



Document: Privacy Policy

Last updated: Saturday, 24 October 2020

Terms and Conditions

Hayley's Swimming School respect your right to privacy and comply with obligations under the Data Protection Acts 1988 & 2002 and the EU General Data Protection Regulation 2018 (GDPR).

We are committed to protecting any personal data that we collect. The purpose of this Privacy Policy is to enable you to understand what personal information of yours is collected, how and when we might use or share your information, and how you can correct any inaccuracies in the information.

This Privacy Policy also explains our online information practices and the choices you can make about the way your information is collected and used. By using our services, you agree to the use, collection and disclosure of the data that we collect in accordance with this Privacy Policy.

1. Definitions

In this privacy policy "we", "us", "our", and "Hayley's Swimming School" means Hayley's Swimming School, Flat 1, 16 Church Road, West Kirby, CH48 0RW. All references to the client will be referred to as "you", "your", "customer" or "client".

2. Who we are

We are a small swimming school for children aged 3 upwards, based on the Wirral, where we've built reputations for really caring about how children progress in swimming. Our small class sizes of 3-4 children and in water teaching, means we can give every child the attention they deserve to become a confident swimmer.

Our swim school started in 2014, and we now have three main venues in the West Kirby and Woodchurch vicinity. This means we can provide swimming

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lessons in smaller pools, with room for your child to progress, to swimming 25 metre lengths at Calday Grange pool.

Our swimming lessons are adapted to each child to ensure progress to the best of their ability, while having fun. We believe that every child matters.

Data Controller

Andre Roberts of Hayley's Swimming School is the Data Controller for all the personal data that you submit.

We encourage individuals covered by this Privacy Policy to raise any concerns about our processing of personal information by contacting the data controller using the details below:

Contact Name: Andre Roberts

Company Name: Hayley's Swimming School

Address: Flat 1 16 Church Road, West Kirby, Merseyside, CH48 0RW

Email: bookings@hayleysswimmingschool.co.uk

Phone: 07480 234807

3. Types of Information Collected

We collect the following types of information:

Personal Data

This is data that identifies you or can be used to identify or contact you, which may include parent/guardian name, child's name, child's d.o.b, child's gender, relevant medical conditions, email address and telephone no. Such information is only collected from you if you voluntarily submit it to us.

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need. We record your request and our reply in order to increase the efficiency of our business.

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Non-Personal Data

Like most websites, we gather statistical and other analytical information collected on an aggregate basis of all visitors to our website. This Non-Personal Data comprises information that cannot be used to identify or contact you. Such as user IP addresses where they have been clipped or anonymised, browser and operating system types and other anonymous statistical data involving the use of our website.

Children

This website collects data on children under the age of 13.

When you book a place with us and attend a swimming lesson or training course we need to collect your child's personal information so that we can honour your booking and to enable your child to participate in the swimming lessons or outlined course.

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to book your child's place. The data we collect may include the child's name, child's d.o.b, child's gender and relevant medical conditions.

When you contact us, whether by telephone, through our website or by e-mail, you must hold parental responsibility if the child you are wanting to book swimming lessons for is under the age of 13. This enables us to gain parental consent to collect the child's personal information.

Social Media

Our website includes social media features (such as the Facebook "Like" button). Social media features and widgets may be hosted by a third party or directly on our website. Your interactions with these features are governed by the privacy policy of the company providing the feature.

When contacting us via social media, whether a public or private message, any personal information you provide through these social media platforms, such as Facebook and Twitter, are governed by the privacy policy of the company providing the platform and not Aqua Splash Swim School.

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4. Purposes for which we hold your Information

We will process any data you provide to us for the following purposes:

1. to respond to your comments, queries and support requests.
2. to provide you with details of your lesson day time and of any changes to this throughout your time with us.
3. to carry out our obligations arising from any contracts entered into between you and us.
4. to send you communications in relation to essential membership services, including but not limited to class changes, updates, latest news, up and coming events, renewals, changes in fees'.
5. to keep you informed of any changes to the services we provide you.
6. to check that use of our services is in accordance with our terms and conditions.
7. for the purposes of security, and prevention and detection of fraud.
8. We use the Non-Personal Data gathered from visitors to our website in an aggregate form to get a better understanding of where our visitors come from and to help us better design and organise our website, products and services.

Our legal basis for holding your personal data under GDPR

- We are entitled to use your data as described in point (1) as we are responding to your request and therefore you have given consent to this processing.
- We are entitled to use your data as described in points (2), (3), (4), (5) and (6) as we require to do this as part of our contractual obligations to provide our services.
- We are entitled to use your data as described in points (7) and (8) as the purposes stated are within our legitimate interests.





