



The Flipper Club Privacy Policy

The Flipper Club Ltd (The Flipper Club) respects your privacy and is committed to protecting your personal data.

This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights with The Flipper Club generally and how the law protects you.

In this privacy policy we explain how we collect and use your personal information. 'We' are The Flipper Club Ltd (hereinafter referred to as The Flipper Club) and we are the data controller for the purposes of the Data Protection Act 2018 and the EU General Data Protection Regulation.

Details of how to contact us if you have any questions about privacy or data protection can be found below in the Contact Details section.

We must have a lawful basis to process your personal data, and this policy explains what our lawful basis is in respect of each purpose for which we keep and use information about you.

Generally, we are allowed to process your personal data where it is necessary in connection with a contract between us (such as a contract to supply our products or services), where it is necessary in order for us to comply with our legal obligations, or where we have a legitimate interest to do so (but we will always consider whether your right to privacy overrides our interest).

Please note that links from our website may take you to external websites which are not covered by this policy. We recommend that you check their privacy policies before submitting any personal information to such sites. We will not be responsible for the content, function or information collection policies of these external websites.

This website was created and continues to be managed by SquareSpace and as such they will process your data on our behalf when you visit our website. They will only use your data for the purposes outlined below.

What information do we collect about you and how do we collect it?

You are not required (by law or by any contract with us) to provide personal information to us via this website. We will only require you to provide personal information to us where it is necessary for us to provide you with a service at your request.

Information you provide to us

We collect personal information about you when you enquire about our services (swimming lessons) and join the waiting list.

We may receive personal information about you whenever you contact us. *For example, by doing the following:*

- Enquiring about our services, products or events
- Signing up for our newsletters and further information or registering your interest
- Using and browsing our website
- Telephoning, texting, writing by post or emailing us
- Enquiring about, or applying for, job vacancies or workforce development opportunities

This information may include the following:

- Normal identification information, such as your full name, date of birth, age, gender, the name(s) of your child(ren) / swimmers, relationship to child(ren)
- Contact information, such as your postal address, email address and telephone number / mobile number
- Additional information relevant to your use of our site and services, such as your marketing preferences, survey responses, feedback and swimming ability
- Health and medical information relevant to swimming with The Flipper Club
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- Records of your attendance at any events hosted by us;
- Images in video and/or photographic form and voice recordings.
- Payment information (this is securely collected and processed by our payment provider)
- In respect of job applications, your CV including details of your education and employment history (and any other information which you may choose to provide to us with your CV)

Information we collect about you on our website

We collect information using cookies and other similar technologies to help distinguish you from other users of our website. These can streamline your online experience by saving you from re-inputting some information and also allow us to make improvements to our website. For more information about how and why we use cookies, please take a look through our Cookie Policy. When you visit our website we may collect the following information:

- Which pages you view and which links you follow
- Your IP address and general location
- Details of the hardware and software that you are using to access the site
- Any passwords that you use on our website
- If you choose to log in using a third party, we will record your login provider
- A device identifier (cookie or IP address) for fraud prevention
- Details of your visits to our website and the resources that you access

We do not knowingly process Personal Data of anyone under 13 years old, if we become aware that a data subject is under 13 years old we will only process their data with the valid consent of the parent or holder of parental responsibility of the data subject to the processing of that Personal Data.

Information we collect about you from other sources

We may collect information about you from other sources. This may include the following:

- Publicly available information, from sources such as Companies House and the Electoral Roll.
- Information you have shared publicly, including on social media.
- If you apply for a job or a volunteer position, we may collect information about your criminal record by obtaining a DBS check through an approved agency.
- Information from third party databases or data suppliers, such as credit reference agencies.

This list is not exhaustive and, in specific instances, we may need to collect additional data for the purposes set out in this policy.

Information we receive about you from other sources

Sometimes you will have given your consent for other websites, services or third parties to provide information to us.

It could also include information from third parties that we work with to provide our products and services, such as payment processors, delivery companies, technical support companies and advertising companies. Whenever we receive information about you from these third parties, we will let you know what information we have received and how and why we intend to use it.

How do we use your personal information?

We take data protection law seriously, so below we have set out exactly how and why we use your information, and what our legal basis is to be able to use your information in each way.

Providing our services and supplying our products

It is necessary for us to use personal information about you to enter into and perform the contracts that we make with you, such as when you become a customer. Using your information in this context is necessary so that we can:

- Provide you with information about the services or products
- To carry out our obligations arising from any contract that we have with you
- Verify your identity
- Deal with any complaints you may have
- Contact you about any changes that we make to our services, events or organisation
- Administer our website, including troubleshooting problems, analysing statistics, conducting research and tests and keeping the site secure

- If you enquire about, or apply for, a job vacancy, it is necessary for us to use your personal information as part of the recruitment process, in order to assess your suitability for a particular role.

