

Parogon Swimming Club

Data Protection Policy

Introduction

Parogon Swimming Club needs to gather and use certain information about individuals. These include members, volunteers and other people the Club has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the club's data protection standards — and to comply with the law.

Why this policy exists

This data protection policy ensures Parogon Swimming Club:

- Complies with data protection law and follow good practice
- Protects the rights of volunteers, members and others
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Data protection law

The Data Protection Act 1998 and, from May 2018, the General Data Protection Regulation (GDPR) describes how organisations — including Parogon Swimming Club— must collect, handle and store personal information.

The Privacy and Electronic Communications Regulations (PECR) sit alongside the Data Protection Act. They give people specific privacy rights in relation to electronic communications.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act and GDPR are underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

THE GDPR details the following rights:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object;
- the right not to be subject to automated decision-making including profiling.

People, risks and responsibilities Policy scope

This policy applies to:

- Members of the Committee
- All volunteers of Paragon Swimming Club

It applies to all data that the club holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This includes:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Date of birth
- Medical details

Legal basis for holding and using data

The GDPR requires each organisation that holds personal data on individuals to define the legal basis on which they hold and use this data.

The Club primarily holds data for Club members and volunteers and will only use this data for legitimate purposes.

The Club will only hold and use data for legitimate purposes. Hence the Club's legal basis as allowed by the GDPR is "Legitimate Interest".

The absolute minimum data required for the Club to carry out its membership activities are member names, dates of birth and postal addresses & medical information. Email addresses and telephone numbers assist the Club carry out its membership activities efficiently and economically. Accordingly members are asked to provide their email addresses and telephone numbers if they are happy for the Club to use them.

Data protection risks

This policy helps to protect Paragon Swimming Club from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the club contacts them for legitimate reasons i.e. membership renewal, club AGM notification etc.
- **Reputational damage.** For instance, the club could suffer if hackers successfully gained access to sensitive data.

Responsibilities

Everyone who works for or with Paragon Swimming Club has some responsibility for ensuring data is collected, stored and handled appropriately. Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The **Committee** is ultimately responsible for ensuring that Henleaze Swimming Club meets its legal obligations.
- **Secretary & Membership Secretary**, are responsible for:

- Keeping the Committee updated about data protection responsibilities, risks and issues.
- Reviewing all data protection procedures and related policies, in line with an agreed schedule.
- Arranging data protection training and advice for the people covered by this policy.
- Handling data protection questions from volunteers, members and anyone else covered by this policy.
- Dealing with requests from individuals to see the data Paragon Swimming Club holds about them (also called 'subject access requests').

Volunteer guidelines

- The only people able to access data covered by this policy are those who need it for their work.
- Data must not be shared informally. When access to personal data is required volunteers & committee can request it from the Secretary.
- Volunteers must keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they must never be shared.
- Personal data must not be disclosed to unauthorised people, either within the club or externally.
- Data must be regularly reviewed and updated if it is found to be out of date. If no longer required, it must be deleted and disposed of.
- Volunteers must request help from the General manager if they are unsure about any aspect of data protection

Data storage

This section describes how and where data must be safely stored. Questions about storing data safely can be directed to the Secretary.

When data is **stored on paper**, it must be kept in a secure place where unauthorised people cannot see it.

This includes data that is usually stored electronically but has been printed out:

- When not required, the paper or files must be kept in a secure location.
- Volunteers must make sure paper and printouts are not left where unauthorised people could see them.
- Data on paper must be shredded and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data must be protected by strong passwords that are changed regularly and never shared.
- If data is stored on removable media (like a CD or DVD), these must be kept locked away securely when not being used.
- Data must only be uploaded to approved cloud computing services.
- Data must be backed up frequently. The use of cloud storage constitutes a backup for the purpose of this policy

Data use

Personal data is of no value to Parogon Swimming Club unless the Club can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, volunteers must ensure the screens of their computers are always locked when left unattended.
- Personal data must not be shared informally.
- Personal data must never be transferred outside of the European Economic Area.
- Personal data must always be accessed and update using the central copy of any data.
- Personal data must only be saved on the club cloud account.

