



## Happy Tiddlers Privacy Policy

### **Happy Tiddlers Privacy Policy**

This privacy policy describes how Happy Tiddlers Ltd ('we' and 'us') collect, retain, use and store your information when you (whether you are a person or a business) interact with Happy Tiddlers via our website and booking software.

Happy Tiddlers is fully compliant with the General Data Protection Regulations (GDPR). We process personal client data to facilitate the booking of our classes and courses. We do not share any data we hold with third parties.

### **Our Website**

We collect very little information from the viewers' visits to our website. Absolutely no personal information is collected from our visitors. The website statistics gathered by our web hosting company records server requests only, e.g. the IP address and date of visit. This is like every other server on the web.

### **Our Booking Software**

Our client data is stored via a secure third-party cloud software application whose privacy policy is available upon request. Data we collect from you for the purposes of booking our classes and courses:

- Your name
- Your Address
- Telephone numbers (normally a mobile number)
- Email addresses
- Your children's names and dates of birth
- Medical history for you and your children (if applicable)

We keep the number of communications we send to a minimum, and will only send you information related to the following:

- Booking confirmations and reminders
- Venue information/updates
- Health & safety issues relating to your swimming
- Payment receipts
- Happy Tiddlers Newsletters
- Offers and promotions
- Invitation to next term

To enable Happy Tiddlers to fulfil our contractual responsibilities, the information you supply on the booking form and consent to contact you, is a requirement to continue swimming with us.

### **Data Relating to Children**

We will not collect data relating to children without the express permission of a parent or legal guardian. In practice, we only collect and retain the following information relating to children:

- Child's name
- Date of birth
- Medical history (if appropriate)



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### **Card Payments and Purchases**

Happy Tiddlers is PCI compliant, in accordance with these regulations we do not store debit or credit card details on site. If you have given us consent to retain your debit or credit card, your details are stored via secure third-party merchant providers on their systems. They are encrypted, except for the last four digits of the card number and its expiry date and cannot be viewed by any member of the Happy Tiddlers team.

### **Our Lawful Basis for Processing your Data**

When you visit us, become a member or contact us via email or social media we may ask permission to store your details in our booking software and mailing lists.

For existing customers who are attending classes and courses, we store, retain and use your data to provide the services agreed in your contract with us.

For new customers, all our systems require a positive opt-in before we can send you communications. We will undertake this process with you for each system during your initial registration. For lapsed customers, we may from time to time, send you communications about our products and services which we believe you have a legitimate interest in receiving. You can opt-out of these communications at any time.

### **Protecting Your Data**

Your data is stored via a small number of third-party cloud software applications with whom we have individual contracts and service level agreements. Each provider has their own security and privacy policy, copies of which are available upon request by contacting Happy Tiddlers. Any internal data we hold is stored either on our own hardware or via cloud storage. All our internal systems are password protected and user access is restricted.

### **Data Retention**

We do not hold your data any longer than is necessary to provide you with our services or to comply with applicable law. We would expect to retain, store and use your data for the lifespan of your children's swim journey with us. Whilst we do not place a specific timeframe on the retention of our personal data, we periodically review our records and remove, edit, archive or delete data we deem surplus to requirements. Happy Tiddlers Ltd is also required, by law, to retain financial information relating to its business practices for up to 7 years.

### **Your Rights**

In accordance with the GDPR you have the following rights:

- to be provided with access to your personal data held by us;
- to request the rectification or erasure of your personal data held by us;
- to object to the collection of your data and request that we cease processing your data;
- to request that we restrict the processing of your personal data while we investigate your concerns with this information;
- to object to solely automated processing; and
- to request that your data be transferred to a third party (data portability)