

# Data Portability Procedure



*May 2018*

*Review Date: May 2021*

## Data Portability Procedure

### *Scope*

This procedure applies where a data subject exercises their right to data portability and applies to in at the deep end to receive their data in order to reuse or transfer it to other data controllers.

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.

Data subjects are entitled to ask:

- For a copy of the personal data they have provided to in at the deep end
- For in at the deep end to transmit the data to another data controller.

Within the scope of this procedure is any personal data concerning the data subject that:

- he/she has provided to the data controller knowingly and actively, or through observations of his/her activities by virtue of the service of in at the deep end; and
- has been processed through automated means; and
- has been processed on the basis of the data subject's consent or a contract to which the data subject is a party.

This procedure will most commonly be used when transmitting data directly to another data controller.

This procedure also applies to circumstances when in at the deep end is the "receiving data controller". That is, when personal data from another data controller is received due to the data subject exercising their right to data portability.

### *Responsibilities*

in at the deep end is responsible for transmitting the data without hindrance and ensures that it is transmitted with the appropriate level of security—for example with encryption. in at the deep end should assess the specific risks linked with data portability and take appropriate risk mitigation measures.

The Data Protection Officer (DPO) of in at the deep end is responsible for the application and effective working of this procedure.

## *Procedures*

in at the deep end's online systems allows for all swimmers to be able to log on to our Portal at <https://portal.inatthedepend.com> to see all of the information held on individual swimmers which can be transferred to another organisation.

Should a data subject wish to do this they should download the information from the web page either by printing as a PDF or downloading a screenshot. This can then, if they so wish, be distributed to third parties.

Due to the minimalistic data held by in at the deep end (e.g. personal contact information and badges awarded) we will not transfer this to third parties on users behalf.

## *Receiving personal data*

in at the deep end does not accept or process personal data received from another data controller following a personal data request nor does it retain any data received.

in at the deep end only accepts and retains data that is necessary and relevant to the service being provided and this is via the data subject themselves.

If data is received and it contains third-party data, in at the deep end will inform the data user in question of the need for them to supply it themselves and destroy the data securely.

## *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.

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

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