Data accuracy

The law requires Parogon Swimming Club to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Parogon Swimming Club must put into ensuring its accuracy.

It is the responsibility of all volunteers who work with personal data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Volunteers must not create any unnecessary additional data sets.
- Volunteers must take every opportunity to ensure data is updated. For instance, by confirming a member's details when they contact the Club.
- Parogon Swimming Club will make it easy for data subjects to update the information Parogon Swimming Club holds about them. For instance, via the membership renewal process.

- Data must be updated as inaccuracies when discovered. For instance, if a member can no longer be reached on their stored telephone number or email address, it must be removed from the database.
- Members who unsubscribe from email communication must never be contacted by this method and any email information must be removed from Club records.

Subject access requests

All individuals who are the subject of personal data held by Paragon Swimming Club are entitled to:

- Know what information the club holds about them and why.
- Know how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the club is meeting its data protection obligations

If an individual contacts the club requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email or letter, addressed to the Secretary.

The Club will respond to subject access requests free of charge. However, the Club reserves the right to charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive. The fee charged will be based on the administrative cost of providing the information.

The Secretary will always verify the identity of anyone making a subject access request before handing over any information.

Disclosing data for other reasons

In certain circumstances, the data protection legislation allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Paragon Swimming Club will disclose requested data. However, the Secretary will ensure the request is legitimate, seeking assistance from the Club's Chair and Treasurer.

Personal data breach

If there is an actual or suspected personal data breach this must be reported to the Secretary without delay. The Secretary will investigate and determine what action is necessary.

If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, Parogon Swimming Club will:

- Take action to prevent any further data breaches
- Inform those people adversely effected without delay
- Document the data breach and actions taken
- If appropriate, inform the Information Commissioner's Office within 72hours.
- If relevant, instigate disciplinary proceedings.

Providing information

Parogon Swimming Club aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

Please see club website for further details.

Electronic Communication

- Email communications will only be used where a person has provided the Club with their email address.
- Having provided an email address and/or telephone number, a member can have those details removed from the Club's records at any time. Individuals are prompted to correct and add or remove details when they join the Club and when they renew their membership.
- For those choosing not to receive emails from the Club, information will be provided on the Club's website and notices at the pool. Membership applications will be sent by post to these individuals.
- Emails to members from the Club will include an 'unsubscribe' option.
- Blind copy must be used for member, volunteer group and event participant emails.
- All Club emails must include information about the Club's privacy policy

Appendix A - Member privacy statement

Paragon Swimming Club takes your privacy seriously and we will only use your personal information for legitimate Club purposes, which may include some or all of the following: administer your membership, keep you informed about Club news, events and fund raising, projects and activities, volunteering opportunities. We will not pass your personal information to third parties except when legally required to do so. We will keep your personal information for 2 years after your membership has lapsed. It is efficient and economical for the Club to contact you by email or telephone. However, we will only contact you by email or telephone if you have provided the Club with those details. Further information regarding our data protection policy can be obtained by contacting the Club directly or from our website (www.paragon.com).

Email footer

This email & its attachments are intended solely for the use of the individual to whom it is addressed. If you are not the intended recipient you must take no action based upon its contents, nor must you copy or share it with anyone. Please contact the sender if you believe you have received this email in error.

If you wish to unsubscribe from these emails please reply stating unsubscribe and your email will be removed from the database.

Privacy Policy - Website

Data Protection Policy

The Club's Data Protection Policy and related documents can be accessed below:

- [Paragon Data Protection Policy](#)

Website Privacy

This privacy statement sets out how Paragon Swimming Club uses and protects any information that you give Paragon Swimming Club when you use this website. Paragon Swimming Club is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

Paragon Swimming Club may change this statement from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from January 2019.

Contact form

The contact form on our website is used to collect the following information:

- name and email address
- telephone number – optional data field
- the details of your enquiry

The contact form uses electronic mail to send your enquiry to Paragon Swimming Club volunteers. Your contact details are used only to respond to your enquiry and are not shared with any third party.

How we use cookies

A cookie is a small file which is placed on your computer's hard drive when you use a website.

We use a traffic logging cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website for visitors. We only use this information for statistical analysis purposes. No personal information is collected or stored.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.