

### Introduction

Survive and Save Training Ltd is committed to respecting your privacy. The purpose of this Privacy Policy is to explain how we will use any personal data we collect about you, the rights you have over any personal data we hold about you, and to tell you about the policies and procedures that we have in place to respect your privacy and keep your personal data secure. This policy details how we comply with the Data Protection Act 2018 and General Data Protection Regulations (GDPR)

This Privacy Policy applies to you if you book training courses or swimming classes with us, or receive direct marketing by email or text message from us, or work or support the delivery of training courses for us.

### How and when do we collect personal data

We will receive your personal data when you provide them to us yourself or when you book one of our courses, programmes or swimming classes.

Personal data will be collected through email and telephone enquiries, mailing list sign up forms, booking and application forms and purchasing goods or services from us

We also receive personal data about you from third parties. Third parties who provide us with personal data about you include:

- employers booking courses or programmes on behalf of their employees;
- other organisations or individuals booking courses, programmes or classes on behalf of other individuals;
- Information collected about criminal records by obtaining a DBS check through an approved agency when applying for a job

We will combine any personal data about you that we receive from you and from third parties.

### The categories of personal data we collect and use

The categories of personal data we collect and use include:

- name;
- address;
- date of birth, age and/or age range;
- gender;
- email address;
- telephone number;
- information about the services we provide to you (including for example, what we have provided to you, when and where and, if applicable, how much you paid);
- information you provide to us with when you contact us by phone, email, post, or when you communicate with us via social media;
- information you provide to us about your health or specific needs (for example when you book one of our courses or programmes, necessary information for potential medical emergencies, and reasonable adjustments or special considerations);
- information you provide us about your ethnicity



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- information about electronic communications you receive from us, including whether that communication has been opened and if you have clicked on any links within that communication;
- answers you provide when you respond to competitions, votes and surveys;
- other personal data which you may disclose to us when you use or support the delivery of our services at any time.

### How we use your personal data

All personal data that we obtain about you will be used in accordance with current data protection law and this Privacy Policy. We, or third-party data processors acting on our behalf, will process your personal data as follows:

- As necessary, to **perform a contract with you**, for example a training course booking, including, where applicable, taking or receiving payments and course delivery.
- As necessary, to **comply with a legal obligation**, for the following purposes:
  - where you exercise your rights under data protection law and make requests; and
  - to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity.
- As necessary, for our **legitimate interests** in providing course or programme delivery etc and ensuring they operate safely, securely and in a commercially suitable way which is tailored to your use and interests, for the following purposes:
  - to provide you with the training course, programme or swimming classes;
  - to verify your identity for security purposes;
  - to help us to ensure our customers are genuine and to prevent fraud;
  - to ensure the security of our websites, mobile applications and other technology systems;
  - for the good governance of our business, including keeping financial records, to allow us to pay suppliers and to charge, invoice or refund customers;
  - to provide you with information about our training courses, programmes or swimming classes, to contact you about administrative matters, and to manage and respond to any queries, complaints or appeals you make or any correspondence you send us;
  - for the purpose of marketing our courses or programmes from other companies, including sending marketing communications and, where applicable, processing your registration, creating custom marketing audiences on third-party websites such as Facebook, and profiling and automated decision-making relating to our marketing;
  - to “geo-fence” marketing so that you receive marketing communications or see advertisements which are relevant to your location;
  - to operate competitions, including notifying you if you have won, to confirm delivery of a prize or for other related purposes; and
  - for market research and statistical analysis and to analyse the use of our services so that we can improve them.
- Based on **your consent**, for the following purposes:
  - to send you marketing communications.

- Based on **your explicit consent**, when you provide us with personal data about your health or specific requirements, for the following purposes:
  - to ensure that we provide reasonable adjustments/special considerations for any disability, health related illness or specific requirement or consideration;
  - to ensure that we are aware of any health-related issues that may create a medical emergency while on one of our courses.

If you win a competition, we may publicly post some of your data on our website or mobile application (for example acceptance of a prize may also require you, unless prohibited by law, to allow us to post publicly some of your personal data such as on a winner's page). However, we will not post your data publicly without your express consent.