Telling you about events or other products or services that we think may be of interest to you

We may use your information to identify and tell you about events and our products or services that we think may be of interest to you. We will only do this where you have informed us that you would like to receive marketing communications.

We may also use your information to invite you to participate in market research. If we do contact you about market research, you do not have to participate. If you tell us that you do not want to receive market research communications, we will respect this.

Whether you choose to receive marketing communications, or market research communications is entirely up to you. You can choose to receive both, none, or just one or the other. Your choice will not affect any products or services that you have purchased from us, nor will it affect any quotes for products or services you buy in future.

You can update your preferences by using the unsubscribe links in any of our emails to you, or by getting in touch using our website or contacting us as set out below.

Telling you about products or services that are similar to ones that you have already bought

If you have already contacted us about a product or service, we may contact you with some information about services and events that are similar.

You can choose not to receive these communications at any time.

Making our organisation better

We always want to offer the best services, events and experience that we can. Sometimes this means we may use your information to find ways that we can improve what we do, or how we do it.

In this context, we will only use you information where it is necessary so that we can:

- Review and improve our existing services and develop new ones
- Review and improve the performance of our systems, processes and staff (including training)
- Improve our site to ensure that content is presented in the most effective manner for you and for your computer
- measure and understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you

Contacting you

We want to stay in touch with you. Sometimes we may need to use the information that we have about you in order to respond to your questions or let you know about important changes. We will only use your information in this respect where it is necessary so that we can:

- Interact and respond to any communications you send us, including where you use the Contact section, and any social media posts that you tag us in

- Let you know about any important changes to our business or policies

Verifying your identity

We may use your information where it is necessary for us to do so in order to meet our legal obligations or to detect and prevent fraud, money-laundering and other crimes.

Protecting you and others from harm

We may use your information where it is necessary to protect your interests, or the interests of others. This may include in the event of criminality such as identity theft, piracy or fraud. We need all the categories of information listed above to allow us:

- (i) to provide our services to you;
- (ii) to enable us to comply with legal obligations; and
- (iii) to pursue legitimate interests of our own or those of third parties (provided your interests and fundamental rights do not override those interests).

The situations in which we will process your personal data are listed and set out in the table below and indicate the purpose or purposes for which we are processing or will process your personal information.

	Perform Our Contract With You	Comply With Legal Obligations	Pursue Legitimate Interests
Verifying your identity	x	x	x
Making a decision to supply our services	x		
Administering the contract we have entered into with you	x		
Make the benefits of services available to you	x		x
To contact you in order to seek your consent to receive offers and benefits from our commercial partners, sponsors and suppliers			x
Dealing with any complaints you may have	x		x
Logistics management and planning, including accounting and auditing		x	x
Making arrangements for the termination of our contract	x		x
Making repairs, alterations and improvements to the services supplied	x	x	x
Dealing with legal disputes involving you		x	x
Complying with health and safety obligations	x	x	x
To detect and prevent fraud, money- laundering and other crimes		x	x

To review and improve the performance of our systems, processes and staff			x
To interact and respond to any communications you send us, including social media posts that you tag us in			x
To let you know about any important changes to our business and policies			x
To ensure that the information that we hold about you is accurate and up to date			x
To protect your interests, or the interests of others (such as in the event of criminality such as identity theft, piracy or fraud)		x	x

Change of purpose

We may contact you in the future to advertise and market new swim school benefits and offers from our suppliers. However, we will always seek your consent before sending such material and we would always give you the opportunity to unsubscribe.

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. If we need to use your personal information for an unrelated purpose we will notify you and we will explain the legal basis which allows us to do so.

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.

Who do we share your personal information with?

Sharing your information within The Flipper Club

We share the information that you provide to us with our staff so that we can provide our services to you.

Sharing your information with third parties

We may share your data with selected third parties. For example, we may share your information with:

- Internet hosting providers to host the website, related infrastructure, services and applications, our internet provider is SquareSpace www.squarespace.com
- Contact management systems to send emails, instant messages, social media messages and SMS messages, currently our provider is Mailchimp www.mailchimp.com
- Service providers: for example payment processors, supply chain partners and sub- contractors and IT services (including CRM), GoCardless www.gocardless.com

There are certain exceptional circumstances in which we may disclose your information to third parties. This would be where we believe that the disclosure is:

- Required by the law, or in order to comply with judicial proceedings, court orders or legal or regulatory proceedings

- Necessary to protect the safety of our employees, our property or the public
- Necessary for the prevention or detection of crime, including exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction.
- Proportionate as part of a merger, business or asset sale, in the event that this happens we will share your information with the prospective seller or buyer involved

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

How long do we keep your personal information?

We will only store your personal information for as long as we need it for the purposes for which it was collected. Where we provide you with any service, we will retain any information you provide to us at least for as long as we continue to provide that service to you.

