

## **Puggles Swim School Privacy Notice and Cookie Policy**

**Puggles Swim School Limited, 48 Back Hill, Ely, CB7 4BZ** (“Puggles Swim School”, “we”, “us”, “our”) is committed to protecting and respecting your privacy. You may contact us by email at [admin@mypuggles.com](mailto:admin@mypuggles.com). This policy sets out the basis on which any personal data we collect from you, or that you provide to us (or a third party provides to us), will be processed by us in relation to your use of our website [www.puggles-swim.co.uk](http://www.puggles-swim.co.uk) (the “**Website**”) and/or the MyPuggles Platform [www.mypuggles.com](http://www.mypuggles.com) (the “**Platform**”)

### **Our role**

For the purpose of the Data Protection Legislation (which includes the Data Protection Act 1998 or, from the date it comes into force, the General Data Protection Regulation (Regulation (EU) 2016/679) (“**GDPR**”)) and any other applicable laws relating to the protection of personal data and the privacy of individuals in force in England, we are the Data Controller and our address is as set out at the start of this policy.

We will only process your personal data in accordance with this policy and in accordance with Data Protection Legislation.

We fully respect your right to privacy in relation to your interactions with the Website and use of the Platform and endeavour to guarantee to be transparent in our dealings with you as to what information we will collect and how we will use your information.

### **Information that we collect about you**

- **Directly from you**

We collect information from you via the Website and Platform. For example, when filling out forms on the Website and/or Platform or by requesting or being invited to use the Platform and/or any information that you provide when using the Website and Platform, or by corresponding with us by phone, e-mail or otherwise. This may include information such as:

- your name, address, e-mail address and phone number;
- information you provide when sending enquiries and /or requests for support;
- information you provide when searching for information and if applicable, participating in discussions boards or other social medial functions on the Website and/or the Platform;
- financial and credit card information;
- medical information about you or your children
- personal profile/description; and

- photographs.

We also use cookies on the Website and Platform, see below for more information about how we use them.

- **IP Addresses**

We will automatically collect your IP address (an IP address is a number that can uniquely identify a specific computer or other network device on the internet) each time you visit and use the Website and/or Platform. This allows us to identify the location of users, to block disruptive use and to establish the number of visits from different countries. We analyse this data for trend and statistics reasons, such as which parts of the Website and/or Platform users are visiting and how long they spend there.

**How do we use the information we hold about you?**

For as long as we have access to your personal data, we will use it for the purposes set out in the table below, unless otherwise required as a result of you exercising your data protection rights. We may use your personal data for any of the below purposes, whether we obtained it directly from you (or someone you trust), or another source.

<b>Purpose</b>	<b>Legal basis</b>
To administer the Website and Platform and for internal operations including providing login details, troubleshooting, data analysis, testing, research, statistical and survey purposes.	Processing by us, and by our data processors, will be necessary for us to provide the Website and Platform to you.
To process your payment for use of the Platform, where applicable	Our legitimate interest in obtaining payment before and after performing our contract with you.
To provide you with information that you request from us, or to respond to your enquiries made directly to us.	For the purposes of performance of our contract in order to respond to your requests and enquiries, e.g. by email, telephone, post or social networks.
To provide you with information in respect of the Website and/or Platform.	Our legitimate interest in order to keep you update of any changes to the Website and/or Platform.
To provide you with any support that you may request in relation to the use of the Website and/or Platform.	For the purposes of performing our contract in order to respond to your requests for support.

To ensure that features and content from the Website and Platform are available for you (if you choose to use them) and are presented in the most effective manner for you and for your devices.	Providing the Website and Platform in accordance with our contract.
To check and confirm that we carry out your instructions accurately, to enable us to review and improve our services and operations and develop new and changed, services and operations.	Providing the services, choices, operations, the Websites and Platform in accordance with our contract.
To keep the Website and Platform safe and secure.	Our legitimate interest in ensuring that the Website and Platform are safe and secure for use.
For us to take legal or administrative action, including to collect debts (if applicable), resolve disputes with you, and deal with regulators.	Enforcing our contract in respect of the Website and/or in resolving any disputes with you, in dealing with regulators and as necessary for us to establish, exercise or defend legal claims.
To contact you if you have chosen to subscribe to our mailing list to receive updates from us	We will ask for your consent to provide updates to you when you subscribe to our mailing list. If you change your mind you are entitled to unsubscribe and we will remove you from our mailing list.

## **Cookies**

### **What is a cookie?**

A cookie is a text-only file that is placed on your computer by another computer on the internet to enable that computer to know when you are visiting a particular Website. They are widely used in order to make Websites work, or work more efficiently, as well as to provide information to the Website owners. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <http://www.aboutcookies.org> or <http://www.allaboutcookies.org>. Please be aware that if you decline to accept cookies from the Website and/or Platform, it may prevent you from taking full advantage of the Website.

### **Why do we use Cookies?**

Our Website uses cookies to distinguish you from other users of the Website and to distinguish which webpages are being used. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. We only use information collected from cookies for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us to provide you with a better Website by enabling us to monitor which webpages you find useful and which you do not. This helps us to provide you with a good experience when you browse the Website and also allows us to improve the Website.

