Personal Data Privacy Notice — Festivalul Natației 2027

1. Who is responsible for the data

The controller for registration, organisation and documentation of Festivalul Natației 2027 is Asociația Club Sportiv YES Swimming, tax identification number (CUI) 53174059, registered office at Str. Măriuca nr. 45C, Sector 4, Bucharest, represented by Andrei Cozariuc, President. Website: festivalulnatatiei.ro. For registration and personal data rights, contact contact@yesswimming.ro and contact@festivalulnatatiei.ro.

2. Responsibilities and access

CS YES Swimming administers the registration form and register, checks sporting eligibility and payments, confirms places, communicates with applicants and prepares sporting lists and results. Staff access is limited to their duties. Logistics lists may include the athlete's name, year of birth, sex, A/SP category, school / sports club, edition, session, events and awards information. Applicant contact details are used for specific organisational and communication tasks. Financial, medical and technical data are excluded from public lists and general logistics exports. CS YES Swimming manages notices at collection, individuals' requests, providers and security incidents.

3. What data we use, where they come from and who manages them

Fields marked as mandatory in the form are necessary for registration, eligibility checks, communication and payment records. Without these data, registration or participation cannot be confirmed. The form requests only necessary data. Photo and video consent is described in Section 8 and is optional. Newsletter subscription consent is also optional.

Medical data obtained after submission of the registration form are addressed separately in Section 5 of this notice.

The data fall into the following categories:

Registration data: the athlete's first and last name, date and year of birth, sex, A/SP status, school / sports club.

Applicant data: capacity as parent/legal representative or adult athlete, first and last name, email and telephone number. For a minor, the application and choices are submitted by the legal representative in accordance with their rights. Adult athletes provide their own contact details and express choices on their own behalf. A change in status during registration requires the representation details to be updated without rewriting the document history.

Administrative data: application number, submission date, reservation status, payment verification, documents and versions reviewed, choices expressed and their timestamps, operational messages and the administrative intervention log.

Financial data: payment amount, date and reference, payer's name and, where necessary for identification or reimbursement, bank account details. Fees are paid only by bank transfer, and the bank processes payments under its own obligations. Card details are not requested on the website.

Sporting data: events, heats, relay team composition, times, penalties, placings, points and awards.

Technical data: session identifiers, security events and IP address or its cryptographic fingerprint, within the actual functions of the hosting service and protection against abuse.

Consent data for subsequent communications: registration applicant's name and email address (optional).

Messages concerning the application, payment, approval, schedule and safety are operational and are not optional.

Data come mainly from the form, correspondence and payment. To verify A/SP status, we may use club confirmation and legally available FRNPM records. Sporting data are generated by the competition. If we receive data from someone else, we provide the applicable information, including the source, under Article 14 GDPR. We do not routinely request a Romanian personal identification number (CNP), copies of identity documents, the athlete's address, medical test results or diagnoses.

No admission decisions with legal effects are made solely by automated means, and no profiling is carried out. Form validation, duplicate prevention and the counter are technical tools; reservations, A/SP corrections and medical checks are controlled by authorised personnel.

4. Purposes and legal bases for ordinary personal data

Managing applications and participation, communicating the schedule and keeping payment records are necessary for pre-contractual steps and performance of the participation terms under Article 6(1)(b) GDPR, insofar as the data subject is a party to that relationship. For a represented minor, the representation relationship and applicable legal basis are verified in the controller's records, without assuming that a contract with the parent automatically covers every use of the child's data.

Organising heats, accreditation, duplicate prevention, ensuring correct categories and protecting the platform rely, to the extent necessary, on the legitimate interest in a fair and safe competition under Article 6(1)(f) GDPR. This interest is assessed taking account of children's vulnerability, data minimisation, restricted access and the right to object. It does not extend to marketing or health data.

Financial and accounting records and responses to mandatory requests from authorities rely on applicable legal obligations under Article 6(1)(c) GDPR. Evidence of consent and the defence of rights may rely on legitimate interests, with restricted access and retention. Promotional image use and updates about future activities rely on separate consent under Article 6(1)(a) GDPR. The basis for CS YES Swimming's management of data is communicating information about this event and future events.

