

## Privacy Policy

The following statement explains how Dolphin Swimming School handles the personal data you provide to us about you and your child either to attend the school or hear about our news & events.

Our aim is to respect your privacy and comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

### The Data Controller

Dolphin Swimming School is the Data Controller for any personal data you give to us. We are contactable on;

Phone: 01727 824 683

E-mail: [info@dolphinswimschool.co.uk](mailto:info@dolphinswimschool.co.uk)

### What Personal Data We Collect and What We Do With It

We mainly ask for your personal data to book you and/or your child on to one of our swimming courses. We may collect information that is deemed 'special', especially if it related to a medical condition that could affect you or your child's ability to swim safely. We only ask for this information in order to meet our Health and Safety obligations. We will not ask for information that we do not need or will never use. We will not share this data and we will do what we can to protect it.

### Attendance at Lessons

When you sign up to attend a swimming lesson we will use the information you provide to:

- Administer you and your child's attendance at the lesson
- Process any fees due for attendance at the lesson
- Contact you with details about the lesson, times, venue, items of clothing to bring with you etc
- To ensure any additional support that may be required to support any medical needs highlighted are met

### Making you aware of our lessons and relevant information

When you book a lesson with or if you just want to subscribe to our newsletter we will:

- Use your name and email address to send you our newsletter and other relevant materials to the Swimming School
- This information will be stored in the Mailchimp system which stored information in the United States under the Privacy Shield framework.
- Not be shared with others or sold to others
- Deleted when you say that you do not want to receive this information any more

WHAT WE DO	OUR LEGAL BASIS UNDER GDPR
Attendance and delivery of swimming lessons for you and/or your child	Article 6(1)(a) – you provide your personal data to us with consent. If you do not want us to process your data you have the choice to not use our service Article 9(2)(b) – we only require information about any medical needs in order to meet

WHAT WE DO	OUR LEGAL BASIS UNDER GDPR
	our Health & Safety legal obligations. We do not ask or use this information for any other purpose.
Delivery of our services to you including the tools used to manage those services.	Article 6(1)(f) – this is necessary for our legitimate interests. Any sensitive information is not stored on any electronic applications.
Administration of payments & our book keeping obligations	Article 6(1)(c) – We keep your name and payment type for a minimum of 6 years from the date you made a payment in order to meet our tax obligations.  Article 6(1)(f) – We process your payment details under our own legitimate interests to ensure course attendance is paid for where applicable.
Contact you with regard to any matter arising from your booking or attendance at our event.	Article 6(1)(f) – this is necessary for our legitimate interests.
Keep you informed of news, and forthcoming events	Article 6(1)(a) – we will process your basic contact information in order to send emails to you.

We do not disclose your data to any other parties without your written consent.

Where you require us to make reasonable adjustments to enable you or your child to attend an event or a lesson, we may require further information from you. If this includes information about your or your child's physical or mental health, such information (being sensitive personal data (Special Categories Data)), will only be used by us where necessary in order to meet our obligations under the Health & Safety Act. We will not share or disclose it to others. The legal basis upon which we do this is set out in Article 9(2)(b) of GDPR. Please note, not providing this information where it is relevant may result in us not being able to make reasonable adjustments in time and we may refuse to admit you or your child into the lesson if it is unsafe.

### News & updates

When subscribing to hear about our news and updates we will ask for information about you as the parent. This is used to send you our newsletter, occasional updates on important issues that may affect you, your child or your lessons and to keep you informed of forthcoming lessons run by the School.

You can unsubscribe at any time. Please send an email to [info@dolphinwimschool.co.uk](mailto:info@dolphinwimschool.co.uk) or click unsubscribe from any of the newsletters we send to you.

### How Long We Keep Your Personal Data

We will keep information about you and your child

By law we have to keep basic information about customers and their contact details for a minimum of 6 years for tax purposes.

Where you are a regular attendee at our lessons we will keep your personal data for longer where we feel it will speed up the booking process and to save you having to give us the information again.

Subject to any legal requirement, we will delete your information where you tell us that you will no

longer be attending our courses in the future or six years after you last attended a course.

For the purposes of receiving our news and updates we will keep your information until you unsubscribe.

### **Third Parties**

In order to provide you with a good service, e.g. if you have special needs or meal requirements, we may pass on your basic details to the swimming venue but only where it is necessary in order to ensure the safety and wellbeing of you or your child during our lessons.

Dolphin Swimming School will not sell, assign, disclose or rent your personal data to any other external organisation or individual.

### **Protecting Your Personal Data**

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place appropriate technical, physical and managerial procedures to safeguard and secure the information we collect from you.

### **Cookies**

Cookies are used on this website. A cookie is a text file that sits on your device designed to tailor website content for you or help a website's functionality work. Cookies make it easier for you to log on to and use the site during future visits. They also allow us to monitor website traffic and to personalise the content of the site for you. Our system will issue cookies to your computer when you log on to the site. However, you can set your web browser to refuse cookies. Some of the services we use such as Google Analytics, set cookies to allow us to gather anonymous data about your usage of our website. Browsers usually will allow you to refuse cookies but this could have a negative impact on the usability of many websites.

### **Links to Other Sites**

Our web site contains links to other web sites. We are not responsible for the privacy practices of such other sites. When you leave our site please be sure to read the privacy statements of each and every web site that collects personal data about you. This privacy policy applies solely to information collected by the Dolphin Swimming School.

### **Your Data Abroad**

We currently use the Mailchimp email system which hosts data outside of the United Kingdom in the United States. This information is covered by the Privacy Shield framework. If and when you are removed from our mailing list your information is removed from this system. For more information about Mailchimp please visit [www.mailchimp.com/legal/privacy](http://www.mailchimp.com/legal/privacy).

### **Your Rights**

You have control over the information you provide to us. You can object or withdraw your consent to the use of your personal data at any time. Though in some cases we may not be able to provide your requested service (e.g. membership or course) where the information processing is an integral part of the service. We will tell you if this is likely to be the case.

Subject to some legal exceptions, you have the right to:

- request a copy of the personal information Dolphin Swimming School holds about you;
- to have any inaccuracies corrected;
- to have your personal data erased;
- to place a restriction on our processing of your data;
- to object to processing; and
- to request your data to be ported (data portability).

To learn more about these rights please see the [ICO website](#).

Please address any such requests to the manager via [info@dolpinswimschool.co.uk](mailto:info@dolpinswimschool.co.uk).

If you are concerned about the way we handle your data please contact us. However, you can also complain to the [Information Commissioner's Office](#)

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

**Telephone:** 0303 123 1113 (local rate) or 01625 545 745

**Fax:** 01625 524 510

**Last update: May 2018**

If you have any concerns or queries about this privacy policy please contact [info@dolpinswimschool.co.uk](mailto:info@dolpinswimschool.co.uk).