

Privacy Policy

Why you should read this policy

We ask that you read this Privacy Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are?

<http://swimwise.co.uk> (**Website**) is operated by Swimwise Swimming School Limited. We are a business dedicated to provide swimming lessons for all ages and abilities and which is incorporated and registered in England and Wales under company number 13811657 whose registered office address is at Kemp House, 160 City Road London, EC1V 2NX, UNITED KINGDOM.

We take the privacy of our customer and Website visitors very seriously. We ask that you read this privacy policy (Policy) carefully as it contains important information about how we will use your personal data.

Swimwise Swimming School Limited (**'We' or 'us'**) collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and the Data Protection Act 2018. We are responsible as 'controller' of that personal information for the purposes of those laws.

Our collection and use of your personal information

Information that you provide

We collect personal information about you when you submit data onto our website, register for a swimming lesson, share information via the Website's social media functions, complete forms or report a problem with the Website.

We will also obtain personal information you provide when you send us feedback, post material, contact us for any reason and by any medium, make a payment for a lesson through our website and share information via the website's social media functions.

We collect this personal information from you either directly, such as when you contact us or indirectly, such as your browsing activity while on our Website (see cookies on our website).

We may ask you to provide sensitive personal data from time to time, which may include data relating to health conditions. If such data is requested, you will be given additional information as to why the sensitive personal data is being requested and how it will be used, often this will be required to provide you with our services.

The personal information we collect about you depends on the particular activities carried out and the reason for the processing. Such information includes, but is not limited to:

- your name, address and contact details;
- special category data such as health information;
- details of any feedback you give us by phone, email, post or via social media; and
- information about the services we provide to you.

Personal information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her data;
- receive on his/her behalf any data protection notices;
- give consent to any transfer of his/her data.

Information from third parties

Occasionally we may receive information about you from other sources, which will be added to the information already held about you in order for us to help supply our services and products to you.

How your personal data will be used

We use this personal information to:

- create and manage your account, and that of any pupil, with us;
- verify your identity;
- register and book attendance for any swimming lessons;
- administration;
- fraud prevention and detection;
- notify you of any changes to our website or to our services that may affect you;
- improve our services.

Our legal basis for processing your personal information

When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

- **consent:** where you have given us clear consent for us to process your personal information for a specific purpose;
- **contract:** where our use of your personal information is necessary for providing the swimming lessons;
- **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests).

Disclosure of your personal data

We may disclose your personal data to:

- other companies that are part of a group with Swimwise Swimming School Limited;

- a third party who acquires Swimwise Swimming School Limited or acquires substantially all of its assets, in which case the personal data shall be one of the acquired assets;
- our employees, for the purpose of providing services;
- law enforcement and regulatory agencies in connection with any investigation to help prevent unlawful activity or as otherwise required by applicable law.

Our website does not collect or compile personally identifying information for dissemination or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

Transfer of your information out of the EEA

All information you provide to us is stored with secure data processors for the purposes of storing your data, accounting purposes and social media purposes for example. A copy of your information is also stored securely on our internal server and computers where access is restricted.

There may be occasions where data may be transferred outside of the EU for storage or processing (e.g. bulk email providers). Where necessary, we will take steps to ensure that there are adequate safeguards in place to protect your personal data.

For example, for servers located in the US, we would look for compliance with the EU-US Privacy Shield Framework, which offers compliance with EU data protection requirements when transferring personal data from the European Union to the United States. You can find more information about Privacy Shield at <https://www.privacyshield.gov/welcome>. You can also check specific companies' certification at https://www.privacyshield.gov/participant_search.

Marketing

If you have provided your consent to receive news, special offers or promotions from us, or if it is within our legitimate interest to do so, we may contact you by mail, telephone and email, about our products, services, promotions, special offers and charitable causes that may be of interest to you.

The website may contain links to other websites or apps which we or our partners own, or websites or apps of our partners or third parties. Please note that if you follow any of these links, the websites, apps and services provided through them will have their own privacy policies/terms of use. We do not accept any responsibility or liability for their respective privacy policies/terms of use or the collection and use of any personal data collected through these websites,

apps or services. Please ensure that you review the relevant privacy policies/terms of use prior to providing any personal data to, or using these websites, apps and services.

Monitoring

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

Your Rights

We will collect and store information about you, as detailed above. Under the General Data Protection Regulations (GDPR), you have the following rights:

- You have the **right to be informed** about the collection and use of your personal data.
- You have the **right of access** to your personal records or other information that we hold about you. We reserve the right to charge a reasonable fee for our administrative costs involved with providing you with access if we receive a request which is manifestly unfounded or excessive to access personal records. We may also charge a reasonable fee, in relation to administrative costs, if further copies of your data is requested following your initial request.
- You have the **right to rectify any errors** in the data we hold about you. If any data or information we hold about you is inaccurate, or out of date, please contact us and we will correct this immediately.
- You may have the **right to have the data we hold about you erased**.
- You have the **right to restrict processing**.
- You have the right to ask us to **stop processing your personal data for direct marketing purposes**. You may also specify that you object to direct marketing by particular channels such as by email or telephone. If this is the case, please specify the channels you are objecting to in your communications with us.
- You have the **right to data portability**. If you wish to obtain your data for your own purposes across different services, we will provide this information to you in an electronic format such as a PDF file, CSV file or via other electronic means. We reserve the right to charge a reasonable fee for the administrative costs of complying with any requests that are manifestly unfounded or excessive.
- You have the **right not to be subject to automated decision-making, including profiling**.

To revise your consent, access, amend or remove your records or assert any of your rights set out above, you should send your request in writing to us at [INSERT EMAIL ADDRESS].

You may need to provide proof of identity and address (eg a copy of your driving licence or passport, and a recent utility or credit card bill); and specify the personal data you want access to, amended or removed.

How long we will store your data

We will store your data for as long as necessary for the purpose of processing. The data may be deleted in the following circumstances:

- you have withdrawn your consent to data processing;
- the original purpose for processing the data is no longer relevant or cannot be performed anymore;
- the data is no longer up to date or accurate; or
- where we no longer have a reason to store your data as determined by our Data Retention Policy.

Children

Due to the nature of our business, our customers may be children or parents on behalf of their children. In using our services, you confirm that you have read and consented to this Policy on behalf of any individual under the age of 18.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also confirm that your data will be stored on secure servers.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Changes to this Privacy Policy

We may change this Policy from time to time. You should check this policy frequently to ensure you are aware of the most recent version that will apply each time you use the website.

How to contact us

Please contact us if you have any questions about this privacy notice or the information, we hold about you.

If you wish to contact us, please send an email to info@swimwise.co.uk.

Concerns and Questions

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.