your identity.
- Deal with any complaints you may have.
- Contact you about any changes that we make to our services, events or organisation
- Administer our website, including troubleshooting problems, analysing statistics, conducting research and tests and keeping the site secure.

If you enquire about, or apply for a job vacancy within the Region, it is necessary for us to use your personal information as part of the recruitment process, in order to assess your suitability for a particular role.

## **Telling you about events or other products/services that we think may be of interest to you**

We may use your information to identify and tell you about events and services that we think may be of interest to you. We will only do this where you have informed us that you would like to receive marketing communications.

We may also use your information to contact you regarding invitational courses/programme (e.g. England Talent County/Regional camps or development days). You do not have to participate, and have the ability to decline any invitation.

If you do not wish to receive this information please get in touch using our website or contacting us as set out below.

### **Telling you about products or services that are similar to ones you have already bought**

If you have already contacted us about attending, participating in, or volunteering at, a SENW Ltd events, we may contact you with some information about services and events that are similar.

We will only contact you by email and you can choose not to receive these messages at any time. If you do not wish to receive this information please get in touch using our website or contacting us as set out below.

### **Telling members about the aquatics disciplines (e.g. swimming, diving, synchronised swimming, water polo, masters and open water).**

We will communicate to our members, details of our events and competitions for the purpose of promoting the development of sports and to enable members to participate in the sport at local, regional and national level.

### **Making our organisation better**

We always want to offer the best services, events and experience that we can. Sometimes this means we may use your information to find ways that we can improve what we do, or how we do it.

In this context, we will only use your information where it is necessary so that we can:

- Review and improve our existing services and develop new ones
- Review and improve the performance of our systems, processes and staff (including training)
- Improve our site to ensure that the content is presented in the most effective manner for you and your computer/portable devices.
- Measure and understand the effectiveness of advertising we provide to you and others, and to deliver relevant advertising to you.
- Let you know about any important changes to our business or policies

### **Verify your identity**

We may use your information where it is necessary for us to do so in order to meet our legal obligations or to detect and prevent fraud, money-laundering and other crimes.

### **Protecting you and other from harm**

We may use your information where it is necessary to protect your interests, or the interests of others. This may include in the event of criminality such as identity theft, piracy or fraud.

We need all the categories of information listed above to all us:

- To provide our services to you
- To enable us to comply with legal obligations
- To pursue legitimate interests of our own or those of third parties (provided your interests and fundamental rights do not override those interests)

The situations in which we will process your personal data are listed in the table below and indicate the purpose or purposes for which we are processing or will process your personal information.

	Perform our contract with you	Comply with legal obligations	Pursue legitimate interests
Administration of Development Days (e.g. Skills/Stroke/Coach)			X
Invite selected swimmers onto England Talent Camps			X
Administering your entries into events and competitions			X
Ensure Swim England membership checks which can be found online to ensure that a member is eligible to compete, officiate or volunteer at an event.			X
Competition Results which can be found on the Swim England Rankings systems or SENW Ltd Website			X
Administration for Courses (e.g. Team Manager and Time to Listen)			X
Administration of committee contact details via club profile sheets			X
Verify the identity of individual who carry our work on behalf of the region - Contract/Casual Worker Forms	X		X
Competition or Event Volunteer Expenses Forms			X
Regional Initiatives (e.g. Regional Pathway Programme)			X
Administration of the Young Volunteer Programme			X
Ensure clubs are operating within health and safety regulations (e.g. all personnel have the required qualifications).	X		X
Administration for discipline regional training			X
Invitation onto England Talent led programme (e.g. county/regional/phase 1 camps)			X
Comply with health and safety obligations	X	X	X
To interact and respond to any communications you send us, including social media posts you tag us in			X
To ensure information we hold about you is accurate and up to date.			X
To let you know about any important changes to our business, policies, rules or regulations			X
Dealing with any complaints you may have	X		X
Involvement in Disciplinary Proceedings	X	X	X
Administering grant applications	X		X

## Change of Purpose

We will only use your personal information for the purpose for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Who do we share your personal information with?

### Sharing information within Swim England

We share information that you provide to use with our Regional staff so that we can provide our services to you and to allow use to properly administer the sport of swimming on a local and regional level.

When you sign up to be a member of Swim England, certain details such as your name, year of birth and gender will be visible to other members. You can choose to hide this information by logging onto the Swim England club members' area at [www.swimmingmembers.org](http://www.swimmingmembers.org). If you take part in events your name will appear in the rankings tables unless you have chosen to hide your name.

### Sharing your information with third parties

We may share your data with selected third parties. For example, we may share your information with:

- Internet hosting providers to host the website, related infrastructure, services and applications.
- Contact management systems to send emails, social media messages. When you interact with us on social media platforms, such as Facebook or Twitter, we do not collect any personal data except the aggregated data provided by these social media companies, which includes metrics such as number of visits and clicks, impressions, likes, shares and comments etc. The information we received will depend on the privacy preferences you have set on those platforms.
- Service providers: for example payment processors, supply chain partners and sub-contractors and IT services (including CRM).

There are certain exceptional circumstances in which we may disclose your information to third parties. This would be where we believe the disclosure is:

- Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings
- Necessary to protect the safety of our employees, our property or the public.
- Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction.
- Proportionate as part of a merger, business or asset sale, in the event that this happens we will share your information with the prospective seller or buyer involved.

We require all third parties to respect the security of your personal data, and to treat it in accordance with the law. We do not allow our third-part service providers to use your personal data for their own purposes and only permit them to process your personal data for the specified purposes and in accordance with our instructions.

## How long do we keep your personal information?

We will only store your personal information for as long as we need it for the purposes for which it was collected. Where we provide you with any service, we will retain any information you provide to us at least for as long as we continue to provide that service to you.