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5. Storage and Management of your Personal Data

Data Storage

The data that we collect in connection with our services is stored locally on our computer system. We also have a local server which securely backs up this data separate to our computer system. Hard copies of lesson registrations are also stored in locked and secure cupboards in our alarmed office.

Data collected through our website and emails is also stored on our secure web server, which is located in a UK Data Centre with 24/7 onsite security.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Cross-Border Data Transfers

When we share your personal information with our partners and service providers (see 7. Disclosure of Information to Third Parties), your personal information may be transferred to and/or made accessible from countries out of the European Economic Area. In such circumstances, we will enter into model contractual clauses as adopted by the European Commission, or rely on alternative legal bases such as the Privacy Shield, where applicable, or binding corporate rules where our partners or service providers have adopted such internal policies approved by European data protection authorities.

Personal Data Retention Schedule

By law we have to keep basic information about customers and their contact details for a minimum of 6 years for tax purposes. We only store your information for as long as is necessary for the purpose it was obtained or for any additional purpose we have explained to you. We also implement policies to regularly audit the personal data we hold to ensure we do not retain any personal data for longer than we are entitled to.

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In addition to the data we collect from you for lessons and sessions, we are required by law to collect data for NHS Test and Trace (coming into effect from 2nd July 2020). To support NHS Test and Trace, we must hold records for 21 days. This reflects the incubation period for COVID-19 (which can be up to 14 days) and an additional 7 days to allow time for testing and tracing. After 21 days, this information will be securely disposed of or deleted. When deleting or disposing of data, we will do so in a way that does not risk unintended access (for example shredding paper documents and ensuring permanent deletion of electronic files).

Records which are made and kept for other business purposes will not be disposed of after 21 days. The requirement to dispose of the data relates to a record that is created solely for the purpose of NHS Test and Trace. All collected data, however, must comply with the General Data Protection Regulation and will not be kept for longer than is necessary.

6. Security of your Personal Data

We place great importance on the security of all personally identifiable information associated with our customers. We use technical security measures to prevent the loss, misuse, alteration or unauthorized disclosure of information under our control. We use security measures including and not limited to: physical, electronic and managerial procedures to safeguard and secure the information we collect online. All sensitive information is collected through an encrypted connection on our secure server through Secure Sockets Layer (SSL) technology.

SSL Certificate

Our website utilises industry-standard Secure Sockets Layer (SSL) technology to allow for the encryption of potentially sensitive information such as your name, address and other critically sensitive information. Information passed between your computer and our website cannot be read in the event someone else intercepts it. This technology includes the following features:

- Authentication – this assures your browser that your data is being sent to the correct computer server, and that the server is secure.
- Encryption – this encodes the data, so that it cannot be read by anyone other than the secure server.

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- **Data Integrity** – this checks the data being transferred to ensure it has not been altered.

When you access a website secured by an SSL certificate, you will see https:// at the beginning of its URL. Your web browser may also show the connection as secure by displaying a “lock” icon in the address bar.

Website, Email & Server Security

We ensure best to our ability that our systems and servers are protected from hackers, viruses, intruders and other online and offline problems by utilising the latest web security features, along with real-time file scanning for malicious files, a comprehensive firewall and advanced email filters to protect our systems.

7. Disclosure of Information to Third Parties

We share personal information in the following ways:

1. **Partners and Sponsors.** Some of our services may be offered or promoted in conjunction with a partner or sponsor, or another brand. We may share your information with these parties to offer the product or service or to facilitate your use of additional amenities.
2. **Service Providers.** We may transfer (or otherwise make available) your personal information to third parties that help us provide our services or provide services on our behalf. For example, we use service providers to authorise and process online payments, to raise and issue our invoices, to host our website and provide our email services. Our service providers are given the information they need to perform their designated functions, and we do not authorise them to use or disclose personal information for their own marketing or other purposes.
3. **Sale of Business.** We reserve the right to transfer information (including your Personal Data) to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of our company provided that the third party agrees to adhere to the terms of the Privacy Policy and provided that the third party only uses your Personal Data for the purposes that you provided it to us. You will be notified in the event of any such transfer and you will be afforded an opportunity to opt-out.

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4. **Legal and Compliance Reasons.** We may access, preserve and share your information with companies, organisations, governmental entities or individuals outside of our Company if we believe, in good faith, that the law requires us to do so. This may include, but is not limited to, responding to court orders or other legal processes (such as law enforcement requests). We may also access, preserve and share your information as necessary to: (i) establish or exercise our legal rights or defend against any legal claim; (ii) investigate, prevent, or take action regarding suspected fraud or other illegal activities; (iii) prevent death or serious physical harm to any person; or (iv) investigate violations of our Terms & Conditions.

