



**Le Mourier**

**Data Privacy**



**Policy & Procedures**

*Service Strategy*



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## **Introduction**

This Privacy Policy explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We understand that there is a lot of information here but we want you to be fully informed about your rights, and how Le Mourier uses your data. We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update the Privacy Policy from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

## **Explaining the legal bases we rely on**

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including;

### ***Consent***

In specific situations we can collect and process your data with your permission. For example you tick a box to receive email newsletters.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service we provide.

### ***Contractual obligations***

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, in order for us to register candidates with certification and awarding bodies.

### ***Legal Compliance***

If the law required us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity affecting Le Mourier to law enforcement.

### ***Legitimate Interest***

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will use your email address details to send you direct marketing information telling you about products and services that we think you might be of interest to you.

### ***When do we collect your personal data?***

- When you visit any of our websites, and use your account to purchase products, or redeem vouchers from Le Mourier Swim Sea Save on the phone, in the office or online.



- When you create an account with our third party providers for example Bookeo.
- When you purchase a product by phone but don't have (or don't use) an account.
- When you engage with us on social media.
- When you contact us by any means with queries, complaints etc.
- When you book any kind of appointment, training course.
- When you choose to complete any surveys we send you.
- When you comment or review any of our products/services. Any individual may access personal data related to them, including opinions. If a comment or review includes information about a third party provider, it may be passed on to them if requested.
- When you fill any any forms, for example, application forms, accident forms, comment forms.

#### ***What sort of data do we collect?***

- If you have an account with us through our booking portal (i.e bookeo) we will retain the information requested for creating your account. This will include your name, address, date of birth, phone numbers, email address, medical information, children's names, purchase history, payment method, payment amount.
- If you have purchased any of our products direct with the office or any of our off site locations, for example swimming lessons, training courses, we will collect your name, address, date of birth, phone numbers, email address, medical information, children's names, purchase history, payment method, payment amount.
- Copies of documents you provide to prove your age or identity where the law requires this (including your passport and driving licence). This will include details of your full name, address, date of birth and facial image. If you provide a passport, the data will also include your place of birth, gender and nationality.
- Details of your visits to our website and which site you came to from ours.
- Information gathered by the use of cookies in your web browser.
- Your comments and reviews.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.
- Images of persons when participating in any of our activities.



### ***How and why do we use your personal data?***

We want you to have the best possible customer experience. We will use certain aspects of your personal detail to offer products and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest level of service.

Of course, if you wish to change how we use your data, you'll find details in the '***What are my rights***' section of this policy. If you choose not to share your personal data with us, or refuse certain contact permissions, we will not be able to provide you with some of the services you may ask for. For example, informing you of cancellations, end of term, payment deadlines.

### **Here's how we will use your personal data and why:**

- To process any orders for services that you make by using our websites or via the office. If we don't collect your personal data at this time we won't be able to process your request and comply with our legal obligations.
- To respond to your queries, refund requests or complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligation to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service.
- To protect our business from fraud or other legal activities.
- With your consent we will use your personal data, preferences and details of your transactions to keep you informed by email, telephone, web about relevant products and services.

Of course, you are free to opt out of hearing from us by any of these channels at any time.

- To send you personalised communication with regards to our products or services.
- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Data Privacy Policy .
- To comply with our contractual or legal obligations to share data with law enforcements.
- To send you survey or feedback requests to help improve our services.

Sometimes we will have to share your details with a third party who is providing a service (such as awarding bodies for publishing/awarding certificates).



### **How we protect your data**

We know how much data security matters to all our customers. With this in mind we will treat all your data with the utmost care and take all appropriate steps to protect it.

Access to all personal data is password protected and sensitive data such as payment card information is secured by encryption.

We regularly monitor our system for possible vulnerabilities and attacks and we carry out auditing to ensure the systems in place are adequate.

### **How long will we keep your personal data?**

Whenever we collect or process your personal data we will only keep it as long as is necessary for the purpose which it was collected. At the end of the retention period your data will be deleted completely.

### ***Customer Data Retention Periods:***

#### ***Swim School / Holiday Camps***

When you sign up for swimming lessons or holiday camps we will keep the personal data you give us for 5 years so we can comply with our legal obligations.

#### ***Professional /Accredited Training Courses***

When you sign up for any courses run by Le Mourier we will keep the personal data you give us for the validity of the certificated award. For example, First Aid at Work is valid for 3 years. After this time all personal detail will be deleted.

### **Who do we share your personal data with?**

We sometimes share your personal data with trusted third parties.

- We provide only the information they need to perform their specific service.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your data is respected and protected at all times.

#### ***Third parties we work with:***

- IT companies who support our website and other business systems.



- Operational companies such as awarding bodies.
- Direct Marketing companies who help us manage our electronic communications with you.
- Facebook to show you products and activities that might interest you.

We currently use the following companies who will process your personal data as part of their/our contract with them:

- Bookeo
- MailChimp
- Xero
- GoCardless
- STA
- RYA

***Sharing your personal data with third parties for their own purposes:***

We will only do this in specific circumstances:

- For fraud management we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This will include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory bodies, Government agencies in your country of origin or elsewhere, upon a valid request to do so.

**What are your rights over your personal data?**

***An overview of your different rights***

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing.
- That we stop any consent-based processing of your personal data after you withdraw that consent.



You can contact us to request to exercise these rights at any time as follows:

***To ask for information please contact The Data Protection Officer, Inverness Lodge, Le Mont au Meunier, St Lawrence, Jersey, JE3 1FQ or email [stuart@lemourier.co.uk](mailto:stuart@lemourier.co.uk). Where you have an online account ie our booking system, any information requiring to be corrected or updated, please update your account online.***

### **Your right to withdraw consent.**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### **Direct Marketing**

You have the right to stop the use of your data for direct marketing activity. To stop the direct marketing, click the **unsubscribe** link in any email we send you. If you have a Bookeo account, log into your account to deactivate or amend the settings.

### **Checking your Identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Data Privacy Policy.

If you have authorised a third party to act on your behalf, we will ask them to prove they have your permission to act.

### **Any Questions?**

We hope this policy has been helpful in setting out the way we hold and use your personal data and your rights to control it.

If you have any questions please contact the following:

- Email - [stuart@lemourier.co.uk](mailto:stuart@lemourier.co.uk)
- Or Write - ***Data Protection Officer, Le Mourier Swim/Sea/Save, Inverness Lodge, Le Mont au Meunier, St Lawrence, Jersey, JE3 1FQ***



**Document Control**

<b>Owner</b>	Le Mourier Swim School & Aquatic Centre Team of Directors
<b>Author</b>	Stuart Diack - Swim School Manager and Training Lead

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