In all other circumstances, we will keep all physical and electronic records of your information for a period of 6 years after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to personal injury claims, 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 you have been in contact.

## How do we protect your personal information?

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy.

We try to ensure that all information you provide to use is transferred securely via our regional website, or handled via any other method.

Unfortunately 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 site; 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.

All information you provide to us is stored on our/third party secure servers.

For any paper based systems, your personal information will only be kept for the amount of time required and then will be destroyed. This may include paper entry forms for competition, health and statement forms for events and application forms for regional initiatives and funding.

## What rights do you have in respect of your personal information?

### **You have the right to be informed**

We have a legal obligation to provide you with concise, transparent, intelligible and easily accessible information about your personal information and our use of it. We have written this policy to do just that, but if you have any questions or require more specific information, you can get in touch using the Contact Us section at the end of this document.

### **You have the right to access your personal data**

You have the right to ask us to confirm whether or not we hold any of your personal information. If we do, you have the right to have a copy of you information and to be informed of the following:

- Why we have been using your information
- What categories of information we were using
- Who we have shared the information with
- How long we envisage holding your information

In order to maintain the security of your information, we will have to verify your identity before we provide you with a copy of the information we hold.

The first copy of your information that you request from us will be provided free of charge, if you require further copies we may charge an administrative fee to cover our costs.

### **You have the right to correct any inaccurate or incomplete personal data**

Where you have requested a copy of the information we hold about you, you may notice that there are inaccuracies in the records, or that certain parts are incomplete. If this is the case you can contact us so that we can correct our records.

## **You have the right to be forgotten**

There may be times where it is no longer necessary for us to hold personal information about you. This could be if:

- The information is no longer needed for the original purpose that we collected it for
- You withdraw your consent for us to use the information (and we have no other legal reason to keep using it)
- You object to us using your information and we have no overriding reason to keep using it.
- We have used your information unlawfully
- We are subject to a legal requirement to delete your information.

In those situations, you have the right to have your personal data deleted. If you believe one of these situations applies to you, please get in touch using the contact information documented at the end of this policy.

## **You have the right to have a copy of your data transferred to you or a third party in a compatible format**

Also known as data portability, you have the right to obtain a copy of your personal data for your own purposes. This right allows you to move, copy or transfer your personal data more easily from one IT system to another, in a safe and secure way.

If you would like us to transfer a copy of your data to you or another organisation in a structured, commonly used and machine-readable format, please contact us. There is no charge for you exercising this right.

## **You have the right to object to direct marketing**

You have a choice about whether or not you wish to receive information from us. You can tell us at any time that you would prefer that we do not use your information for direct marketing purposes. If you would not like to receive any direct marketing from us, please contact us or use the links provided to any of our marketing communications, and we will stop sending direct marketing immediately.

## **You have the right to object to us using your information for our own legitimate interests**

Sometimes, we use your personal information to achieve goals that will help us as well as you. This includes:

- When we tell you about services, products or events that are similar to ones that you have already engaged with, bought or attended.
- When we use your information to help us make our business better
- When we contact you to interact, communicate or let you know about changes we are making.

We aim to always ensure that your rights and information are properly protected. If you believe that the way we are using your data is not justified due to its impact on you or your rights, you have the right to object. Unless we have a compelling reason to continue, we must stop using your personal data for these purposes.

In order to exercise your right to object to our use of your data for the purposes above, please contact us.

## **You have the right to restrict how we use your personal data**

You have the right to ask us to stop using your personal data in any way other than simply keeping a copy of it. This right is available where:



- You have informed us that the information we hold about you is not accurate, and we have not yet been able to verify this.
- You have objected to us using your information for our own legitimate interests and we are in the process of considering your objection.
- We have used your information in an unlawful way, but you do not want us to delete your data.
- We no longer need to use the information, but you need it for a legal claim.

If you believe any of these situations apply, please contact us.

### **You have rights related to automated decision-making and profiling**

Any automated decision-making or profiling we undertake is solely for the purpose of tailoring the information which we provide to you. We will not use automated decision-making or profiling to make any decisions which will have a legal effect upon you or otherwise significantly affect you, and you have the right not to be subject to such decisions. If you have any concerns or questions about this right, please contact us.

## Changes to our Privacy Policy

Any changes we make to our privacy policy in the future will be amended on our website, and where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

This version (version 2) was last updated on 04 October 2018 and historic versions can be obtained by contacting us.

## Complaints

If you wish to make a complaint about our collection or use of your personal data, please contact us in the first instance so that we may seek to resolve your complaint.

You have the right to lodge a complaint with the Information Commissioner's Office (ICO), the statutory body which oversees data protection law in the UK. Please visit the [ICO website](#) if you wish to lodge a complaint with the ICO.

## Contact Details

In the event of any query or complaint in connection with the information we hold about you, please email [swimnorthwest@swimming.org](mailto:swimnorthwest@swimming.org) or write to us at SENW Ltd, 2<sup>nd</sup> Floor, 2 City Approach, Albert Street, Eccles, M30 0BL. Any email or letter will then be forwarded onto the Data Protection Lead within SENW Ltd.

## **Appendix**

Activities which we will collect your personal data:

- Skills/Stroke Days
- Coach Development Days
- Team Manager Module 1
- Team Manager Module 2
- Time to Listen
- England Programmes Regional and County Camps
- Regional Pathway Programme
- Young Volunteer Programme
- Discipline Specific Regional Training
- Discipline Specific Officials Training
- Club Profile Sheet
- SwimMark
- Website
- Newsletter
- Contract of Services/Casual Worker forms
- Expenses Forms
- Photography
- Regional Competitions