### **What cookies do we use?**

Our Website uses:

- **Strictly Necessary Cookies.** These are cookies that are required for the operation of the Website. They include, for example, cookies that enable you to log into secure areas of the Website, use a shopping cart or make use of e-billing services.
- **Analytical/Performance Cookies.** These cookies allow us to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This helps us to improve the way the Website works, for example, by ensuring that users are finding what they are looking for easily.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. However, note that the Website and Platform are not designed for use with browsers where JavaScript or cookie functionality has been disabled and as mentioned above access to the Website and/or Platform may be restricted if you are using these types of browsers or if you disable cookies.

### **How long we hold your personal information**

We will only hold your personal information for as long as is necessary or until, in accordance with your rights, you make a request to us to stop processing your personal data in accordance with this policy.

### **We may contact you**

For administrative reasons related to our management of the Website and Platform we may contact you to provide further information in respect of the Platform or address any related queries that you have raised relating to the Website and/or Platform. We may also periodically contact you by email for the purposes set out above.

## **Disclosure of your information**

For so long as we have access to your personal data, we may share any of it with any of the following to the extent that they need to have access to your personal data in order to perform their role:

- any employee within our organisation;
- selected third parties who help us to perform our services or to provide you with access to the Website and/or Platform. This includes third parties that help us directly such as analytics and search engine providers that assist us in the improvement and optimisation of the Website and Platform and IT service providers who may help us to provide, maintain, improve, manage and/or fix the Website and/or Platform (or associated IT facilities);
- our professional service providers, such as accountants, auditors, legal advisers and insurance brokers;
- any third party company or companies in the event that we go through a business transition, such as a merger, being acquired by another person or company, or selling a portion of our assets.

We may also disclose your personal information to:

- third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, and other agreements; or to protect the rights, property, or safety of Puggles Swim School. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **How we protect your personal information**

We do our utmost to protect user privacy through the appropriate use of the security technology. We ensure that we have appropriate physical and technological security measures in place to protect your information; and we ensure that when we outsource any processes that the service provider has appropriate security measures in place. However, the Website may contain hyperlinks to Websites owned and operated by third parties. These third party Websites have their own privacy policies, including cookies. We do not accept any responsibility or liability for the policies of such third party websites and your use of such websites is at your own risk. Please check these policies before you submit any personal data to third party websites.

## **Where we store your personal data**

The data that we collect from you will only be stored and processed within the European Economic Area (the “EEA”). We may transfer your data to third parties operating or managing the Website and/or Platform on our behalf. By submitting your personal data, you agree to this processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this policy. All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which

enables you to access our Website and/or Platform, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

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 Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **Changes to this policy**

This policy may be updated from time to time, so you may wish to check it each time you submit personal information to the Website and/or Platform. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use the Website and Platform to submit personal information. If material changes are made to this policy, we will notify you by placing a prominent notice on the Website and Platform.

### **Your rights**

Under Data Protection Legislation:

- If you have subscribed to our mailing list you have the right to unsubscribe and ask us not to process your personal data for the purpose which you subscribed. You may unsubscribe at any time by emailing us directly at [admin@mypuggles.com](mailto:admin@mypuggles.com).
- If you become aware of any inaccuracies in your personal data which we process on your behalf or such personal data is incomplete, you have a right to request that such inaccuracies are rectified. On receiving your request we will either action such request or explain why we have decided not to action such request.
- To the extent that (a) we no longer need to use your personal data (e.g. you no longer wish to receive marketing from us or (b) we rely on your consent and you have withdrawn it, or (c) you object to our legitimate interests for using your personal data and no exception applies to permit us to keep using it, or (d) it is established that we did not have the lawful right to process personal data, or (e) the law requires us to erase your personal data, You may ask us to erase your personal data. If we erase your personal data, your ability to use the Platform will be affected and we will not be able to recover your account information.
- You have the right to object to our processing of your personal data to the extent that (a) we use the personal data on grounds of our legitimate interests and no exception applies to permit us to keep using it, or (b) we use it for marketing purposes (e.g. to send you updates) and you would like to withdraw your consent, or (c) we use it for scientific or historical research purposes or statistical purposes and no exception applies to permit us to keep using it.
- You have the right to ask us to restrict our processing of your personal data to the extent that (a) you have questioned the accuracy of the personal data and we are still

checking its accuracy, (b) it is established that we did not have the lawful right to process the personal data, (c) we no longer need to use your personal data for the purposes we collected or used it for but you need it to be preserved for the purposes of legal claims, or (d) you have exercised your right to object to our use of your personal data and no exception applies to permit us to keep using it.

- You have the right under the GDPR to request that we provide to you, or to another data controller on your behalf, a copy of any of your personal data which we have received from you so that may reuse such personal data for your own purposes across different services.
- you have the right to complain to the Information Commissioner (<http://www.ico.gov.uk/>) if you have any concerns in respect of the handling of your personal data by us.

If you would like to exercise any of the above rights, please contact us at [admin@mypuggles.com](mailto:admin@mypuggles.com).

Please note that personal data will be held in a non-anonymised form for a period of up to 12 months following closure of your account/erase of your personal data as part of our regular system backup schedule.

### **Access to information**

The Data Protection Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with the Data Protection Legislation. You can submit a data access request at any time by contacting us at [admin@mypuggles.com](mailto:admin@mypuggles.com)

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