

# **PRIVACY AND DATA PROTECTION POLICY**

## **SOUTHERN SWIMMING POOL BOARD**

### **How we use your information**

This privacy policy explains what information the Southern Swimming Pool collects and what that information is used for.

We aim to be fair and honest in managing your personal information. As part of this process, we would like to explain how we use your personal information and inform you of the steps we take to protect that information.

### **What information do we collect?**

- name and gender
- Date of birth
- Contact information including email address
- Demographic information such as postcode
- Other information relevant to customer surveys and or offers with consent
- Health information – for GP referral use.
- Emergency contact details – for children involved in swimming lesson activities.

If you have given your consent but then change your mind you have the right to withdraw this consent at any time by contacting us at Southern Swimming Pool, Arbory Road, Castletown, IM9 1HA. You also have the right to request your details to be erased from our system. However, this may result in us being unable to offer you services.

### **Why do you need my personal information?**

Depending on the activity you are taking part in or service you are using we may need to collect some of your information to provide these services or ensure your safety. Generally, this information is collected at the time you begin to use the services (for example through discussions with our staff) or if you complete an application form.

When you agree to give us your information, we may use it for the following purposes:

- We sometimes collect health related information from you to make sure you will be safe taking part in physical activities.
- For audit and debt collection.
- For statistical reporting.

## Who do you share my personal information with?

We may share your personal information with some agencies including:

- Swimming teachers – for your health and safety and to deliver a more personal service
- Staff taking sessions – for your health and safety and to deliver a more personal service
- Isle of man Constabulary – where IOM Police requests assistance from us and we have a legal duty to assist or where we choose to assist to protect our business, staff or customers. We will only pass on the personal information necessary for their procedures.

We occasionally share your information with partner organisations. We do this for the following reasons:

- We provide statistical reports so that our partners can monitor us to make sure we are achieving the objectives set by the Department of Education, Sport and Culture.
- We also provide statistical reports to some of our partners as part of funding bids to improve our services and facilities.
- Where we share statistical reports, we remove information that identifies you as an individual. Some examples of statistical information we might provide to a partner:
- The age ranges of our customers. We use this information to demonstrate that we provide services and activities for all ages, from children through to adults.

We do not pass your information to any other company for their own marketing purposes.

## Who are your partner organisations?

To deliver our services to local communities and meet our social objectives we work with partner organisations. An example of some of our current partners:

- Department of Education, Sport and Culture, Manx Sport and Recreation
  - Sports Development Unit
  - National Sports Centre
- Department of Health and Social Services
- Regional swimming pools

## How do you protect the information you hold about me?

We store information about you in both electronic and written formats. Where we store written information, it is stored in locked cabinets within our offices. Office access is restricted to employees and authorised partners only.

Your electronic information is stored on our secured network. Only authorised members of our staff are given login credentials to our network and they are only granted the access they require to fulfil

their role at the pool. Our computer applications are further secured by separate passwords and access to these is restricted. We regularly review who has access to these systems and remove access where an employee no longer requires it. We conduct regular data cleansing in line with our GDPR guidelines.

### **Can I access the information you hold on me, if so how?**

Yes, you are entitled to know whether we hold or process any information about you and if we do, you are entitled to a copy of that information. You are further entitled to know the source of that information and who we share it with.

Before we provide a response to a Subject Access Request, we may ask for proof of identity and/or entitlement to access that personal information.

You also have a right to request that we correct any inaccuracies in the information which we hold on you. You should make such requests to us in writing, and may do so by using the addresses in the section headed "To find out more information" below.

You may also ask us to restrict processing but this may mean that you are no longer able to access our services and make use of our facilities.

You also have the right to be forgotten, however this will mean that you will need to reapply for any of our services as information about you will have been deleted and no longer be accessible.

### **Is all information always released?**

The law allows us to refuse your request for information in certain circumstances. For example, if you have previously made a similar request and there has been little or no change in the data since we complied with the original request.

The law also allows us to withhold information where, for example, release would likely to

- prejudice the prevention or detection of a crime
- prejudice the apprehension (arrest) or prosecution of offenders
- prejudice the assessment or collection of any tax or duty
- reveal the identity of another person, or information about them

We will do our best to apply these conditions carefully, without damaging the effectiveness of our work, so that we can meet your requests as often as possible.

### **To find out more information**

If you would like to know more about how your information is used, how we maintain the security of your information and your rights to access information we hold on you, please contact:

The Data Controller  
Southern Swimming Pool,  
Arbory Rd,

Castletown,  
IM9 1HA      Tel: 823930

Alternatively, you may wish to speak to:

The Data Protection Officer  
Alexander Elliott,  
Sovereign House,  
4 Christian Rd  
Douglas,  
IM1 1EB      Tel: 623333

If you wish to complain about any aspect of our privacy policy or our use of your data you have the right to complain to the Information Commissioner at P.O. Box 69, Douglas, Isle of Man, IM99 1EQ  
Telephone: +44 1624 693260 Email: [ask@inforights.im](mailto:ask@inforights.im)

## **Changes**

We keep our privacy notice and data protection procedures under regular review. This privacy notice was last updated in November 2023.