



Paddles Swim School

General Data Protection Regulation (GDPR):

Institute of Swimming, and British Swimming. This information may be shared with us.

If you are providing us with details of next of kin, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the "Your rights in relation to personal information" section below.

How and why your information is used:

- The information below describes the main purposes for which we process your personal information, the categories of your information involved and the lawful basis for being able to do this.
- Data protection law requires us to rely on one or more lawful grounds to process your personal information.

We consider the following grounds to be relevant:

- Specific consent - where you have provided specific consent to us using your personal information in a certain way, such as to send you email or texts.
- Legitimate Interest - to send information on activities and events which have been arranged as part of membership.
- Performance of a contract - to allow us to provide member services associated with the day to day running of the club and its activities such as requests for payments, registers, and fees.
- Legal obligation - to fulfil legal obligations for health and safety, insurance and child protection purposes.



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Direct marketing

We may need to contact you by email, post or SMS with information about our products and services we believe you may be interested in. We will only send marketing messages to you in accordance with the marketing preferences you set. You can let us know at any time that you do not wish to receive marketing message by contacting us.

Disclosure of your personal information

Personal information may be shared with the following:

Any party approved by you;

To the governing body (Swim England) or regional body or county affiliation to allow them to properly administer the sport on a local, regional and national level;

Other service providers and advisors: for example, email marketing specialists, payment processes, professional advisors, data analysis and IT services (including CRM, website, video and teleconference services);

External funding providers;

Our Partners and Activity Providers;

The Government or our Regulators: where we are required to do so by law or to assist with their investigations or initiatives

Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

In addition to this, any event which you enter into may process and hold personal data which is required in order for you to participate. This policy does not cover how your data is processed in relation to external bodies.



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Transferring your personal information internationally

Your personal information is not transferred to and stored in countries outside of the UK and the European Union.

Retention of personal information

The duration for which personal information is retained will differ depending on the type of information and the reason why it is collected from you. However, in some cases personal information may be retained on a long term basis; for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirements we retain all physical and electronic records for a period of 6 years after your last contact with us OR beyond the duration of your membership.

Exceptions to this rule are:

Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months.

Information that may be relevant to personal injury claims or discrimination claims which may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation might not start to run until a long time after the event.

We will continue to store individuals' performance data which form part of the club's competitive records.

It is important to ensure that the personal information we hold about you is accurate and up to date, and you should let us know if anything changes, for example if you change your phone number or email address.



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Your rights in relation to personal information

You have the following rights in relation to your personal information:

- The right to be informed about how your personal information is being used;
- The right to access the personal information held about you;
- The right to request the correction of inaccurate personal information held about you;
- The right to request the erasure of your personal information in certain limited circumstances;
- The right to restrict processing of your personal information where certain requirements are met;
- The right to object to the processing of your personal information;
- The right to request the transfer of elements of your data either to you or another service provider;
- The right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However some rights have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>



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To exercise any of the above rights, or if you have any questions relating to your rights, please contact us. If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

Changes to this notice

This privacy notice may be updated from time to time. When a change to this notice is made in a material way. For significant changes to this notice, reasonable notice will be given unless we are prevented from doing so.

Where required by law we will seek your consent to changes in the way we use your personal information.