### Sharing Information

We share the information that you provide us with our workforce and affiliates (including tutors, trainers and awarding organisations) as reasonably required for any of the purposes above. Staff and affiliates are not entitled to use your information for their own purposes. However, awarding organisations (e.g. Swim England Qualifications, RLSS UK) are required to keep learner records to satisfy their regulators.

Information may be shared with third parties service providers if necessary and reasonably required for any of the purposes above for example but not exclusively:

- Internet hosting providers to host the website, related infrastructure, services and applications
- Contact management systems to send emails, SMS messages, social media messages
- Service providers for example payment processors and supply chain partners
- Learning Management Systems to manage and track learner progress and assessments during courses.
- Learning records service for them to issue / verify unique learner numbers and update personal learning records in relation to administration of your qualification

### Personal Learning Records

Some of the information you supply will be used by the Education and Skills Funding Agency to issue you with a Unique Learner Number (ULN) and to create your Personal Learning Record, if you want one. For more information about how your information is processed, and to access your Personal Learning Record, please refer to <https://www.gov.uk/government/publications/irs-privacy-notices>

### How long do we keep your personal data?

We will normally retain your personal data for as long as you use our services and for up to seven years after your last use of our services or your last interaction with us (for example, the last time you opened an electronic communication from us or visited one of our websites).

A summary of the types of personal data processed by us is listed in the table below.

Please note that we will retain your personal data for longer than the specified time span if we believe we may need them in order to respond to any claims, to protect our rights or the rights of a



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third party. We will retain your personal data for longer if we are required to retain them in order to comply with applicable laws.

We will always retain your personal data in accordance with current data protection law and never retain your personal data for longer than is necessary.

### Summary of Personal Data Processed by Survive and Save Training Ltd

Type of Data	Purpose	Legal Basis	Retention Period
<b>Staff / Employment / Workforce</b>			
Personnel – Names / Addresses / Telephone Numbers / Email addresses / roles / evidence of qualifications, training or licences / DBS data / Bank details / Conflicts of Interest	Administration	Performance of a contract Legitimate interests	7 years after employment ceases
Personnel – Contracts	Administration	Performance of a contract Some processing may be legitimate interests	7 years after employment ceases
<b>Crash Courses</b>			
Swimmers and Responsible adults – Names / DOB / Gender / telephone numbers / email addresses	Administration	Performance of a contract Legitimate interests Explicit consent (mailing lists / booking forms)	removal from mailing lists or 2 years after last contact (whichever is earlier)
<b>RLSS UK Qualifications / Awards</b>			
Course candidates – Names / Addresses / Telephone numbers / Email addresses / DOB / Emergency Contact Details	Qualification administration	Performance of a contract	7 years from date of assessment
Course candidates - learning needs, disabilities / ethnicity /Reasonable adjustments and Specific conditions applied for and granted or refused	Qualification administration	Explicit consent Legal obligation	7 years from date of assessment
Assessment Records – IQA records / EQA records /	Qualification administration	Legitimate interests	7 years from date of assessment

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Standardisation training / Personal performance records / Practical assessment records / Theory assessment answer sheets.			
Details of reassessment / complaints / appeals / litigation	Qualification administration	Legitimate interest Legal obligation	7 years from date of assessment
<b>Swim England Qualifications</b>			
Course Learners – start date / name / address DOB / telephone numbers / email address / evidence of eligibility and prerequisites / date of registration / date certs requested / learner outcomes / Emergency contact details	Qualification administration	Legitimate interests	Up to 6 years following related learner registrations Up to 7 years where the business believes there is the possibility of claims against it
Course learners - learning needs, disabilities / ethnicity /Reasonable adjustments and Specific conditions applied for and granted or refused / Conflicts of Interest	Qualification administration	Explicit consent Legal obligation	Up to 6 years following related learner registrations Up to 7 years where the business believes there is the possibility of claims against it
Details of reassessment / complaints / appeals / litigation	Qualification administration	Legitimate interest Legal obligation	Up to 6 years following related learner registrations Up to 7 years where the business believes there is the possibility of claims against it
Learner Portfolio sample – one complete learner portfolio retained per qualification per year	Qualification administration	Legitimate interests Explicit consent	Indefinitely
Learner Portfolios (General)	Qualification administration	Legitimate interests	Up to 6 months from final outcomes/issuing of certificates

