

## FIRST SWIM: [PRIVACY POLICY](#)

This policy relates to the [www.firstswimlondon.co.uk](http://www.firstswimlondon.co.uk) and the operations of First Swim Ltd, the website is the property of First Swim Ltd.

First Swim is committed to preserving the privacy of all our customers personal information who visit our website and/or premises. Please read the following privacy policy to understand how we use and protect the information that you provide to us

This privacy policy covers all data that is shared by a customer with us whether via [www.firstswimlondon.co.uk](http://www.firstswimlondon.co.uk) directly, via email or face to face with our colleagues.

### Information that we may collect from you

When you visit our premises, register or order products or services on [www.firstswimlondon.co.uk](http://www.firstswimlondon.co.uk) you may be asked to provide certain information about yourself and your family members, including your name, contact details and - if making an online purchase - credit card details.

We use a third party specialist secure card processing provider when taking payments. First Swim Ltd does not hold your card details.

We may also collect information about your usage of our website as well as information about you from messages you post to the website and e-mails or letters you send to us.

We maintain a complete list of all personal information that we hold, the source of that information, who we share it with, what we do with it, the lawful reason for holding this information and where we keep it. This can be found below:

Information Held	Source	Mandatory Field	Shared with	How used	Lawful use	Retained for
Name	Booking System	Y	Internal Only	Booking Management	Contract	24 months after last booking
Email Address	Booking System	Y	Internal Only	Booking Management, Customer Contact (dependent on Marketing Preference)	Contract	24 months after last booking
Phone Number	Booking System	Y	Internal Only	Booking management	Contract	24 months after last booking
Shipping Address & Post Code	Booking System	Y	Internal Only	Booking Management	Contract	24 months after last booking
Website	User Maintenance	N	Internal Only	Not Used	N/A	24 months after last booking
Facebook address	Booking System	N	Internal Only	Not Used	N/A	24 months after last booking
Twitter User	Booking System	N	Internal Only	Not Used	N/A	24 months after last booking

Information Held	Source	Mandatory Field	Shared with	How used	Lawful use	Retained for
SKYPE	Booking System	N	Internal Only	Not Used	N/A	24 months after last booking
Pinterest	Booking System	N	Internal Only	Not Used	N/A	24 months after last booking
Google+ ID	Booking System	N	Internal Only	Not Used	N/A	24 months after last booking
Personal Bio	Booking System	N	Internal Only	Not Used	N/A	24 months after last booking
Profile Picture	Booking System	N	Internal Only	Not Used	N/A	24 months after last booking
Company	Booking System	N	Internal Only	Not Used	N/A	24 months after last booking
Billing Address & Post Code	Booking System	Y	Internal Only	Payment	Contract/ payment	24 months after last booking
Country	Booking System	Y	Internal Only	Payment	Contract/ payment	24 months after last booking
Childs Name	Booking System	Y	Internal Only	Booking & Attendance Management	Contract	24 months after last booking
Childs Date of Birth	Booking System	Y	Internal Only	Booking & Attendance Management	Contract	24 months after last booking
Marketing Preference	Booking System	Y	Internal Only	Marketing	N/A	24 months after last booking

First Swim Ltd will ask your consent when we capture and start to process your personal information. Our privacy policy is visible and needs to be read and agreed to by the customer at the booking stage – along with our T&Cs.

### Use of Your Information

Your information will enable us to provide you with access to all parts of our website and to supply the goods or services you have requested.

It will enable us to bill you and to contact you where necessary concerning your orders. We will also use and analyse the information we collect so that we can administer, support, improve and develop our business.

In addition, we may use the information for the following purposes:

To provide information on other products which we feel may be of interest to you, where you have consented to receive such information.

To notify you about any changes to our website or services, such as improvements or developments or product changes

Further, where you have consented, we might also use your information to let you know by email, SMS or post about other products and services which we offer which may be of interest to you.

First Swim Ltd will never share your information with 3<sup>rd</sup> parties unless instructed by you to do so or when it is necessary to enable us to provide you with the service being purchased.

