

Wales National Pool Swansea Privacy Policy

1 General Information

We are committed to protecting the privacy and security of your personal information.

Under data protection law, 'Wales National Pool Swansea' will be acting as data controller. This means that we hold personal information about you, and are responsible for deciding how we store and use that personal information.

As a data controller, we are legally required to provide certain information to individuals whose personal information we collect, obtain, store and use. That information is contained in this document (our "privacy notice").

It is important that you read this document (together with any other privacy notices we may provide to you on specific occasions), so that you are aware of how and why we are using your personal information and the rights you have in relation to your personal information.

This Privacy Policy applies to all members, clients, prospective members and prospective clients of Wales National Pool Swansea, and all delegates who attend an event at the facility.

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
3. Relevant to the purposes we have told you about and limited only to those purposes
4. Accurate and kept up to date
5. Kept only as long as necessary for the purposes we have told you about
6. Kept securely

2 What Personal Information do we hold about you?

We collect any of the following information from our customers and potential customers. This is either face to face within the facility, via our on line booking system, by email, over the phone or via our website. All information requested upon sign-up will be required in accordance with our Terms & Conditions. There are some categories as a perspective member for about whom we will collect personal information to be included for contact.

If you are attending an event by an outside organiser at the facilities including a camp or tournament, the organiser of said event that you are attending (our client) will sometimes supply us with personal information about you.



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Data protection law protects personal information which is essentially any information from which an individual can be identified. There is a type of personal information which receives additional protection because of its sensitive or private nature, this is sometimes referred to as 'special category personal information' and means personal information about an individual's race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (or non-membership), genetics information, biometric information (where used to identify an individual) and information concerning an individual's health, sex life or sexual orientation.

The only 'special category personal information' that will be collected about you will pertain to pre-existing health conditions as it relates to physical activity. This information will be held in accordance with GDPR regulations and only accessible by identify facility staff as it relates to your Health & Safety while at Wales National Pool Swansea.

The information we will collect from members, clients, perspective members and prospective clients who engage with us will include:

- Full name including title
- Home address
- Date of birth
- Home telephone number
- Mobile telephone number
- Private email address
- Photograph for use in management system
- Occupation
- Name of employer, if applicable
- Emergency contact information
- Contact preferences for communication with WNPS including preferred language
- Agreement to all T&Cs and facility policy
- Credit/debit card and/or bank account details if applicable
- If a concession member the verification of that concession membership
- any other information that you supply to us in relation to your person or enquiry

The above information will be contained within a membership record with a unique ID number. For members this means we can recognise you by your photograph and will allow us to ensure that your card is not misused if lost or stolen.

In addition, we may request special category details relating to health conditions, this is to ensure your safety and welfare when using our facilities and participating in the activities we provide.

We may also be required from time to time to request or collect details relating to protected characteristics in accordance with the Equalities Act.

The information we will collect from event participants, or from the event organiser about events participants, will include:



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- Name and preferred title
- Position within an organisation or as a competitor where applicable
- Gender
- Vehicle make, model and registration number
- Allergies or special dietary requirements if applicable
- Information relating to any special requirements that you may have in order to access the facilities
- Emergency contact information
- Credit/debit card and/or bank account details if applicable
- Any other information that you supply to us in relation to your event

In addition, we may request special category details relating to health conditions, this is to ensure your safety and welfare when using our facilities and participating in the activities we provide.

We may also be required from time to time to request or collect details relating to protected characteristics in accordance with the Equalities Act.

3 What will we use your personal information for and what are our legal bases for doing so?

We use the personal information we hold about you for a number of different purposes, which we list below. Under data protection law we need to have a valid legal basis for using your personal information, we also set out below the legal bases which we will be relying upon.