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			Up to 7 years where there the business believes there is the possibility of claims against it
Assessment records – Assessment tasks / IQA sampling plans / IQA reports and associated learners' work / EQA reports / summary of assessment decisions / standardisation activities	Qualification administration	Legitimate interests	Up to 1 year from final learner outcomes / issuing of certificates
<b>Suppliers</b>			
Names / Addresses / Telephone Numbers / Email addresses / Bank details	Administration	Performance of a contract Some processing may be legitimate interests	7 years after involvement ceases

### Your rights

You may contact our Data Protection Officer by email at [enquiry@surviveandsave-training.org](mailto:enquiry@surviveandsave-training.org) at any time, to:

- request that we provide you with a copy of the personal data which we hold about you;
- request that we update any of your personal data which are inaccurate or incomplete;
- request that we delete any of your personal data which we are holding;
- request that we restrict the way that we process your personal data;
- request that we provide your personal data to you or a third-party provider in a structured, commonly-used and machine-readable format;
- object to us processing personal data based on our legitimate interests; or
- object to us processing your personal data for direct marketing purposes.

Your request must include your name, email address and postal address and we may request proof of your identity. Please allow at least 20 working days for us to process your request.

### Withdrawing your consent

Where we are processing your personal data based on your consent, you may change your mind and withdraw your consent at any time.

You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email.

You can also withdraw your consent to receive marketing communications or any other consent you have previously provided to us by contacting us at [enquiry@surviveandsave-training.org](mailto:enquiry@surviveandsave-training.org).

The consequence of you withdrawing consent might be that we cannot do certain things for you.



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### Right to lodge a complaint with a supervisory authority

You may also make a complaint to a supervisory authority for data protection matters. In the UK, this would be the UK Information Commissioner's Office (<https://ico.org.uk/>). If you live in another EEA country, you may complain to the supervisory authority in your country. Alternatively, you may seek a remedy through local courts if you believe your rights have been breached.

### How do we protect your personal data?

We use industry standard technical and organisational security measures to protect your personal data. We keep your personal data secure by implementing policies, procedures and access controls so that only authorised members of our staff or authorised third parties can access your personal data. We protect our information technology systems with firewalls, anti-virus and anti-malware software and other information security technology solutions. When we transfer your personal data to third parties electronically, we use encryption.

We cannot guarantee the security of your personal data when you transmit it to us. For example, if you email us your personal data, you should be aware that email is not a secure transmission method. As such, you acknowledge and accept that we cannot guarantee the security of your personal data transmitted to us and that any such transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access.

Where we have given you (or where you have chosen) a password which enables you to access one of our services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

### Links to other websites and mobile applications

We sometimes provide you with links to other websites or mobile applications, but these websites and mobile applications are not under our control. We are only responsible for the privacy practices and security of our services. We are not responsible for the privacy policies, content or security of any linked websites or mobile applications. We recommend that you check the privacy and security policies of each and every website and mobile application that you visit.

In some instances, a third party may operate or host a competition on our website or mobile application, and collect your personal data. In those cases, where we are not the operator or host of the competition, we have no control over the personal data collected and accordingly urge you to review the third party's privacy policy before participating.

### Changes to our Privacy Policy

We reserve the right to change our Privacy Policy from time to time. Any such changes will be posted on this page so that we can keep you informed about how we process your personal data. We recommend that you consult this page frequently so that you are aware of our latest Privacy Policy and can update your preferences if necessary. Your continued use of our services shall constitute your acceptance of any revised Privacy Policy.



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### Contact details

Email: [enquiry@surviveandsave-training.org](mailto:enquiry@surviveandsave-training.org)

Postal address:

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