We have a list of places where we keep personal information. This can be found below:

<b>Name</b>	<b>Purpose</b>	<b>Location</b>	<b>Security</b>
Internal Database System	First Swim data hub for customers records and booking management	First Swim Premises	Servers protected to GDPR required standards
Dedicated application server - Fasthosts	Hosts data for First Swim booking management system	Secure data centres across Europe	Servers protected to GDPR required standards

First Swim has a publicly accessible privacy policy that outlines all processes related to personal data (this document) and this is also available on our website [www.firstswimlondon.co.uk](http://www.firstswimlondon.co.uk)

### **Disclosure of your information**

Where applicable and where you have consented, we may disclose your personal information to carefully selected third parties or any member of our group. This includes, where applicable, our subsidiaries, our holding company and its other subsidiaries (if any). They may contact you by email. If you change your mind about being contacted by these companies in the future, please let us know at [info@firstswim.co.uk](mailto:info@firstswim.co.uk)

If our business enters into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent

### **Accountability and Management**

First Swim has a DPO (A Data Protection Officer) and we make sure our technical security is up to date.

Any personal data breaches will be reported within 72 hours to the local authority. This report will include what data has been lost, what the consequences are and what countermeasures we have taken. Unless the data leaked was encrypted, we will also report the breach to the person (data subject) whose data you lost

There is a contract in place with the 3rd party companies whom provide First Swim Ltd with tools with which to process personal data, such as our Card Payment processing provider STRIPE.

Deletion of Data – First Swim automatically delete data that we no longer need. For example, we will delete data for customers whose contracts have not been renewed for 24 months/years

Under GDPR you have the right to have your personal data erased if, for instance, the personal data we hold for you is no longer necessary for the purpose for which it was originally collected or processed. The right to erasure is also known as ‘the right to be forgotten’. The right is not absolute and only applies in certain circumstances where applicable.

You have the right to request the restriction or suppression of your personal data in order to limit the way that we use your data; this is an alternative to requesting the erasure of your data. This is not an absolute right and only applies in certain circumstances. You can make a request for restriction verbally or in writing.

The right to data portability gives you the right to receive your personal data you have provided to us in a structured, commonly used and machine-readable format. It also gives you the right to request that we transmit this data directly to another data controller. This right only applies to data collected by us using automated means (i.e. excluding paper files).

You have the right to access your personal data and supplementary information. First Swim provides this facility via 'Your Account' on our website, allowing you to view the information we hold and enabling you to check its validity and the ability to alter it as necessary to ensure its accuracy

## **Cookies**

On occasion, we may gather information about your computer for our services and to provide statistical information regarding the use of our website to our advertisers.

Such information will not identify you personally it is statistical data about our visitors and their use of our site. This statistical data does not identify any personal details. It is used to analyse how visitors to <http://www.firstswimlondon.co.uk/> interact with the website so that we can continue to develop it and make it a better experience for our visitors. We may gather information about your general internet use by using a cookie file that is downloaded to your computer. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer as cookies contain information that is transferred to your computer's hard drive. They help us to improve our website and the service that we provide to you.

All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our website.

Our advertisers may also use cookies, over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements on our website.

## **Storing Your Personal Data**

4.1 We may transfer data that we collect from you to locations outside of the European Economic Area for processing and storing. Also, it may be processed by staff operating outside the European Economic Area who work for us or for one of our suppliers. For example, such staff maybe engaged in the processing and concluding of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all reasonable steps to make sure that your data is treated securely and in agreement with this Privacy Policy.

4.2 Data that is provided to us is stored on our secure servers. Details relating to any transactions entered into on our site will be encrypted to ensure its safety.

4.3 The transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data sent to us electronically and transmission of such data is therefore entirely at your own risk. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

## **Third Party Links**

You mind find links to third party websites on our website. These websites should have their own privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

## **Changes to our privacy policy**

Changes to our privacy policy in the future will be posted to the website.

## **Contacting Us**

We welcome any queries, comments or requests you may have regarding this Privacy Policy. Please do not hesitate to contact us at [info@firstswimlondon.co.uk](mailto:info@firstswimlondon.co.uk).