



HALLIWICK ASSOCIATION OF SWIMMING THERAPY

TEACHING DISABLED PEOPLE TO SWIM

INAUGURATED 1952 Registered Charity Number 250008

'the HALLIWICK ASSOCIATION OF SWIMMING THERAPY LOGO is a registered trademark'
C/o ADKC Centre, Whitstable House, Silchester Road, LONDON, W10 6SB, UK

www.halliwick.org.uk

Affiliated to the International Halliwick Association (IHA)

PRIVACY POLICY

In order to provide the services we do, the Halliwick Association of Swimming Therapy (Halliwick AST) may, from time-to-time, collect and process personal information (data) and, in some circumstances, special categories of personal data about our members and others we come into contact with, via our website or otherwise.

We take your privacy very seriously and therefore, although we know this is a lengthy document, we urge to read this Privacy Policy very carefully because it contains important information about us and:

- Who we are
- Why we collect and process your personal data
- Who we collect and process personal data from/about
- The personal data we might collect and process
- What we might do with your personal data
- Who your personal data may be shared with
- Receiving marketing and further information from us
- The security of your personal data
- How long your personal data is kept
- Your rights concerning any personal data we collect and process about you
- Who you can complain to about how we keep and what we do with your personal data
- If you need extra help, and
- Contacting Halliwick AST's Data Protection Officer

First of all, to help you understand this Privacy Policy, we need to set out a few **definitions**:

Personal Data/Information is any data/information relating to an identified or identifiable natural (living) person (the **Data Subject**); an identifiable **natural person** is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an outline identifier or to one or more factors specific to the physical, psychological, genetic, mental, economic, cultural or social identity of that natural person.

Special Categories of Personal Data is data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic and biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Data Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. For the purposes of this policy, we, Halliwick AST are the data controller.

Data Processor means the natural or legal person, public authority, agency or other body which processes personal data on behalf of the Data Controller.

Who we are

The Halliwick Association of Swimming Therapy ('we' or 'us') is a registered, not for profit charity registered with the Charity Commission of England & Wales and we are a **Data Controller** for the purposes of the General Data Protection Regulation (GDPR) 2018 and the Data Protection Act 1998.

Why we collect and process your personal data

The reason (basis on which) we collect and process your personal data is one or more of the following:

- It might be necessary so that we can provide our services to you or for the performance of a contract with you
- It might be necessary so that we can comply with a legal obligation or our obligations as a registered charity
- It might be because it is in our legitimate interests to do so, and
- In some circumstances, you may have given us your consent (which can be withdrawn at any time by advising our Data Protection Officer – details below)

Who we collect and process personal data from/about

We may collect and process data about the following people or categories of people:

- Our volunteers including but not limited to our trustees and committee members, course organisers, lecturers and trainee lecturers
- Our members and potential members including but not limited to individuals and within clubs, schools and hospitals or similar
- Our customers and potential customers/service users
- Our course attendees and potential course attendees/course applicants
- Our suppliers
- Our advisers, consultants and other professional experts that provide or may provide services to us, and
- Complainants and enquirers

The personal data we might collect and process

The personal data we might collect and process about you will be adequate, relevant and limited to what is necessary and, as far as is reasonably possible, will be accurate and kept up-to-date.

a) Personal information you provide to us

We may collect and process some or all of the following personal data that you provide to us:

- Your name
- Your address

- Your telephone number
- Your email address, and
- Your organisation (such as a club or school or other organisation with which you are involved)

We do not collect personal data directly through the website and your use of our website does not disclose to us any personal data about you. However, we may collect personal data about you for example by:

- You communicating with us (including by telephone, email or post)
- You downloading a form from the website, completing and returning it to us
- You applying for membership of the association, and
- You applying for a place on a course being run by the association

b) Special categories of personal data

As set out in the definitions above, special categories of personal data are any data which relates to the following:

- Your ethnic origin
- Your political opinions
- Your religious beliefs
- Whether you belong to a trade union
- Your physical or mental health or condition
- Your sexual life and orientation, and
- Whether you have committed a criminal offence

The special categories of personal data we may collect and process about you will be very limited but it may be necessary to collect and process data about you concerning your physical or mental health or condition and, in particular any disability you may have or have had which might affect your safety or that of our members/volunteers as it relates to our or their activities, including swimming and water activity.

c) Personal information you provide about third parties

If you give us information about another person, you confirm that the other person or the person responsible for that other person (for example the Data Protection Officer in his/her club, teacher in his/her school, his/her parent, guardian or care provider) has appointed you to act on their behalf and agreed that you:

- Shall consent on their behalf to the processing of their personal data
- Shall receive any data protection notices on their behalf, and
- Shall consent on their behalf to the processing of their sensitive personal data

What we might do with your personal data

We may collect and process personal data and monitor communications such as emails and telephone calls for the following purposes:

