



1 Introduction

- 1.1 The controller for your personal data is the Mount Kelly Foundation. Mount Kelly Swimming Limited is a trading subsidiary of the Mount Kelly Foundation. Personal data relating to swimming memberships, bookings and facility hire arrangements is held within the Foundation's systems and may be accessed by authorised Foundation staff where necessary for operational, technical, safeguarding, regulatory or administrative purposes.

2 How the School uses your data

- 2.1 Personal data will be processed for the administration of swimming memberships, facility hire arrangements, swimming programmes, health and safety management, safeguarding, customer support and related operational activities.
- 2.2 Depending on the activity concerned, personal data is processed because it is necessary:
- to take steps prior to entering into a contract;
 - for the performance of a membership agreement or facility hire agreement;
 - to comply with legal obligations;
 - to protect health, safety and wellbeing; and
 - for the legitimate interests of Mount Kelly Foundation and Mount Kelly Swimming Limited in operating and developing swimming facilities and services.
- 2.3 Where special category personal data is processed, this will be done in accordance with applicable data protection legislation.
- 2.4 We will generally obtain personal data directly from you. In some circumstances, we may obtain information from parents, guardians, schools, clubs, coaches, medical professionals or other authorised representatives where this is necessary to administer membership, participation, safeguarding or health and safety requirements. Where required by law, we will inform you when personal data has been obtained from another source.
- 2.5 The provision of certain personal data is necessary to process applications, administer memberships, manage facility hire arrangements, ensure participant safety and enable us to fulfil our contractual and legal obligations.
- 2.6 Neither Mount Kelly Foundation nor Mount Kelly Swimming Limited undertakes solely automated decision-making that produces legal or similarly significant effects on members, hirers or participants.
- 2.7 Personal data may be shared within the Mount Kelly Foundation and its authorised service providers where necessary to administer memberships, facility hire arrangements, safeguarding responsibilities, health and safety requirements, financial administration, IT support and other operational activities. Appropriate contractual, organisational and technical measures are in place to protect personal data.
- 2.8 As Mount Kelly Swimming Limited is part of the Mount Kelly Foundation group, personal data may be accessed by authorised Foundation employees, including administrative, finance,

compliance, safeguarding and ICT staff, where access is necessary for them to carry out their duties.

- 2.9 We do not sell personal data to third parties and do not permit third parties to use personal data for their own marketing purposes.
- 2.10 Personal data will generally be retained for twelve months after a membership ends or a facility hire arrangement concludes. Certain records may be retained for longer where required for safeguarding, legal, insurance, regulatory, financial or health and safety purposes.
- 2.11 Personal data may occasionally be processed outside the United Kingdom through carefully selected service providers. Where personal data is transferred outside the United Kingdom, appropriate safeguards will be implemented in accordance with UK data protection legislation.

3 Your rights

- 3.1 Depending on the processing activity concerned, we rely on one or more of the following lawful bases:
- taking steps prior to entering into a contract;
 - performance of a contract;
 - compliance with legal obligations;
 - legitimate interests; and
 - consent where specifically required.
- 3.2 In addition to the rights described in the General Privacy Notice, you may have the right to:
- request access to your personal data;
 - request correction of inaccurate personal data;
 - request erasure of personal data in certain circumstances;
 - request restriction of processing;
 - object to certain forms of processing; and
 - request portability of personal data where applicable.
- 3.3 You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.
- 3.4 We will publish on our website any changes we make to this data protection statement and notify you by other communication channels where appropriate.
- 3.5 If you have concerns about how we have handled your personal data, we encourage you to contact us first so that we can try to resolve the issue. You also have the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

4 Questions and further statutory information

- 4.1 The controller for your personal data is the Mount Kelly Foundation.
- 4.2 The Privacy Officer is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, and can be contacted at privacy@mountkelly.com.
- 4.3 Please contact us through the address given above if you have any concerns or questions about the above information. Where you have specific requests relating to how we manage your data, we will endeavour to resolve these, but please note that there may be circumstances where we cannot comply with your specific request.