3.1 We use the personal information we hold about you for the following reasons:

- to administer and provide the services that you have requested including or which includes but not exclusive to;
 - contacting you in relation to your membership or booking
 - update on any and all changes to the facilities or memberships including pricing changes and freezes
 - analyse your engagement with our emails and other communications
 - process payments as it relates to membership or event fees

In this case the legal basis that we will be relying upon to process your personal information will be because it is necessary for the performance of the contract between us

3.2 We will also use the personal information we hold about you, if it relates to your role at a company or organisation, for the following reasons:

- to encourage you to book or re-book an event with us
- to analyse your engagement with our emails and other communications
- CCTV & webcam images obtained in the form of video images or still images are collected and temporarily stored. This is for the purpose of providing a safe and secure environment for the benefit of persons using the facilities and WNPS staff.



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In each of these cases the legal basis that we will be relying upon to process your personal information will be because it is in our legitimate interests. Our specific legitimate interests are:

- to operate a sustainable business model
- to enhance our reputation through the provision of an exceptional customer experience

3.3 We will also use the personal information we hold about you, if you have provided specific consent and if it does not relate to data processed under 3.2, for the following reasons:

- to provide you with marketing information about our products and services
- to track how you use and interact with our website
- to analyse your personal booking history, with a view to encouraging further or an increased number of bookings
- to encourage you to take out a membership or renew an existing membership

In this case the legal basis that we will be relying upon to process your personal information will be because you have provided your consent for us to use your personal information in this way.

3.4 We will also use the personal information we hold about you for the following reasons:

- to comply with and demonstrate compliance with immigration law promoting equality of opportunity
- preventing and detecting crime
- to ensure we are compliant with legal requirements

In these cases the legal basis that we will be relying upon to process your personal information will be because it is required for the compliance with a legal obligation.

3.5 In order to keep you updated there will be communications that we need to send you. These include notices about direct debit payments, and progressions, waitlist communications, service messages etc. Without this communication then we would not be able to provide our services to you and they are in accordance with our legitimate basis for processing your data

- to check your identity
- to confirm eligibility where applicable (e.g., student status, passport to leisure etc.)
- to undertake research in assisting with the development of facilities and services
- safeguarding and promoting the welfare of our customers
- ensuring our customers' safety and security

Your data will not be used to make automatic decisions.



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As our products and services are available for people of all ages then for children under 13 then a parent or guardians consent is required before personal information can be provided to us. Without this consent then we will not collect any personal information.

4 What Special Category Personal Information do we hold about you?

We will hold information about medical conditions including pre-existing as it relates to physical activity participation. This information will be disclosed to us by the participants as it affects their Health & Safety while using our facilities. *'In this case the legal basis that we will be relying upon to process your personal information will be because it is in our legitimate interests to keep members safe while they use the facility. It is also in the interests of members to enable us to provide relevant support when necessary.'*

We are also relying on the fact that processing is necessary for us to comply with Health and Safety law

Under Article 9, this processing is necessary for reasons of substantial public interest (with a basis in law)

5 Further general information about using your personal information

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. We do not carry out any automated decision-making or profiling in relation to you.

6 Who do we share your information with?

WNPS will hold your personal data. WNPS may share information with third party organisations that provide specific services on our behalf which may assist us to facilitate the services and facility we offer you or enhance our products and your experience as outlines in sections 3. There are contracts in place with each third party which includes strict terms and conditions to protect your privacy.

From time to time we will need to share your information with other external people and organisations. We will only do so where we have a legitimate or legal basis for doing so and in compliance with our obligations under data protection laws.



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Your information may be disclosed to:

- **Digital marketing service providers** in relation to your interactions with our website
- **The Police, local authorities, the courts** and any other government authority if they ask us to do so (but only if us doing so is lawful).
- **Where we are legally obliged to do so**, e.g. to comply with a court order

8 International Transfer of Your Information

We may transfer your data outside the European Union (EU) but any transfers that do occur will be done in line with current data protection legislation.

