

# Glasgow Life Specific Privacy Notice for: Pool Lifeguard Qualification Course



#### Controller - who we are:

Glasgow Life, the operating name of Culture and Sport Glasgow, is the controller of personal information collected by us that is necessary for our processing purposes. See **contact us** for details of our data protection officer.



## Specific purposes why do we need your personal information and what do we do with it?

You are giving us your personal information to allow us to administer and provide you training and assessments towards the attainment of a recognised Pool Lifeguard qualification. Any health-related information will only be used to the minimum extent necessary to assess your fitness and suitability for the course.

You can choose to provide the optional health-related equalities information. We use this information to help ensure equitable participation in the services we provide in line with the Equality Act 2010 and to make any reasonable adjustments you may request of us if you consider yourself as having a disability.

We also use your information to verify your identity where required, contact you by post, email or phone and to maintain our records, including details of when you contact us and when we contact you. This would include providing you with any essential information relating to the service we provide to you, dealing with any general enquiries or requests you make, and responding to any complaints or claims relating to you that may arise as a result of you using our services.

We will not sell or rent your information to third parties. We will not use your personal data for marketing purposes – unless you have specifically consented to receive marketing information from us.

When data is used for research or statistical monitoring purposes, the information is anonymised and aggregated so that no identifiable data will be disclosed. Any exception to this safeguard would require your prior consent before information identifying you can be disclosed.



## Specific sharing who do we share your information with?

We are legally obliged to safeguard public funds, so we are required to verify and check your details internally for fraud prevention. We may share this information with other public bodies (and receive information from these other bodies) for fraud checking purposes.

We are also legally obliged to share certain data with other public bodies, such as HMRC and will do so where the law requires this. We will also generally comply with requests for specific information from other regulatory and law enforcement bodies where this is necessary and appropriate. Your information is also analysed internally to help us improve our services.

This data sharing is in accordance with our Information Use and Privacy Policy and covered in our full privacy statement on our website.

To provide the service to you, we need to use other organisations to provide the systems we use and the service we provide. We ensure legal safeguards and written agreements are in place for these other organisations in meeting data protection law requirements.





# Specific legal basis for using your information:

We provide this service to you under the **legal basis** that is **necessary for the performance of a contract** (or taking steps to enter into a contract with you). If you do not provide us with the information we have asked for, then we will not be able to provide this service to you.

We also rely on other lawful bases for other uses of your personal data which are **necessary for the performance of a task carried out in the public interest by Glasgow Life** (e.g. complaints handling) and **necessary for compliance with a legal obligation to which Glasgow Life is subject** (e.g. legal rights and health equalities and health and safety purposes).

We process the more sensitive (health-related) information about you as set out in the Data Protection Act 2018 under additional conditions that are required if it is necessary to carry out key functions as outlined by law. This can include to establish, exercise or defend our rights for any potential **legal claims** or is necessary for reasons of **substantial public interest** including meeting **statutory purposes or other public interest grounds** (e.g. **health and safety** or **ensuring equality of opportunity and treatment** when making 'reasonable adjustments' for you that you may request of us if you consider yourself has having a disability). We will also use this information for **archiving**, **research and statistical purposes**.

We may also need to process your data when it is **necessary to protect the vital interests of you or another person** (e.g. in an emergency where in the circumstances it is not feasible to obtain consent).



### Your rights under data protection law:

- access to your information you have the right to request a copy of the personal information that we hold about you.
- **correcting your information** we want to make sure that your personal information is accurate, complete and up to date. Therefore you may ask us to correct any personal information about you that you believe does not meet these standards.
- **Deletion of your information** you have the right to ask us to delete personal information about you where:
  - I. you think that we no longer need to hold the information for the purposes for which it was originally obtained
  - I. you have a genuine objection to our use of your personal information see *Objecting to how* we may use your information below
  - II. our use of your personal information is contrary to law or our other legal obligations.

**Objecting to how we may use your information** – You have the right at any time to tell us to stop using your personal information for direct marketing purposes.

Restricting how we may use your information – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information that we hold about you or we are assessing the objection you have made to our use of your information. This right might also apply if we no longer have a basis for using your personal information but you don't want us to delete the data. Where this right is realistically applied will mean that we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

You can see a summary of how **your rights** are implemented for each **legal basis** used at: <a href="https://www.glasgowlife.org.uk/privacy-rights">www.glasgowlife.org.uk/privacy-rights</a>. Please see **contact us** for details of our data protection officer if you wish to exercise any of these rights.





### Information you have given us about other people:

If you have provided anyone else's details on this form (emergency contact), please make sure that you have told them that you have given their information to Glasgow Life. We will only use this information to contact them in the event of an emergency.

If they want any more information on how we will use their information they can visit our web site at <a href="https://www.glasgowlife.org.uk/privacy">www.glasgowlife.org.uk/privacy</a> or email dataprotection@glasgow.gov.uk.



### More information:

Details of retention periods for different aspects of your personal information are available in our Records Retention Schedule which is available from <a href="www.glasgowlife.org.uk/rrs">www.glasgowlife.org.uk/rrs</a>. The standard retention period for your personal information to be held securely and for auditing purposes will be 6 years after the end of this course. You can find more details about how we handle your personal information at: <a href="www.glasgowlife.org.uk/privacy">www.glasgowlife.org.uk/privacy</a>. If you need help in another format e.g. large print, braille or audio, please ask a member of staff, contact us or visit: <a href="www.glasgowlife.org.uk/accessibility">www.glasgowlife.org.uk/accessibility</a>



### We aim to directly resolve all complaints:

If your complaint is not about a data protection matter you can find details on how to make a complaint on our website at: <a href="www.glasgowlife.org.uk/contact-us/leave-a-comment.">www.glasgowlife.org.uk/contact-us/leave-a-comment.</a>

If your complaint is about how we have handled your personal information, you can contact our Data Protection Officer - see contact us below.

However, you also have the right to lodge a complaint about data protection matters with the Information Commissioner's Office, who can be contacted by post at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. By phone on 0303 123 1113 (local rate) or 01625 545 745. Visit their website for more information at: https://ico.org.uk/concerns



#### **Contact us:**

You can contact our data protection officer about any data protection matter by post at this address: c/o Data Protection, GCC, City Chambers, George Square, Glasgow G2 1DU, United Kingdom; by email at: dataprotection@glasgow.gov.uk; and by telephone on: 0141 287 1055.

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