



**BARRACUDA SWIMMING CLUB**  
**PRIVACY NOTICE AS ADAPTED FROM SWIM IRELAND MAY 2018 GDPR POLICY**  
**SWIM IRELAND MEMBERS/VOLUNTEERS/CUSTOMERS/PARTICIPANTS**

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership or your child's membership with us and/or your relationship with us as a Member/Volunteer/Customer/Participant. This Privacy Notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

This notice applies to you if you are either:

1. an individual Swimmer / participant of Swim Ireland who has registered as a member of Barracuda Swimming Club and/or whose details we have collected from you directly or another other third-party referral;
2. an individual participant in one of our events/programmes who is not a member of our club but whose details we have collected from you directly.
3. a coach, technical official, teacher, team manager, committee member, volunteer who has registered for membership; or
4. a customer, participant or supporter of Barracuda Swimming Club who has contacted us to inquire about membership, signed up for any of our training camps and/or education programmes and/or signed up to receive updates about upcoming events, offers and ways to get involved further with our club..

References to '**we**', '**our**' or '**us**' in this Privacy Notice are to "Barracuda Swimming Club", Castle Park Swim Academy, Castle Park Road, Dalkey, Co.Dublin.

We have not appointed a Data Protection Officer to oversee our compliance with Data Protection laws as we are not required to do so, but our Data Protection Compliance Committee 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.

## **1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

When you sign up for membership with us or for your child, or as a volunteer with us, or as a customer/participant for one of our programmes, you may provide us with or we may obtain personal information about you or your child, such as information regarding your or your child:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth; gender;
- details of family members and emergency contacts; bank account details for payment of any out of pocket expenses; records of your volunteering history; any identification documents;
- all information included as part of the volunteering application or education process; referee details and any references provided;
- performance including any feedback provided to us by yourself, members of staff or other third parties; the location in which you are volunteering;
- use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- membership details including start and end date;



- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- information obtained through electronic means such as records of your attendance at any events or Time Trials hosted by us: images in video and/or photographic form.

### **Players/Participants**

If you are a Swimmer / participant who has registered his/her interest in participating in the sport competitively, you may also provide us with or we may obtain the following additional **personal information** from you:

- identification documents such as passport and identity cards; details of any club membership and school/university being attended; details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any player rankings, gradings or ratings, competition results, details regarding events/games attended and performance (including that generated through player pathway programme);
- any disciplinary and grievance information;
- any details required for the purposes of awarding scholarship/s.

### **Coaches/Teachers, Officials/Team Managers, Customers, Participants**

If you have registered as a Club Coach, we may obtain the following additional **personal information** from you:

any coaching code or official number; your current affiliated club or other organisation (if applicable); coaching/teaching qualification and/or officiating history (if any); accreditation/qualification start and end date.

Identification documents such as passport, driving licence, identity cards, etc.

## **2. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information;
- biometric information about you, for example fingerprints, retina scans; and ○ information about your criminal history, if any.

We may not collect all the above types of special category personal information about you. In relation to the special category personal data that we do 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.

In the table below, we refer to these as the “special category reasons for processing of your personal data”.

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

## **3. WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members/volunteers/customers/participants when you become a member/volunteer/customer/participant of Swim Ireland / Barracuda Swimming Club or engage



with us, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are a Swimmer / participant we also may collect personal information about you from any club, school or other organisation you are affiliated with or from other referrals such as from coaches.

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 how 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 the “Your rights in relation to personal information” section below.

#### 4. USES MADE OF THE INFORMATION

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.

<b>All Members/Volunteers/Customers/Participants</b>		
<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b>Making a decision about your appointment as a volunteer and managing the appointment process</b>	All the personal information we collect from you as part of the application process. Records of volunteering history. Referee details and any references.	We need this information to be able to perform and administer your relationship with us as a volunteer.
<b>Paying you for any out of pocket expenses</b>	Transaction and payment information.	Where you have given us your consent to do so.
<b>Dealing with legal disputes involving you, or any other volunteers, including accidents</b>	All non-‘special categories’ of personal information.	We have a legitimate interest to ensure that all legal claims are managed effectively.  We also have a legal obligation to report any accidents at a workplace in accordance with health and safety legislation.
<b>To prevent and detect criminal or improper acts</b>	Identification documents.	We may have a legal obligation to do so; otherwise we have a legitimate business interest to protect our organisation against criminal or improper acts.
<b>Storage of records relating to you and also records relating to our organisation</b>	All non-‘special categories’ of personal information.	We need this information to be able to fulfil our obligations to you.