5. Medical documents follow a separate process

Upload clearance only through the secure "Medical documents" module on festivalulnatatiei.ro, as JPG, PNG or PDF, no more than 5 MB, 5–10 days before the selected edition. Do not email the document as an attachment. The complete registration code identifies the application; access is verified by a temporary code sent to its registered email address. Reminders and notifications are operational and independent of promotional consent. Clearance is checked exclusively by CS YES Swimming President Cozariuc Andrei. Registration approval reserves a place and includes it in the counter before clearance is uploaded; actual participation also requires the medical document to be validated.

For checking the medical participation requirement, the general basis is Article 6(1)(c) GDPR in conjunction with Articles 54–55 of Romanian Law 69/2000. Health-data processing additionally requires separate explicit consent under Article 9(2)(a) GDPR. Consent to clearance inspection and a minimal verification record is separate from consent to uploading and storing a copy. Refusing copy storage allows the applicant to request inspection without retaining a copy, arranged with President Cozariuc Andrei before the edition deadline. That inspection and its record also involve health data and are covered by the specific notice and consent. Registration approval and inclusion in the counter do not depend on copy-storage consent. Actual participation cannot be validated without a valid clearance check. Consent may be withdrawn at contact@yesswimming.ro or contact@festivalulnatatiei.ro without affecting prior lawful processing. Withdrawing storage consent leads to deletion of the copy and discussion of no-copy inspection; it does not automatically cancel the approved place. No automated medical decisions are made.

Diagnoses, test results, ECGs and full medical records are not requested. The file is encrypted outside the public directory and accessible only through President Cozariuc Andrei's personal owner account. Access is logged. Documents are not published, included in CSV exports or attached to notification emails.

6. Who may receive the data

Within their duties, ordinary personal data may be accessed by authorised CS YES Swimming personnel, officials and accreditation, timing and awards staff. Accounting staff receive only necessary financial data. Hosting, technical maintenance and email providers may process data as processors under contracts and their actual tasks. Authorities and courts may receive data under the law. We do not share the entire register with sponsors or partners, and we do not sell data. A new recipient category or an incompatible purpose requires assessment and information before disclosure.

7. Public results

Published sporting lists and results necessary for the competition will contain the athlete's name, year of birth, sex, A/SP status, club, event, time, placing, points and award. Full dates of birth, school details unless necessary, parent contact details, payments, consents and medical information are not published.

The purpose is transparent rankings and information for participants, based on a documented legitimate interest, with additional safeguards for children. Before publication, consideration is given to whether some lists may be accessible only to participants. A reasoned objection may be submitted; the controller assesses the circumstances and the possibility of

anonymisation or restricted visibility. Publication of all data is not presented as mandatory merely because someone registers.

8. Photos, videos and promotional communications

Photography is provided by CS YES Swimming, which makes photographs available to the organisers and applicants/participants in Festivalul Natației 2027 under the terms of this notice.

Photo and video consent is optional for applicants and separate from acceptance of the competition terms. It covers photographs or recordings in which the athlete is identifiable. Consent may be withdrawn at any time. Photographs or recordings may be used for promotion by CS YES Swimming on the competition website, their own websites, email communications and official Facebook and Instagram pages to present the current and future editions.

It does not cover paid advertising, transfer to sponsors, facial recognition or independent commercial reuse.

Refusal or withdrawal of this consent does not affect eligibility, the fee or access to awards. Withdrawal stops future uses under the controller's control; identifiable online material is removed where applicable and possible, without guaranteeing deletion of copies independently made by third parties. Promotional publication may take place on festivalulnatatiei.ro and official YES Swimming Facebook and Instagram pages only where the appropriate consent exists. Meta platforms process data under their own policies and may involve transfers outside the EEA under applicable safeguards. Applicants may refuse publication on these channels and request withdrawal using the contact addresses.

