



## GDPR Statement and Data Protection Policy

### About Us

Swordfish Swim is a provider of swimming lessons, under the Learn to Swim framework, and aquatic services. Swordfish Swim provides lessons for adults and children. Swordfish Swim employs a number of staff to deliver the services who are all governed by the stipulations of our policies and procedures. The Data Protection lead is Michael Vinluan who is the Director of Swordfish Swim .

### GDPR Statement

In May 2018, the EU General Data Protection Regulation (GDPR) replaced the existing 1995 EU Data Protection Directive (European Directive 95/46/EC).

Swordfish Swim currently complies with applicable data protection regulations and is committed to GDPR compliance across its relevant services. Swordfish Swim is dedicated to ensuring we are compliant in all areas.

Swordfish Swim has reviewed all areas of work relating to GDPR and has updated policies, standards and documents, and has undergone training with staff, ensuring all staff are aware of GDPR and what they are required to do.

At Swordfish Swim , we are working hard to serve customers a little better every day. Looking after the personal data you share with us is a hugely important part of this. We want you to be confident that you know your data is safe. Additionally, we work with Kids Club HQ to provide its booking platform who have all data stored on a secured, password encrypted network.

Compliance with the GDPR requires a partnership between Swordfish Swim and our customers in their use of applicable Swordfish Swim services. In this context, Swordfish Swim generally will act as a data processor and our customers generally will act as data controllers.

### Data Protection and Privacy Policy and Procedure

This policy has been written to ensure clear guidance is given around personal data and how Swordfish Swim uses this.

#### **Purposes of Data Collection and Storage**

Swordfish Swim will hold the details of swimmers that has been provided by parents/guardians/swimmers within our secure, offline database and within paper documents securely stored in the Swordfish Swim office. This will include class history and progress notes of each swimmer. Swordfish Swim will hold details, which will be agreed to by the parent and Swordfish Swim will use the data for the following purposes:

- For maintaining accurate and up to date records,
- To respond to any enquiries you may make,
- To administer details with regard to any events in which the swimmer wishes to participate (and/or has permission to participate in),
- To deal with any incidents involving the swimmer,
- To create an individual profile for the swimmer so we can understand and respect preferences and monitor progress.

- To contact you about lessons, events, offers and opportunities available from Swordfish Swim by post, email, online or phone (where you have indicated you are happy to hear about these)

Swordfish Swim also holds data on our staff. Swordfish Swim directors are the only ones (and the individual staff) able to access this data.

### Opt Outs

You have the right to refuse direct marketing and can do so by advising us at the time of enrolment. Should you wish to opt back in at any point you are more than welcome to do so.

### Recording Images – Usage

Swordfish Swim may record the lessons and events in which swimmers participate in, and general images of swimmers may form part of the information we hold and use. In addition to the purposes for general information set out above, Swordfish Swim may use these recordings and images for the purposes of education and training, swimmer analysis, promotion, performance, development and event analysis. Permission will be sought prior to any images or recordings being used.

Please ensure that if you do not want your child's picture taken or filmed, you have ticked the DO NOT CONSENT to photography on photography permission form. Should you wish to change your permission status this must be done in writing addressed directly to the Director. Should Swordfish Swim wish to publish any information with regard to the swimmer we will contact you prior to this to ensure you are happy for this to happen. We anticipate this to be news stories on the website.

## Swimmer Data – Medical Conditions

This information should have been provided via the enrolment form or to Swordfish Swim directly. This information is again stored within our secure, offline database and within paper documents securely stored in the Swordfish Swim office. The swimmer's teacher is made aware of medical conditions on an individual and necessitated basis. These details are held to ensure the swimmer is safe during lessons and any adaptations to the lesson are made to ensure the swimmer can fulfil their potential. Any medical issues are always risk assessed and adaptations made to the lesson, if required.

## Marketing – Images, Videos or Names

Should Swordfish Swim wish to publish an article, social media blog, picture or video of you or the swimmer, Swordfish Swim will contact you prior to this to ensure you are happy for this to happen. We anticipate these areas will predominately be news stories on the website and social media posts following events such as Swimathons and certifications.

## Customer Rights – Data Handling

You are entitled to a copy of your personal data from Swordfish Swim (a small fee will be payable in each case). You are also entitled to amend any of your personal data at any time (by contacting Swordfish Swim directly) such as address changes, medical changes or incorrect information stored.

## Customer Data – Deletion of Data

All customers have the right to have data deleted. This will predominately be when a swimmer leaves Swordfish Swim. Any customer can advise they would like data to continue to be stored for an agreed period. All customers will be kept on the database until they notify Swordfish Swim via email that they no longer wish to be contacted. From this point, all data will be deleted.

## Data Usage

Swordfish Swim will collect new joiner data through an enrolment form issued by hand on the swimmer's first day. The details are entered onto the database and the form is held securely in the Swordfish Swim office. The data will be used to help establish the correct class level for the swimmer and also any adaptations that may be required for the lessons. First and last names will be provided to the swimmer's teacher through a register, along with any vital medical information. This is for the safety of the swimmer.

Following an enquiry for a swimming place it may be necessary to place the swimmer on one of our waiting lists. This list is only accessible by the Swordfish Swim Director and Coordinator. This also applies for current swimmers who wish to have siblings placed on the waiting list. Any pre-existing swimmer wishing to be placed on a waiting list internally for another day, time or venue will have their details stored and used in the same manner.

## Data Sharing

There are instances when it is necessary to share at least partial information held to an outside source other than staff of Swordfish Swim. Any other data sharing will be with prior agreement appropriately sought.

We assure you that the data you provide to Swordfish Swim is secure. Data and details are used to ensure a child is safe, parents/guardians can be contacted, progression can be tracked, medical declarations can be assessed and lessons adjusted if required.

No data is ever passed onto 3rd party marketing companies.

## Swordfish Swim Website

Swordfish Swim does not hold any data pertaining to swimmers or their parents/guardians within the website or any association to the website.

## Summary

Swordfish Swim works with its customers to provide a safe environment for its swimmers, and this includes the safety of their data. Should you have any concerns relating to GDPR or data protection within Swordfish Swim please contact the Data Protection Lead, Michael Vinluan, using the communication methods provided upon enrolment.