**Swim Ireland: Data Protection - Privacy Notice for Swim Ireland  
Members/Volunteers/Customers/Participants**

<p><b>To send you information we think that you might find useful or which you have requested from us, including our newsletters, information about volunteering opportunities and other ways of supporting our club or the sport, provided that you have indicated that you are happy to be contacted for these purposes.</b></p>	<p>Personal contact details such as name, title, email addresses and telephone numbers.</p>	<p>Where you have given us your consent to do so.</p>
<p><b>To arrange and administer your attendance at an event for which you have volunteered.</b></p>	<p>Personal contact details. Details of family members and emergency contacts.</p>	<p>This is necessary to enable us to register you on to and properly manage and administer your attendance at the event.</p>
<p><b>To assess your performance as a volunteer</b></p>	<p>Performance including any feedback provided to us by yourself, members of staff or other third parties.</p>	<p>We may have a legitimate interest to ensure your suitability for any future volunteering roles and to ensure that your volunteering experience with us is positive and worthwhile.</p>
<p><b>To administer any membership account/s you have with us and managing our relationship with you, (including arranging for any insurance) and dealing with payments and any support, service or product enquiries made by you</b></p>	<p>All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.</p>	<p>This is necessary to enable us to properly manage and administer your membership contract with us.</p>
<p><b>To arrange and manage any contracts for the provision of any merchandise, products and/or services.</b></p>	<p>All contact and membership details. Transaction and payment information.</p>	<p>This is necessary to enable us to properly administer and perform any contract for the provision of merchandise/products/services.</p>
<p><b>To send you information which is included within your membership package, including details about your insurance, competitions and events, partner offers and discounts and any updates on the organisation, events, programmes available.</b></p>	<p>All contact and membership details</p>	<p>This is necessary to enable us to properly manage and administer your membership contract with us.</p>
<p><b>To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about Membership, events, participation products and information about our regions and National Governing Body.</b></p>	<p>All contact and membership details and marketing preferences.</p>	<p>We have a legitimate interest in ensuring that you are informed about the club and what is going on.</p>
<p><b>To answer your queries or complaints</b></p>	<p>Contact details and records of your interactions with us.</p>	<p>We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership/relationship with us.</p>



**Swim Ireland: Data Protection - Privacy Notice for Swim Ireland  
Members/Volunteers/Customers/Participants**

<b>Retention of records</b>	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership/relationship
		and in some cases, we may have legal or regulatory obligations to retain records.  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.  For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
<b>To arrange, administer and manage your involvement in one of our programmes, events, for which you have registered</b>	All contact and membership details. Transaction and payment information.	This is necessary to enable us to properly administer and perform any contract for the provision of services.
<b>The security of our IT systems</b>	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
<b>To conduct data analytics studies to better understand event attendance and trends within the club and the sport</b>	Records of your attendance at any events or competitions.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
<b>For the purposes of promoting the sport, our events and membership packages.</b>	Images in video and/or photographic form.	We have a legitimate interest in ensuring that you are informed about the club and what is going on.
<b>To comply with health and safety requirements</b>	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our club with a safe environment in which to participate in sport.
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with Barracuda SC / Swim Ireland safeguarding requirements</b>	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
<b>Swimmers / Participants</b>		
<b>To conduct performance reviews, manage performance and determine performance requirements and administer your development and training requirements on any pathway programme</b>	All performance and attendance data and information about your health and medical condition.  Details of any affiliated club membership.	This is necessary to enable us to properly manage and administer your development through the performance programme.  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.



