

PRIVACY NOTICE

1. PURPOSE OF THIS NOTICE

This notice describes how we collect and use personal data, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

Please read the following carefully to understand our practices regarding personal data and how we will treat it.

For the purposes of this notice, 'Data Protection Legislation' is defined as, for the periods in which they are in force, the European Data Protection Directive 95/46/EC, all laws giving effect or purporting to give effect to the European Data Protection Directive 95/46/EC (such as the Data Protection Act 1998) or otherwise relating to data protection (to the extent the same apply) and, from 25 May 2018, the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR") or any equivalent legislation amending, supplementing or replacing the GDPR.

2. ABOUT US

London City Swim ("we", "us", "our" and "ours") is a charitable incorporated organisation (CIO) registered charity number 1171676.

General Data Protection Regulation (GDPR) provides the legal framework that defines how personal information can be used. London City Swim is fully committed to complying with the principles set out in GDPR and has a legal duty to protect any information we collect from you. We are the 'data controller' in respect of your personal information, and are responsible for what happens to it, where it goes, and who sees it.

We have appointed a Data Protection Officer. Our Data Protection Officer is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details below.

3. HOW WE MAY COLLECT YOUR PERSONAL DATA

We obtain personal data about you, for example:

- when you enquire about our activities – including fundraising and trading – register with us, send or receive an email, make a donation to us, ask a question or otherwise provide us with personal information. We may also receive information about you from third parties, for example from fundraising partners.
- via our website, such as which pages users visit most often and which services, events or facilities are of most interest. We may also track which pages users visit when they click on links in emails.
- If you provide services to London City Swim, we will collect information in line with your contract for services.

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4. THE KIND OF INFORMATION WE HOLD ABOUT YOU

The information we hold about you may include the following:

- your personal details from when you or your organisation register for an event (such as name, title, email address, physical address, telephone numbers etc.).
- our correspondence and communications with you.

5. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU

We will only obtain and use this information, where relevant, to:

- raise further awareness of London City Swim and the work we do.
- help raise further funds to our charitable objectives.
- learn how best to contact you (and what about).
- keep a record of your support.

We may also process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data.

We may also process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Data retention

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- any statutory or legal obligations.
- the purposes for which we originally collected the personal data.
- the lawful grounds on which we based our processing.
- the types of personal data we have collected.
- the amount and categories of your personal data.
- whether the purpose of the processing could reasonably be fulfilled by other means.

Change of purpose

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Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

6. DATA SHARING

Why we might share your personal data with third parties?

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

Which third-party service providers might process your personal data?

"Third parties" includes third-party service providers. The following activities are carried out by third-party service providers: IT, event hosting and management marketing services and banking services.

All our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

We do not sell personal details to other charities or other third parties.

7. TRANSFERRING PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

If we need to share your personal data with a recipient outside the European Economic Area ("EEA") (e.g. a third party cloud based software provider may host information on its servers located outside of the EU) we will ensure we do so in compliance with European Data Protection Legislation, including where applicable by ensuring that the transfer is necessary to perform a contract in place with you or a contract entered into in your interests. If these transfers affect you, you may contact us to obtain more precise information and a copy of relevant documentation.

8. DATA SECURITY

We have put in place reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

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Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our data protection point of contact, listed below.

10. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to participating in a swim event), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our data protection point of contact listed below.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

11. CHANGES TO THIS NOTICE

This privacy notice was last updated on 18 09 2018.

12. COMPLAINTS

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If you consent to us contacting you, we will always aim to be respectful, relevant and appropriate. If at any time you do not think that we have complied with this, please contact us straight away to let us know.

You also have the right to make a complaint to the Information Commissioner's Office. For more details please visit the ICO website.

13. CONTACT US

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, or for any other reason listed above, please email our Data Protection Point of Contact via email at enquiries@londoncityswim.com.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive.