

Privacy Notice



May 2018

Review Date: May 2021

Privacy Notice

Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

in at the deep end Ltd as a company includes the Training Wave brand. Therefore, throughout all of our policies where we refer to in at the deep end it also applies to any bookings or courses undertaken within the Training Wave brand.

Responsibilities

The Data Protection Officer (DPO) is responsible for ensuring that this notice is made available to data subjects prior to in at the deep end collecting/processing their personal data.

All Employees of in at the deep end who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

Privacy Notice

Who are we—in at the deep end provides swimming lessons for all ages and abilities across the North East of England as well as accredited and none-accredited courses from a variety of Awarding Organisations.

Our Data Protection Officer (DPO) can be contacted via DPO@inattedeepend.com or at the above address.

The personal information we would like to collect from you is:

Swim School Lessons—initial enrolment

- Parent / guardian (or your own if aged 18+) contact details comprising of name, address, postcode, telephone numbers(s) and email address
- Swimmers name
- Swimmers DOB
- Swimmers medical conditions.
- In order to process any payments we may also take your credit or debit card details, however, this will not be stored or processed by in at the deep end and will instead be processed via WorldPay.

Swim School Lessons—re-enrolment

- As well as the above information should you choose to enrol via Direct Debit a third party company (GoCardless) will process your bank account details on our behalf. in at the deep end will not have any access to this information.

Course Enrolment

- Depending upon the course information will be requested about your personal contact details (name, address, email and phone number) as well as proof of identity and any accredited prior learning. For example to complete swimming teachers course there is a pre-requisite that a Safeguarding and Lifeguarding course will have been completed before the qualification can be awarded.

Employees

- Employees need to provide basic contact information (name, address, telephone number and email address) as well as proof of qualifications.
- We also require some personal information to enable us to process a Disclosure and Barring check via our third party supplier DDC UK. This information will include personal information such as driving licence, passport and recent bills. None of this information is stored by in at the deep end.
- To enable payroll to be processed personal tax information will be required which will be supplied to our third party accountants (Quantum)
- To enable staff to be paid personal bank account details will be required which will be supplied to our bank (the Co-Operative).

The personal information collected is to allow us to run the business. No information is collected unless it is needed for a specific task. For example swim school enrolment information is required to allow teachers to know who should be in their class while medical information allows us to keep all swimmers as safe as possible.

in at the deep end uses the following third party suppliers to process its data:

- WorldPay—for all online card payments
- GoCardless—for all online direct debit payments
- SmartIT—for managing our online systems
- HR Dept.—for managing our employee HR issues
- Quantum Accountancy—for managing our accounts and payroll
- DDC.UK—who process all of our DBS checks
- Co-Op bank—who provide the company banking facilities
- MessageBird—who provide text messaging services linked to our online Portal.

The only special category of personal data held by in at the deep end relates to medical conditions. This is very brief summaries of any conditions with which we may need to provide emergency medical aid for, or, which may alter how we need to deliver our lessons or courses.

Financial Information

- Basic information is required to process invoices and provide our services. This information is for the administration of lessons and does not usually involve swimmers. The administration here covers the processing of paying for the services which in at the deep end require to function. For example, mobile bills, HR and accountancy support, pay pool hire, pay for insurance etc.

Consent—By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for in at the deep end to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used

You may withdraw your consent at anytime inline with Consent Procedure (*9—Consent Procedure*). However please note that without consent to process your data we will be unable to continue your custom.

Disclosure—in at the deep end will not pass on your personal data to third parties without first obtaining your consent.

The following third country organisations may store your personal details to enable in at the deep end to successfully manage its business. However, as per the list above these organisations are not involved in processing your data in anyway:

- Office365—email solution
- Dropbox—cloud data storage
- BaseCamp—company intranet.

All of the above organisations have EU:US Safe Privacy Shield compliance.

Retention Period—in at the deep end will process personal data as per '5—Retention of Records'.

Your rights as a data subject—At any point while we are in possession of or processing your data you, the data subject have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.

- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in below.

All of the above requests will be forwarded on should there be a third party involved as stated above in the processing of your personal data.

Complaints—In the event that you wish to make a complaint about how your personal data is being processed by in at the deep end or third parties as above, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and in at the deep end’s Data Protection Officer (DPO).

The DPO can be contacted via the above contact details or on DPO@inatthedepend.com.

The Supervisory Authority can be contacted, depending upon which organisation is processing your data, by referring to the ‘Our Awarding Bodies’ document from the policies section of our website.

Tel. 0800 840 3084

Email: admin@inatthedepend.com

Website: www.inatthedepend.com

Monitoring and Review

We will monitor all of the feedback that we receive in relation to the issues affected by the Policy and will amend the policy as necessary.

The Policy will be updated with any amendments to existing legislation or new legislation.

In any event, all policies are reviewed annually although updates to versions etc. will only take place every three years should there be no other changes to the policy.

Document Owner and Approval

The Data Protection Officer (DPO) is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

A current version of this document is available to all members of staff on BaseCamp.

This policy was approved by the Company Directors on 2nd March 2018 and is issued on a version controlled basis under the signature of Managing Director.

Date	Version	Author/Contributor	Amendment Details
December 2017	1.00	Mark Mc Nichol	Implementation
May 2018	1.10	Mark Mc Nichol	Addition of Training Wave branding

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