**Swim Ireland: Data Protection - Privacy Notice for Swim Ireland  
Members/Volunteers/Customers/Participants**

<p><b>To make decisions about your progression and development through any pathway programme and to assist with the delivery of rankings and ratings</b></p>	<p>All performance and attendance data and information about your health.</p> <p>Details of any affiliated club membership.</p>	<p>This is necessary to enable us to properly manage and administer your development through the performance programme.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal</p>
		<p>data” referred to in section 2 above.</p>
<p><b>To administer and monitor your attendance at events and competitions</b></p>	<p>All non-medical performance and attendance data.</p> <p>Details of any affiliated club membership.</p>	<p>This is necessary to enable us to register you on to and properly manage and administer your development through the performance programme.</p>
<p><b>To arrange for any trip or transportation to and from an event</b></p>	<p>Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.</p>	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p><b>To facilitate the collection of drug and alcohol testing by the National Governing Body Swim Ireland or Fina Anti-doping requirements.</b></p>	<p>Health and medical information</p>	<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p><b>To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate, to provide appropriate adjustments to our sports facilities and to monitor and manage sickness absence</b></p>	<p>Health and medical information</p>	<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p><b>To gather evidence for possible grievance or disciplinary hearings</b></p>	<p>All the personal information we collect including any disciplinary and grievance information.</p>	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p><b>To facilitate the provision of assess for your eligibility for any scholarship funding and/or grants to Swim Ireland or Sport Ireland</b></p>	<p>All details required for the purposes of awarding scholarship funding or grants (including means testing)</p>	<p>This is necessary to enable us to properly facilitate the administration and performance of any contract for the provision of funding.</p>



<b>Coaches / Officials</b>		
<b>To administer your attendance at any courses or programmes you sign up to</b>	All contact and other details, transaction and payment data. Details of your current affiliated club or other,	This is necessary to enable us to register you on to and properly manage and administer your development through the course and/or programme.
	coaching/teaching qualifications and/or officiating history.	
<b>To facilitate the conducting of performance reviews, managing performance and determining performance requirements by the National Governing Body Swim Ireland.</b>	All performance and attendance data and information about your health.  Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history.  Qualification start and end dates.	This is necessary to enable us to properly facilitate the management and administration of your development through the course and/or programme.  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b>	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
<b>To facilitate the administration of any drug and alcohol testing required by The National Governing Body Swim Ireland.</b>	Health information	We have a legal obligation and a legitimate interest to provide you & other members of our organisation with a safe environment in which to participate in sport.  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>To arrange for any trip or transportation to and from an event</b>	Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event.  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or at one of our events or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your



position as a member or not allow you to participate on our course / programme /event. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting Us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

## 5. **MARKETING**

**Email and Post Marketing:** from time to time, we may contact you by email, post or other means with information about products and services that we deliver that we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by contacting us at [privacy@barracudaswimmingclub.com](mailto:privacy@barracudaswimmingclub.com) You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

## 6. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We may share personal information with the following parties: **Any party approved by you.**

- **To our staff, coaches, officials, managers:** to allow them to properly administer the sport on a local, regional and national level.
- **Other service providers:** eg. payment processors, data analysis, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
- **Our National Governing Body Swim Ireland and affiliated Regional Bodies, Swim Connacht, Swim Munster and Swim Ulster, International Governing Bodies, International Clubs and Sporting Bodies for Competitions and Away Trips as necessary.**
- **The Government or our Regulators (for example: Sport Ireland, Coaching Ireland, Institute of Sport, Sport NI Institute):** where we are required to do so by law; or for the purposes of funding requirements or/and to avail of their services; or/and 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.

We do not disclose personal information to anyone else except as set out above.

## 7. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect may be transferred to and stored in countries outside of Ireland and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this Privacy Notice and applicable data protection laws and is respected and kept secure and where a third part processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "**Contacting Us**" section below.



## 8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

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. Generally, where there is no legal requirement we retain all physical and electronic records for a period of six 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 involved with us.

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.

## 9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

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.

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

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 Data Protection Commissioner's (DPC) website at <https://www.dataprotection.ie/docs/GDPR/1623.htm> or if you are based in Northern Ireland at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting Us**" section below.

If you are unhappy with the way we are using your personal information, you can also complain to the Data Protection Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

## 10. CHANGES TO THIS NOTICE

We may update this Privacy Notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. 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.



## 11. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email [privacy@barracudaswimmingclub.com](mailto:privacy@barracudaswimmingclub.com) or write to us: Barracuda Swimming Club Data Protection, Castle Park Swim Academy, Castle Park Road, Dalkey, Co.Dublin

Louise Doyle. (Committee Secretary)

**On behalf of Barracuda Swimming Club**