



Sandford Lido Ltd & Sandford Parks Lido (Trading) Ltd

Privacy Notice for Volunteers

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 relationship with us a volunteer. This notice applies to current and former volunteers and this notice is not a contract of employment or other contract to provide services. This 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

References to **we**, **our** or **us** in this privacy notice are to Sandford Lido Ltd co No 03128079 charity No 1052202 Registered ICO Number: ZA380678 and Sandford Parks Lido (Trading) Ltd co No 03177909 Registered ICO Number: ZA380822. Address Sandford Parks Lido, Keynsham Road, Cheltenham, GL53 7PU

We have appointed a Data Protection Officer to oversee our compliance with data protection laws and they have 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

When you sign up to become a volunteer with us, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- o personal contact details such as name, title, addresses, telephone numbers, and personal email addresses and emergency contact details;
- o date of birth;
- o gender;
- o details of family members and emergency contacts;
- o bank account details for payment of any out of pocket expenses;
- o records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- o records of your volunteering history;
- o any identification documents;
- o all information included as part of the volunteering application process;
- o referee details and any references provided;
- o performance including any feedback provided to us by yourself, members of staff or other third parties;
- o the location in which you are volunteering;
- o movements though CCTV footage and other information obtained through electronic means such as key fob records;
- o 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;
- o images in video and/or photographic form and voice recordings;
- o your marketing preferences so that we know whether and how we should contact you;

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

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

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

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

- o the processing is necessary for reasons of substantial public interest, on a lawful basis;
- o it is necessary for the establishment, exercise or defence of legal claims;
- o 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
- o 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 volunteers through the application process, directly from you. We may sometimes collect additional information from third parties including former clubs or other organisations you may have volunteered for or via background check agencies. We will also collect additional personal information throughout the period of you volunteering for us and when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way

We also may collect personal information about you from any third party references you provide as part of the application process for becoming a volunteer or from any feedback provided to us about your performance as a volunteer.

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 YOUR PERSONAL 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.

<i>Purpose</i>	<i>Personal information used</i>	<i>Lawful basis</i>
Non- ‘special categories’ of Personal Information		
Making a decision about your appointment as a volunteer and managing the appointment process	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 contract with us as a volunteer.

To produce and maintain our website and any external marketing campaigns in order to promote volunteer opportunities and to recognise the value created by our volunteers across the sports network	Images in video and/or photographic form and voice recordings	Where you have given us your consent to do so.
Paying you for any out of pocket expenses	Transaction and payment information.	We need this information to make any out-of-pocket expense payments to you.
Assessing experience for a particular role or task	Records of your volunteering history. All information included as part of the volunteering application process.	We have a legitimate business interest to ensure that our volunteers are suitable for the role.
Complying with health and safety obligations	Movements though CCTV footage & other information obtained through electronic means.	We have a legal obligation to comply with Health and Safety laws.
Dealing with legal disputes involving you, or any other volunteers, including accidents	All non-'special categories' of personal information	We have a legitimate business 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 laws.
For the purposes of ensuring the security of our systems and information as well as member/customer information	Movements though CCTV footage & other information obtained through electronic means. Use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use.	We have a legitimate business interest in ensuring our systems are secure.
To prevent and detect criminal or improper acts	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.
Storage of records relating to you and also	All non-'special categories' of personal information	We need this information to be able to fulfil our contract with you.

records relating to our organisation		
To send you information we think you might find useful or which you have requested from us, including our newsletters, information about volunteering opportunities and other ways of supporting our organisation or the sport, provided you have indicated that you are happy to be contacted for these purposes.	Personal contact details such as name, title, email addresses and telephone numbers	Where you have given us your consent to do so.
To arrange and administer your attendance at an event you have volunteered for	Personal contact details. Details of family members and emergency contacts.	This is necessary to enable us to register you on to and properly manage and administer your attendance at the event.
For the purposes of equal opportunities monitoring	Name, title, date of birth; gender, location of volunteering.	We may have a legal obligation to do so and we have a legitimate interest in doing so to make sure our organisation is offering fair volunteering opportunities to everyone.
To assess your performance as a volunteer	Performance including any feedback provided to us by yourself, members of staff or other third parties.	We 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.
'Special categories' of Personal Information and Criminal Records For all of these items consent will be requested where required.		
Storage of records relating to you and also records relating to our organisation.	All 'special categories' of personal information.	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 drug and alcohol testing and to assess your suitability for any activities or events we host.	Information about your health, including any medical condition, health and sickness records, medical records and health professional information.	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>To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to provide appropriate adjustments to our sports facilities.</p>	<p>Information about your health, including any medical condition, health and sickness records, medical records and health professional 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>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</p>	<p>Information about your criminal convictions and offences.</p>	<p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>

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 volunteer or we may not be able to properly perform our arrangements with you or comply with legal obligations and we may have to terminate your position as a volunteer. 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 arrangements with you as a volunteer.

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 withdraw 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 benefits to you as a volunteer.

5. DIRECT MARKETING

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about products and services 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 emailing swim@sandfordparksido.org.uk. 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 share personal information with the following parties:

- o **Any party approved by you.**
- o **To any governing bodies or regional bodies for the sports covered by our organisation:** to allow them to properly administer the sports on a local, regional and national level.
- o **Other service providers:** for example, payment processors, data analysis, CCTV contractors and IT services (including CRM, website, video- and teleconference services);

- **Our Commercial Partners:** for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners
- **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.
- Providing references to future employers or organisations you may wish to volunteer for.

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 is not transferred to and stored in countries outside of the UK and the European Union.

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 6 years (if you are currently volunteering with us, this may be for 6 years after you last volunteered for us). Exceptions to this rule are:

- CCTV records which are held for no more than 15 days unless we need to preserve the records for the purpose of prevention and detection of crime; and
- Information that may be relevant to personal injury claims may be retained until the limitation period for those types of claims has expired. For personal injury claims this can be an extended period as the limitation period might not start to run until a long time after you have volunteered for us.

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 Information Commissioner's website 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 UK Information 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 swim@sandfordparkslido.org.uk or write to us at Business Administrator, Sandford Parks Lido, Keynsham Road, Cheltenham, GL53 7PU

Version 1 dated 23rd May 2018