

PRIVACY NOTICE

FRAMLINGHAM COLLEGE SPORTS CENTRE & COMMUNITY SWIMMING

WHO WE ARE

Framlingham College Sports Centre and Community Swimming, as part of Framlingham College ('the School') is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we hold on you as a member of Framlingham College Sports Centre and Community Swimming. It also sets out how we use that information, how long we keep it for and other relevant information about your data. This notice applies to new, current and former members.

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how Framlingham College Sports Centre and Community Swimming will use (or "process") personal data about: current, past and new members of Framlingham College Sports Centre and Community Swimming ("members").

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Members are encouraged to read this Privacy Notice and understand Framlingham College Sports Centre's and Community Swimming's obligations to its entire community.

This Privacy Notice applies alongside any other information Framlingham College Sports Centre and Community Swimming or the school may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to any other relevant terms and conditions and policies, including:

- any contract between Framlingham College Sports Centre, Community Swimming and its members;
- the school's CCTV and/or biometrics policy;
- Framlingham College Sports Centre and Community Swimming, and the School's health and safety policies.

RESPONSIBILITY FOR DATA PROTECTION

- The school is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows: Framlingham College, College Road, Framlingham, Suffolk, IP13 9EY.
- The school has appointed the the Bursar as Compliance Officer, endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law and oversee requests and enquiries concerning the school's uses of personal data.

DATA PROTECTION PRINCIPLES

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed.

WHY FRAMLINGHAM COLLEGE SPORTS CENTRE AND COMMUNITY SWIMMING NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to its members, Framlingham College Sports Centre and Community Swimming needs to process a range of personal data about individuals (including current, past and new members) as part of its daily operation.

Some of this activity Framlingham College Sports Centre and Community Swimming will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract.

Other uses of personal data will be made in accordance with legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

When you join as a member you give your consent for your data to be used:

- For the purposes of membership registration;
- To make use of photographic images of members in the school's publications, on the school's webpages and (where appropriate) on Framlingham College Sports Centre and Community Swimming's social media channels;
- For security purposes, including CCTV in accordance with the school's CCTV policy;

Framlingham College Sports Centre and Community Swimming expects that the following uses will fall within that category of its "legitimate interests":

- Maintaining relationships with past members, including direct marketing or other similar activity;
- To ensure the member is undertaking the appropriate level of exercise;
- For the purposes of management planning and forecasting, research and statistical analysis;

TYPES OF PERSONAL DATA PROCESSED BY FRAMLINGHAM COLLEGE SPORTS CENTRE & COMMUNITY SWIMMING

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- digital scan of fingerprint;
- bank details for fees payable to Framlingham College Sports Centre and Community Swimming;
- where appropriate, information about individuals' health and welfare, and contact details for their
- next of kin;
- correspondence with and concerning members past and present; and
- images of members (and occasionally other individuals) engaging in Framlingham College Sports Centre and Community Swimming activities, and images captured by the school's CCTV system (in accordance with the School's CCTV policy).

HOW FRAMLINGHAM COLLEGE SPORTS CENTRE & COMMUNITY SWIMMING COLLECTS DATA

Generally, Framlingham College Sports Centre and Community Swimming receives personal data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication (such as email or telephone call).

WHO HAS ACCESS TO PERSONAL DATA AND WHO FRAM LESIURE & COMMUNITY DWIMMING SHARES IT WITH

For the most part, personal data collected by Framlingham College Sports Centre and Community Swimming will remain within Framlingham College Sports Centre and Community Swimming, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- Medical records [held and accessed only by Framlingham College Sports Centre's General Manager, Duty Managers, Assistant Duty Managers and the Head of Swimming]; and
- Banking details [held and accessed only by Framlingham College Sports Centre's General Manager, Duty Managers,

Assistant Duty Managers and the Head of Swimming].

Finally, in accordance with Data Protection Law, some of Framlingham College Sports Centre and Community Swimming's processing activity is carried out on its behalf by third parties, such as off-site storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

HOW LONG DO WE KEEP PERSONAL DATA

Framlingham College Sports Centre and Community Swimming will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, we will keep ordinary member files for no longer than 6 years after cancellation of membership from Framlingham College Sports Centre and Community Swimming.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Compliance Officer. However, please bear in mind that Framlingham College Sports Centre and Community Swimming may have lawful and necessary reasons to hold on to some personal data even following such request.

YOUR RIGHTS

- **Rights of Access etc**

Individuals have various rights under Data Protection Law to access and understand personal data about them held by Framlingham College Sports Centre and Community Swimming, and in some cases ask for it to be erased or amended, or for Framlingham College Sports Centre and Community Swimming to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or who has some other objection to how their personal data is used, should put their request in writing to the Compliance Officer. Framlingham College Sports Centre and Community Swimming will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

- **Requests that cannot be fulfilled**

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and members need to be aware this may include their own children).

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

- **Consent**

Where Framlingham College Sports Centre and Community Swimming is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Examples where we may rely on consent are: certain types of uses of images and certain types of marketing activity. Please be aware however that Framlingham College Sports Centre and Community Swimming may not be relying on consent but have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual.

- **Whose rights?**

The rights under Data Protection Law belong to the individual to whom the data relates.

Members are required to respect the personal data and privacy of others, and to comply with the School's rules.

DATA ACCURACY AND SECURITY

Framlingham College Sports Centre and Community Swimming will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the Compliance Officer of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law).

See above for details of why Framlingham College Sports Centre and Community Swimming may need to process your data, of who you may contact if you disagree.

Framlingham College Sports Centre and Community Swimming will take appropriate technical and organisational steps to ensure the security of personal data about individuals. Staff will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

THIS POLICY

Framlingham College Sports Centre and Community Swimming will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Compliance Officer at Framlingham College, College Road, Framlingham, Suffolk, IP13 9EY. Tel: 01728 723789.

If an individual believes that Framlingham College Sports Centre and Community Swimming has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the school's complaints, grievance procedure and should also notify the Compliance Officer. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with Framlingham College Sports Centre and Community Swimming before involving the regulator.

October 2019