

General Data Protection Regulation Policy



Aim and Purpose of this Policy:

At Let's Swim We are committed to the protection of your data.

This policy outlines information regarding the collection and processing of personal data provided to Let's Swim. Please read the following information carefully.

The General Data Protection Regulation 2018 (GDPR) is an enhanced legal framework which sets the guidelines for the collection, and processing of personal information. The implementation of GDPR is a legal requirement and thus breaching the guidelines given is a criminal offence.

The six principles of the GDPR are as follows:

1. Collection of data must be made through a lawful, fair and transparent process.
2. Personal Data must be collected only for specific and legitimate purposes.
3. Data requirements must be adequate, relevant and limited to only what is necessary.
4. All Personal Data must be accurate and kept up to date.
5. Data must only be stored for as long as is necessary.
6. Appropriate measures which ensure security, integrity and confidentiality of Personal Data must be in place.

1. Data Collection:

How does Let's Swim collect my personal data?

Personal data is required by Let's Swim to provide a safe, effective service with good communication. We collect this data from you via a variety of methods including: telephone voice call / voicemail / text message, email and registration form.

Upon enrollment all participants are required to submit their data in writing or by electronic submission by completing a statutory Registration Form. Enrollment forms request the following information: participant and next of kin details, contact details, medical details and details regarding special educational requirements and disabilities.

2. Legitimacy:

Why does Let's Swim need my personal data?

Let's Swim have a legal obligation to only collect data to be used for specific and legitimate purposes. These purposes include administrative and communication purposes, health and safety purposes, insurance purposes, marketing and advertising purposes. Please see the table in clause 3 which outlines clearly the data which we collect from you, the purpose behind us having this data and the legality of Let's Swim having access to this data.

3. Let's Swim Data requirements

What will Let's Swim use my personal data for?

The table in this section outlines which types of data Let's Swim may collect along with the purpose and legal basis behind us having this information.

Purpose:	Data:	Legal Basis
Administrative Data: for use when managing bookings/enquiries, updates, payments, events, products and services.	contact details, including contact name, telephone number, postal address and email address	It is necessary for us to have access to the listed details in order for us to communicate and provide an effective service to both new and existing clients.
Health & Safety Data: To comply with health and safety requirements and ensure that suitable measures and adjustments are in place where necessary.	participant medical information, information regarding educational needs and disabilities	We have a legal obligation to ensure that our working environment is safe for all participants including those who however so may have additional needs.
Attendance Data: for health and safety purposes and to ensure that we keep an attendance register, in case of incident or emergency, but also to aid administrative purposes.	participants first name, record of attendance marked as present, absent or late	We have a legal obligation to keep record of attendance. Especially for the purpose of unforeseen incident or emergency for example in evacuation procedure.
Retention of Data: for the purpose of insurance based incidents, claim or complaint	data collected on Registration Form.	Unless a specific request for future contact, enrollment information is retained for a maximum of 12

		months after a termination of service.
Marketing and Advertising: to promote our services to the wider public or to existing clients either through social media, website, local leafleting and advertising.	images in video/ photographic form	Strictly where permissions have been granted through our enrollment form. Please note that photographic and video content are never paired with names of participants in order to protect their identity.
Return of payment: Processing of refunds for whichever reason.	Recipient full name and address	In order to settle outstanding funds owed to the clientel by the business due to refund or termination of enrollment.

4. Accuracy and Data Updates:

How can I be sure that my personal data is up to date and correct?

Data is collected first hand as part of Let's Swim enrollment process. This data can be updated by members by simply requesting and completing a registration form, as part of our update procedures we may request data updates at least once a year and may do so more frequently if deemed necessary.

5. Retention of Data

How long does Let's Swim keep my personal data for?

All data is kept for the duration of a membership and is managed securely and confidentially. All documentation of former members is destroyed appropriately within 12 months of termination of membership.

6. Data Integrity, Security and Confidentiality

What measures are in place to ensure that my personal data is kept securely and confidentially?

Where necessary Let's Swim have put in place the appropriate technical controls to protect all personal data this includes encryption, password protection and firewalls.

Does Let's Swim share my personal data with anyone else?

In order to comply with legal requirements and our duty of care we may need to share information with professional bodies such as Swimline, Social Services or the Metropolitan Police. However we will never sell your personal information to third parties and we will not release your personal information to any companies outside of Let's Swim for any reason without first asking for your permissions separately.

Let's Swim may occasionally use a third party platforms which are carefully selected to suit our needs appropriately. These platforms help us to boost and improve our communications to members such as sending updates and promotions. These third parties will follow their own Privacy Policy and GDPR guidelines. If contacting us through a third party platform you must agree to their own policies and terms and conditions.

Further information:

For guidelines on your rights over your personal data visit www.ico.org.uk. You have the right to ask us to correct any errors, the right to request a copy of the personal data we hold about you, and the right to withdraw your personal data should its retention be deemed no longer necessary for the purpose which it was originally coll

ected. To enquire about exercising any of these rights please contact us. Before implementing any request we may need to verify your identity.

The information provided within these terms and conditions is correct from the date of publishing. Let's Swim reserve the right to review and update the above information to ensure that they are true and accurate therefore these terms and conditions are subject to change. Please refer back to these terms and conditions from time to time to refresh your understanding and to update yourself of any changes which may have been made.