

## **North Lincs Rotary Swimarathon Charitable Incorporated Organisation Data Protection Privacy Policy Notice**

North Lincs Rotary Swimarathon Charitable Incorporated Organisation (“we”) promise to respect the confidentiality of any personal data you share with us, to keep it safe, and we will always take every effort to protect your privacy

We pride ourselves on our honesty and openness and will always be clear how, when and why we collect and process your information; we promise we will never do anything with your details that you wouldn’t reasonably expect.

### **We collect information in the following ways:**

#### **When you give it to us DIRECTLY**

There are many ways you may give us your information. For example, when you submit your Team entry, apply for grants, make a donation, communicate with us either by phone, in writing, including email or in person. We are responsible for your data at all times.

#### **When you give it to us INDIRECTLY**

Your information may be shared with us by independent organisations, for example sites like Virgin Money Giving or BT MyDonate or other such services. These independent third parties will only share your information when you have consented. You should check their Privacy Notice when you provide your information to understand fully how they will process your data.

This could also be when you sponsor a swimmer, particularly if you have Gift Aided your sponsorship.

#### **Via information available publicly**

This may include information found in places such as websites, Facebook, and information that has been published in articles/newspapers.

#### **What personal information we collect and how we use it**

We will only ever capture the minimum amount of information that we need to in relation to the Swimarathon event. The personal data we will usually collect is:

- Your name
- Your contact details: address, telephone number, email address.

Where it is appropriate, we may also ask for additional information which will be explained to you at the time. In particular we will ask for bank details in respect of grant applications, for the beneficiary organisation.

#### **How we will use your data**

We will use your personal data for the legitimate interest of conducting core business activities, these will include:

- Administer your donations, including processing Gift Aid
- Provide you with the services, products or information you asked for.
- Communicating messages and information to Team Captains and Awardee applicants.
- Keep a record of your relationship with us
- For any other purposes with your consent

## **Data Sharing**

In the course of our legitimate business activities, there may be a need for us to share, or give access to, your personal data to third parties that provide us with services or host our applications/software that you may access, for instance:

- Banking organisations – those that provide our banking/payment services
- HMRC – for Gift Aid claims

We will ensure that data processing agreements, compliant to GDPR, are in place before sharing with, or giving access to, your data with any of our service/host providers.

## **How we keep your information safe and who has access to it**

We ensure that there are appropriate physical and technical controls in place to protect your personal details.

We review who has access to information that we hold to ensure that your personal information is only accessible by appropriate members of our organisation.

We have a duty to report certain types of personal data breaches to the relevant supervisory authority, and where feasible, we will do this within 72 hours of becoming aware of the breach. If a breach is detected and likely to result in a high risk of adversely affecting you, we will inform you without undue delay.

## **Where we store your information**

Information is retained in electronic format on PCs and Laptops of a very limited number of our officers. These devices are password protected and can only be accessed by those officers.

Paper records such as Team Entry Forms, sponsorship forms and parental consent forms are retained by two of our officers in secure environments, and are only available to those officers.

## **How long we retain your information**

We will only keep your information for as long as we need to, in particular:

Hard copy Team entry forms will be cross cut shredded and placed in paper waste within 14 days of the Grants Awards Evening.

All digital records will be deleted after a maximum 6 year period, and much sooner if we don't plan to use it again, other than email addresses which we could keep on a database for future contact. Email addresses and telephone contact details for our members will be retained for as long as you are a member.

Sponsor forms will be retained for 6 years to comply with Gift Aid claim rules. After 6 years have elapsed they will be cross cut shredded and placed in paper waste

Hard copy Junior Consent forms will be cross cut shredded and placed in paper waste after a maximum period of 6 years has elapsed.

All Team photographs will be deleted from devices under our control within 12 month of the swimming event. Presentation evening photographs will be deleted within 3 years of the event. There are statutory timescales on how long we should keep some of your information, such as Gift Aid Claims, and we will ensure that we will abide by these regulations. We shall delete your information according to statutory limits, or according to guidance issued by the Information Commissioner or as outlined in specific event/data collection privacy policy statements.

We will maintain appropriate systems to ensure the aforementioned timescales are complied with.

### **Your rights**

The General Data Protection Regulations gives you certain rights and these are listed below for your convenience, further clarification of your rights is available on the Information Commissioners website <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

- You have a right to be informed when your personal data is being collected, what is collected and how it will be used or shared.
- You have a right of access to your personal data: the right of access allows you to be aware of and verify the lawfulness of the processing of your personal data. You can also request a copy of the information which we hold on you.
- You have a right in certain circumstances to have inaccurate personal data rectified, blocked (restrict processing), erased (right to be forgotten), or destroyed.
- You have a right in certain circumstances to data portability.

In certain situations, these rights may not apply, for example if you are a CIO member we will need to communicate with you about your membership or if you hold a CIO office and we need to communicate with you in relation to that office, in which case you will not be able to unsubscribe from these communications whilst holding that office.

We collect and process your personal data through legitimate interests or because you have provided it to us to enable us to deliver a service to you. We will only process your personal data as you would reasonably expect us to. You can opt out of our mailings at any time.

Finally, if you are unhappy with how we have processed your information, you have the right to lodge a complaint with the Office of the Information Commissioner, contact details below.

### **Changes to this privacy notice**

We may change this Privacy Policy Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear by notifying you directly.

### **Our contact details**

Secretary: Colin Stones

Tel: 01724 348529

Email: colinpstones@ntlworld.com

**Information Commissioner's Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire, SK9 5AF

Helpline: 0303 123 1113 (local rate) or ++44 1625 545 745

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*North Lincs Rotary Charitable Incorporated Organisation  
This document was created 8 February 2024*