If you apply for a job vacancy (or otherwise send us your CV) we will retain your CV (and any publicly available information, for example from social media) for a period of 6 months. If we are considering you for a particular role, we may retain this information for longer than that period.

In all other circumstances, we will keep all physical and electronic records of your information for a period of 6 years after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked for us.

How do we protect your personal information?

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy.

We try to ensure that all information you provide to us is transferred securely via the website. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access.

All information you provide to us is stored on secure computers and cloud storage. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

What rights do you have in respect of your personal information?

- *You have the right to be informed*

We have a legal obligation to provide you with concise, transparent, intelligible and easily accessible information about your personal information and our use of it. We have written this policy to do just that, but if you have any questions or require more specific information, you can get in touch using Contact section of the website.

- ***You have the right to access your personal data***

You have the right to ask us to confirm whether or not we hold any of your personal information.

If we do, you have the right to have a copy of your information and to be informed of the following:

- Why we have been using your information
- What categories of information we were using
- Who we have shared the information with
- How long we envisage holding your information

In order to maintain the security of your information, we will have to verify your identity before we provide you with a copy of the information we hold.

The first copy of your information that you request from us will be provided free of charge, if you require further copies we may charge an administrative fee to cover our costs.

- ***You have the right to correct any inaccurate or incomplete personal data***

Where you have requested a copy of the information we hold about you, you may notice that there are inaccuracies in the records, or that certain parts are incomplete. If this is the case you can contact us so that we can correct our records.

- ***You have the right to be forgotten***

There may be times where it is no longer necessary for us to hold personal information about you. This could be if:

- The information is no longer needed for the original purpose that we collected it for
- You withdraw your consent for us to use the information (and we have no other legal reason to keep using it)
- You object to us using your information and we have no overriding reason to keep using it
- We have used your information unlawfully
- We are subject to a legal requirement to delete your information

In those situations you have the right to have your personal data deleted. If you believe one of these situations applies to you, please get in touch using our website.

- ***You have the right to have a copy of your data transferred to you or a third party in a compatible format***

Also known as data portability, you have the right to obtain a copy of your personal data for your own purposes. This right allows you to move, copy or transfer your personal data more easily from one IT system to another, in a safe and secure way.

If you would like us to transfer a copy of your data to you or another organisation in a

structured, commonly used and machine-readable format, please contact us. There is no charge for you exercising this right.

- ***You have the right to object to direct marketing***

You can tell us at any time that you would prefer that we do not use your information for direct marketing purposes. If you would not like to receive any direct marketing from us, please contact us or use the links provided in any of our marketing communications, and we will stop sending direct marketing immediately.

- ***You have the right to object to us using your information for our own legitimate interests***

Sometimes, we use your personal information to achieve goals that will help us as well as you.

This includes:

- When we tell you about services, products or events that are similar to ones that you have already engaged with, bought or attended
- When we use your information to help us make our business better
- When we contact you to interact, communicate or let you know about changes we are making

We aim to always ensure that your rights and information are properly protected. If you believe that the way we are using your data is not justified due to its impact on you or your rights, you have the right to object. Unless we have a compelling reason to continue, we must stop using your personal data for these purposes.

In order to exercise your right to object to our use of your data for the purposes above, please contact us.

- ***You have the right to restrict how we use your personal data***

You have the right to ask us to stop using your personal data in any way other than simply keeping a copy of it.

This right is available where:

- You have informed us that the information we hold about you is inaccurate, and we have not yet been able to verify this
- You have objected to us using your information for our own legitimate interests and we are in the process of considering your objection
- We have used your information in an unlawful way, but you do not want us to delete your data
- We no longer need to use the information, but you need it for a legal claim If you believe any of these situations apply, please contact us.

- ***You have rights related to automated-decision making and profiling***

Any automated decision-making or profiling we undertake is solely for the purpose of tailoring the information which we provide to you. We will not use automated decision-making or profiling to make any decisions which will have a legal effect upon you or otherwise significantly affect you, and you have the right not to be subject to such decisions. If you have any concerns or questions about this right, please contact us.

Changes to our Privacy Policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

This version was last updated on 1st March 2021 and historic versions can be obtained by contacting us.

Complaints

If you wish to make a complaint about our collection or use of your personal data, please contact us in the first instance so that we may seek to resolve your complaint.

You have the right to lodge a complaint with the Information Commissioner's Office (ICO), the statutory body which oversees data protection law in the UK. Please visit the [ICO website](#) if you wish to lodge a complaint with the ICO.

Contact Details

In the event of any query or complaint in connection with the information we hold about you, please email amandalsharples@gmail.com write to us at The Flipper Club Ltd, 109 Eastwick Park Avenue, Bookham, Surrey KT23 3NW