9 How Long Do We Keep Your Information For?

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need it for the purposes we acquired it in the first place. Our specific retention schedules are as follows:

Bank details for Direct Debit customers:

- On cancellation of a direct debit the bank details will be removed from the membership record within one calendar month
- Paper records for live direct debits will be retained for no longer than 60 months
- Paper records for expired Direct debit customers will be retained for no longer than 12 months

Membership records:

- The data will be held by us for as long as you remain a member
- Where consent has been provided as a lawful basis for our collecting your data then unless consent is withdrawn it will be held for as long as you are a member with us or when a membership is cancelled and in accordance with industry standard practice for no more than 36 months
- Where legitimate business interest is our lawful basis for collecting your information then the data will be held for as long as the membership is active or when a membership is cancelled and in accordance with industry standard practice for no more than 24 months



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Facility and event bookings:

- Following an enquiry with us, until the end of the calendar year following the first anniversary of your engagement with us
- Following a membership or event; until the end of the calendar year following the second anniversary of your engagement with us

Your data will be retained for as long as you remain a customer with us. Once you cease to be a customer we will retain your information for as long as we deem it useful to be able to contact you (no longer than 3 years) or as is needed to comply with our legal obligations. Where your data is not required for any statutory or legal purpose then you have the right to request that your data is deleted.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

10 Individual rights

Data protection legislation provides individuals with a number of different rights in relation to their data. These are listed below and apply in certain circumstances:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.



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- **Request data portability** of your personal information. In certain circumstances, you may have the right to require that we provide you with an electronic copy of your personal information either for your own use or so that you can share it with another organisation. Where this right applies, you can ask us, where feasible, to transmit your personal data directly to the other party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact:

WNPS Data Protection Officer

Wales National Pool Swansea
Sketty Lane
Swansea
SA2 8QG

Email: wnpsdataprotectionoffice@swansea.ac.uk

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

11 Ability to withdraw consent

Where your personal data is processed on the basis of your consent or explicit consent, you have the right to withdraw your consent to the processing at any time. You can do this by the Data Control Officer identified in section 17. Any withdrawal of consent will not affect the lawfulness of any processing of your personal data based on consent before the withdrawal is notified.

12 Consequences of not providing the data when based on statutory or contractual requirement

WNPS will not be able to administer your booking or membership if you refuse to provide the necessary information when based on contractual requirement.



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13 Security of information

WNPS takes the safeguarding of your data very seriously. The guidelines we use to look after your data are listed below:

- Maintenance of secure systems to protect your personal information
- Your communications preferences will be respected and we will contact you in accordance with your preference (we are currently unable to contact you by text message)
- Your information and communication preferences will be updated promptly when you request we do so
- We will not hold your personal information for longer that is necessary for our legitimate business purposes
- We will respond fully to any request from you to see the information that we hold on you
- We will never sell your personal information to a third party
- We have procedures in place for handling, processing and storing your information

14 Updates to this privacy policy

We review the ways we use your information regularly. In doing so, we may change what kind of information we collect, how we store it, who we share it with and how we act on it.

Consequently, we will need to change this privacy policy from time to time to keep it accurate and up-to-date.

We will keep this policy under regular review to ensure it is accurate and kept up to date. This policy was last updated on 15.12.2020

15 Where to Go if You Want More Information About Your Rights or to make a Complaint

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here http://www.ico.gov.uk/for_the_public.aspx.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. We will always do our very best to solve any problems you may have.



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16 Identity and Contact Details of the Data Controller

Wales National Pool Swansea is the Data Controller and is committed to protecting the rights of individuals in line with the Data Protection Act 1998 (DPA) and the new General Data Protection Regulation (GDPR) and the EU Privacy and Electronic Communications Regulations 2003. (We are registered with the Information Commissioners Office (ICO) reference number Z9495912

17 Contact Details of the Data Protection Officer

Wales National Pool Swansea has a Data Protection Officer who can be contacted via wnpsdataprotectionoffice@swansea.ac.uk They will be in touch regarding all requests. You are welcome to get in touch with us to discuss your information at any time.