9. Retention periods

Medical documents and fit/unfit statuses are retained for no more than 30 calendar days after the relevant edition: until 29 June 2027 for Edition VII, 13 July 2027 for Edition VIII, 12 October 2027 for Edition IX and 19 October 2027 for Edition X. If verification or the request is abandoned, data are not retained longer than necessary. Files and health statuses are automatically removed from active storage. Copies downloaded by the president are deleted within the same period; replaced documents are deleted upon replacement.

Unaccepted and unpaid applications: 90 days after the edition or resolution of the request. Administrative participation records and evidence of accepted terms, excluding medical documents: three years from the edition or settlement of the relationship, limited to proving registration and defending rights. Working logistics lists and identifiable public results: three years, followed by deletion, removal from public display or anonymisation; a longer archive identifying individuals requires separate assessment and notice.

Promotional photographs and videos: two years after the edition or until consent is withdrawn, whichever is earlier. Ordinary technical logs: no more than 90 days; evidence of a specific incident may be isolated for investigation. Financial and accounting records are retained for the applicable statutory period. Litigation or a legal obligation may justify retaining only necessary data with restricted access and a documented period. Backups are overwritten according to the provider's actual cycle; established deletions and restrictions are reapplied after restoration. Instant deletion of copies outside our control is not promised.

10. Security and transfers

Access is granted individually according to duties, with confidentiality, authentication and secure connections; shared partner accounts are not used for medical data. Exports are not shared in public groups or through open links. CS YES Swimming establishes procedures for backups, deletion, incidents and staff training.

The website uses the technical storage described in the cookie policy for sessions, security, language choice and preferences. The code of this version integrates no analytics services, marketing pixels or embedded maps and videos. External links open the service selected by the visitor. Any subsequent integration requiring consent will be accompanied by an updated notice and a choice before loading.

11. Rights and contact

Under the GDPR, you may request access, rectification, erasure, restriction and portability where applicable, and object to processing based on legitimate interests. Consent for an optional purpose may be withdrawn as easily as it was given. Rights are not absolute and are assessed in relation to the applicable legal basis and obligations.

Requests should be sent to contact@yesswimming.ro or contact@festivalulnatatiei.ro. Health-related requests are handled exclusively by authorised CS YES Swimming personnel. Identity is verified proportionately; copies of identity documents are not automatically requested.

We generally respond within one month. If an extension permitted by the GDPR is necessary, we communicate the reason and deadline within the first month. Requests are generally free of charge, subject to statutory exceptions. You may lodge a complaint with ANSPDCP, www.dataprotection.ro, and seek protection from the courts. There is no requirement to complain to the organisers before contacting the authority.

* GDPR = Regulation (EU) 2016/679, https://eur-lex.europa.eu/eli/reg/2016/679/oj; Law 69/2000.

Information about future YES Swimming competitions and activities — optional

You may choose separately:

- a) I want to receive information about upcoming competitions and activities organised by Asociația Club Sportiv YES Swimming.
- b) I do not want to receive information about upcoming competitions and activities organised by Asociația Club Sportiv YES Swimming.

By choosing “I want to receive information”, you consent to Asociația Club Sportiv YES Swimming using the applicant’s name and email address to send email information about its upcoming competitions and activities. This choice concerns the registration applicant: the parent/legal representative or adult athlete. Neither option is preselected. Refusal does not affect registration, participation, the fee or awards, and does not stop operational communications about the competition for which you are registering.

You may withdraw consent at any time, free of charge, by emailing contact@yesswimming.ro or contact@festivalulnatatiei.ro; this option is stated in each message. Withdrawal does not affect the lawfulness of earlier processing. The sole controller for this purpose is Asociația Club Sportiv YES Swimming. The legal basis is consent under Article 6(1)(a) GDPR. Data are used for this purpose until consent is withdrawn. Evidence of the choice, notice version and timestamp is kept separately in the consent records, subject to the applicable retention periods in this notice. Choosing “I do not want to receive information” is recorded and does not permit these promotional messages to be sent.

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