- Provision and promotion of our goods and services including the processing of orders
- Provision of education and training
- Maintaining of accounts and records
- Supporting and training our volunteers

- Quality assurance
- The fulfilment of our legal obligations including any obligations we have as a registered charity, and
- For our legitimate interests

Who your personal data may be shared with

There are very strict rules about who we can share your information with and this will normally be rarely done. Where it is done, we will ensure that appropriate safeguards are in place. We may share information about you to:

- A trusted data processor known to us whom we engage strictly as a data processor only for the purposes of processing orders for our publications and equipment and who will not otherwise process your data and who will act only under our instructions
- For legitimate reasons and with your consent (which may be withdrawn at any time), with medical advisors, healthcare professionals, social and welfare organisations
- Legal and other advisors in our legitimate interests
- Courts and tribunals
- Our insurers
- Those necessary to fulfil any legal obligations including any obligations we have as a registered charity, and
- Law enforcement agencies in connection with any investigation to help prevent unlawful activity

Receiving marketing and further information from us

We may send you information about our products and services including our newsletter which may be of interest to you. Such information could be sent by post or email.

We will ask whether you would like us to send you further information including our newsletter on the first occasion that you provide any relevant contact information. If you do opt in to receive such information from us, you can opt out at any time (see 'Your rights concerning any personal data we collect and process about you' below for further information). If you have any queries about how to opt out, or if you are receiving communications from us that you do not want, you can contact us using the details provided below.

The security of your personal data

- We will ensure that all the personal data that you provide to us is kept secure using appropriate technical and organisational measures
- In the event of a personal data breach, we have in place procedures to ensure that the effects of such a breach are minimised and we will liaise with the Information Commissioners Office (ICO) and with you as appropriate
- More information is available from Halliwick AST's Data Protection Officer (see below)

How long your personal data is kept

- We will not keep your personal data for longer than is necessary either for its purposes or in our legitimate interests
- We will normally keep your personal data throughout the period of time that we provide goods or services to you and afterwards for a period of 6 years as we are required to do by law
- More information is given in our Data Retention Policy which is available on request from Halliwick AST's Data Protection Officer (see below)

Your rights concerning any personal data we collect and process about you

You have the following rights under the GDPR:

- Right to be informed
- Right of access
- Right to rectification (correction of mistakes)
- Right to erasure (right to be forgotten) under certain circumstances
- Right to restriction of processing
- Right to data portability, and
- Right to object

Right of Access

- You have a right to see the information we hold about you
- To access this information, you need to provide a request in writing to Halliwick AST's Data Protection Officer (see below), together with proof of identity
- We will usually process your request free of charge and within 30 days. However, in some circumstances, we reserve the right to charge a reasonable administration fee and to extend the period of time by a further 2 months if the request is manifestly unfounded or vexatious and/or is very complex in nature
- Further details are available in our Data Subject Access Policy which is available on request from Halliwick AST's Data Protection Officer (see below)

Right to correct any mistakes in your information

You can ask us to correct any mistakes or update your information which we hold free of charge. If you would like to do this, please:

- Email, call or write to us (using the contact details below)
- Let us have enough information to identify you, and
- Let us know the information that is incorrect and what it should be replaced with

Right to erasure

- You have a right to ask us to erase your personal data in certain circumstances as set out in Article 17 of the GDPR
- We will deal with your request free of charge and within 30 days but reserve the right to refuse to erase information that we are required to retain by law or regulation, or that is required to exercise or defend legal claims
- To exercise your right to erasure, please contact Halliwick AST's Data Protection Officer (see below)

Right to ask us to stop contacting you with direct marketing

You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please:

- Email, call or write to us (using the contact details below)
- Let us have enough information to identify you, and

- Let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by post)

From time-to-time we may also have other methods to unsubscribe from any direct marketing including for example, unsubscribe buttons or web links. If such are offered, please note that there may be some period after selecting to unsubscribe in which marketing may still be received while your request is being processed.

Who you can complain to about how we keep and what we do with your personal data

- If you are unhappy about how we are using your information or how we have responded to your request, initially you should contact Halliwick AST's Data Protection Officer (see below)
- If your complaint remains unresolved then you can contact the Information Commissioner's Office (ICO), details available at www.ico.org.uk

If you need extra help

If you would like this policy in larger print, please contact us using the details below.

Contacting Halliwick AST's Data Protection Officer

Halliwick AST's Data Protection Officer is William Wyatt. If you have any questions or want more information about this Privacy Policy or data we hold about you, then please contact him:

By email to: halliwickast.chair@gmail.com

By post to: William Wyatt
Data Protection Officer
Halliwick AST
C/o 12 St Joseph's Close
Luton
LU3 1ST, UK

By telephone to: 0044 (0) 1582 521 750