

## Privacy Policy

When you supply your personal details to Turner Swim they are stored and processed for 4 reasons:

- We need to collect personal information about you, including medical conditions, in order to provide your swimming lessons. Your requesting lessons and our agreement to provide those lessons constitutes a contract. You can, of course, refuse to provide the information, but if you were to do that we would not be able to provide safe swimming lessons.
  - We have a legitimate interest in collecting that information, because without it we couldn't do our job effectively and safely.
  - We also think that it is in your legitimate interest that we can contact you in order to confirm your bookings and discuss your progress with you.
  - Provided we have your consent, we may occasionally send you updates on the lessons we offer, our availability and other related information. You may withdraw this consent at any time – just let us know by emailing [office@turnerswim.co.uk](mailto:office@turnerswim.co.uk).
1. We will retain your records indefinitely, in order to preserve details of your lessons and progress in case you decide to return to us for swimming lessons in the future. You may request that we delete records held relating to you at any time.
  2. We request that you provide details of any medical conditions in order for our instructors to provide safe and effective swimming lessons for each client.
  3. When attending your lessons, we are required to share your name, next of kin's name and emergency contact number with our venues in order to comply with their safety procedures. Your information is not shared with our venues for any other purpose.
  4. Your records are stored:
    1. Electronically ("in the cloud"), using a specialist booking service. This provider has given their assurance that they are fully compliant with the General Data Protection Regulations. Access to this data is password protected and encrypted, and the passwords are changed regularly.
    2. On our office computers. These are password-protected and backed up regularly.
  5. When booking lessons for the first time online, we ask you to provide details of any relevant medical conditions, and your next of kin's emergency contact details. In case of an emergency, we may share this information with the staff at our venues or other relevant persons to ensure your safety at all times.

6. We will never share your data with anybody outside of Turner Swim, save for in emergencies as outlined above. Only the following people/agencies will have routine access to your data:

- a. The booking service (BookingBug), which manages our booking system and client records
- b. Your instructors, in order that they can provide your lessons
- c. Our office staff, who manage our instructors' diaries and may contact you from time to time regarding your lessons and progress.

7. You have the right to see what personal data of yours we hold, and you can also ask us to correct any factual errors. You can also ask us to erase your records.

We want you to be absolutely confident that we are treating your personal data responsibly, and that we are doing everything we can to make sure that the only people who can access that data have a genuine need to do so. To discuss this policy further, please contact [office@turnerswim.co.uk](mailto:office@turnerswim.co.uk). If you are not satisfied with our response, you have the right to complain to the Information Commissioner's Office.