



# Data Protection Policy

## Introduction

This Data Protection Policy sets out how Sandwell Aquatics Club - Registered Charity №: 1147581, collects, processes, stores, and protects personal data. We are committed to complying with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and any other relevant legislation. This policy applies to all staff, volunteers, trustees, and members who handle personal data on behalf of Sandwell Aquatics Club.

## Scope

This policy covers all personal data collected and processed by Sandwell Aquatics Club, including data received via email, website forms, and stored within our membership system.

## Definitions

- Personal Data: Any information relating to an identified or identifiable individual.
- Processing: Any operation performed on personal data, such as collection, storage, use, or deletion.
- Data Subject: The individual whose personal data is being processed.
- Data Controller: The organisation that determines the purposes and means of processing personal data.
- Data Processor: Any person or organisation that processes data on behalf of the data controller.

## Data Collection

We collect personal data from individuals via the following means:

- Email: Information received in emails sent to Sandwell Aquatics Club's official email addresses or email addresses of appointed staff, volunteers and trustees
- Website Forms: Data submitted through forms on our official website, including membership applications, event registrations, and contact enquiries.
- Membership System: Data stored in our secure membership management system, including names, contact details, and membership information.

## Purpose of Data Processing

Personal data is collected and processed for the following purposes:

- Managing membership records and communications.
- Organising and administering club events and activities.
- Responding to enquiries and requests for information.
- Complying with legal and regulatory obligations.

## Lawful Basis for Processing

We process personal data on the following lawful bases:

- Consent: Where individuals have given clear consent for us to process their data for specific purposes.
- Contract: When processing is necessary for the performance of a contract with the data subject.
- Legal Obligation: When processing is necessary to comply with the law.
- Legitimate Interests: When processing is necessary for our legitimate interests, provided these are not overridden by the data subject's rights.



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## Data Storage and Security

Personal data is stored securely in our membership system and protected by appropriate technical and organisational measures, including:

- Password protection and access controls.
- Regular data backups.
- Encryption of sensitive data where appropriate.
- Secure transmission protocols for email and website forms.

Access to personal data is restricted to authorised personnel only.

## Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by law. Data will be securely deleted or anonymised when no longer needed.

## Data Subject Rights

Individuals have the following rights under UK GDPR:

- Right to be informed about how their data is used.
- Right of access to their personal data.
- Right to rectification of inaccurate or incomplete data.
- Right to erasure ('the right to be forgotten').
- Right to restrict processing.
- Right to data portability.
- Right to object to processing.

Requests to exercise these rights should be made in writing to the charity's Data Protection Officer (DPO).

## Data Sharing and Disclosure

We do not share personal data with third parties except where required by law, or where necessary for the operation of the club (e.g., sharing information with event organisers or IT service providers under appropriate data processing agreements).

## Data Breach Procedure

In the event of a personal data breach, the club will follow the required legal procedures, including notifying the Information Commissioner's Office (ICO) and affected individuals when necessary.

## Training and Awareness

All staff, volunteers, and trustees will be provided with training on data protection principles and procedures.

## Review and Updates

This policy will be reviewed annually and updated as required to reflect changes in legislation or charity operations.

## Contact Details

For questions or concerns regarding this policy or your personal data, please contact our Data Protection Officer at: [hello@sandwellaquatics.org](mailto:hello@sandwellaquatics.org)