Our legal basis for disclosing your personal data under GDPR

- We are entitled to disclose your data as described in points (1), (2) and (3), as the purposes stated are all within our legitimate interests.
- We are entitled to disclose your data as described in point (4), on the basis that we are legally required to do so.

8. Use of Cookies

This website does not store any information that would, on its own, allow us to identify individual users of this service without their permission. Any cookies that may be used by this website are used either solely on a per session basis or to help improve and maintain the website. Cookies are not shared with any third parties. This website uses session cookies to count visits to each webpage and generate statistics. This information helps us improve and maintain our website. Also known as browser cookies or tracking cookies, cookies are small, often encrypted text files, located in browser directories. They are used by web developers to help users navigate their websites efficiently and perform certain functions.

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9. What cookies are used on this Website?

The cookies we use on this website are broadly grouped into the following categories:

- **Essential** – Some of the cookies on our website are essential for us to be able to provide you with a service you have requested. An example of this would be a cookie used to enable you to log into your account on the website or which allows communication between your browser and the website. You may not be able to use our website without these cookies.
- **Analytics** – We use analytics cookies to help us understand how users engage with our website. An example is counting the number of different people coming to our website or using a particular feature, rather than the total number of times the site or feature is used. Without this cookie, if you visited the website once each week for three weeks we would count you as three separate users. We would find it difficult to analyse how well our website was performing and improve it without these cookies.
- **User Cookies** – We use cookies to improve your experience by remembering your preferences so we know how you like to use our website. Examples of this would be remembering you so that you are served with the same content or to remember you when you come back to the site.

For more information on the cookies set by Google Analytics please go to: [Google Analytics Cookie Usage on Websites](#) For more information about cookies and their uses visit [All About Cookies](#).

10. Controlling and Opting Out of Cookies

Your browser or device may offer settings that allow you to choose whether browser cookies are set and to delete them. For more information about these controls and to exercise your cookie preferences, visit your browser or device's help material. If you choose to reject cookies, as noted above, you may not be able to use certain features of our websites and services.

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11. Links to external websites

This website may contain links to external websites. We are not responsible for the privacy policies or content of these sites. When you leave this website, make sure you read the privacy policies of each and every website that collects your personal data. This privacy policy applies only to information that is collected by Hayley's Swimming School.

12. Changes to the Website Privacy Policy

Any changes to this Website Privacy Policy will be posted on this website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any time we decide to use Personal Data in a manner significantly different from that stated in this Website Privacy Policy, or otherwise disclosed to you at the time it was collected, we will notify you by email, and you will have a choice as to whether or not we use your information in the new manner.

13. Your Rights

You have the right to object to how we use your personal information. You also have the right to see what personal information we hold about you. In addition, you can ask us to correct inaccuracies, delete or restrict personal information or to ask for some of your personal information to be provided to someone else.

Right to Object

You can object to our processing of your personal information. Please contact our Data Controller, providing details of your objection.

Access to Your Personal Information

You can request access to a copy of your personal information that we hold, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access by

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contacting us at 'Hayley's Swimming School, Flat 1 16 Church Road, West Kirby, Wirral, CH48 0RW'. Please make all requests for access in writing and provide us with evidence of your identity.

Right to Withdraw Consent

If you have given us your consent to use personal information, you can withdraw your consent at any time and, update your marketing preferences by contacting our Data Controller.

Rectification

You can ask us to change or complete any inaccurate or incomplete personal information held about you.

Erasure

You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

Portability You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

Restriction You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

Personal Data Breach Notification

We ensure best to our ability that our systems and servers are protected from hackers, viruses, intruders and other online and offline problems, however if we experience a data breach of any kind, where a customer's data has been compromised, a notification will be sent to all those affected within 72 hours of becoming aware of the breach.

Make a Complaint

You can make a complaint about how we have used your personal information to us, by visiting your local branch, by contacting our Data

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Controller. You also have the right to lodge a complaint with a supervisory body. The relevant authority in the UK is the Information Commissioner's Office at ico.org.uk We will not make any charge for responding to any request from you to exercise your privacy rights, and we will respond to your requests in accordance with our obligations under data protection law.





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14. Document version control

Version	Changes made	Date of changes
1.1	Updated Personal Data Retention Schedule to include schedule for NHS Test and Trace data - Page 6.	24/10/2020