



SwimTayka Privacy Policy

Introduction And General Terms

SwimTayka promises to take great care with your personal data, and we commit to protecting any personal information we obtain about you, whether you are visiting our website as a supporter, shopper, volunteer or campaigner. This Privacy Policy sets out how and why we obtain, use and protect personal information and contains the following sections:

Who We Are

SwimTayka is a registered charity in England and Wales (charity number 1176079).

This Privacy Policy applies to all the above entities.

SwimTayka's registered address is 48 The Causeway, Chippenham, Wiltshire, SN15 3DD.

This Privacy Policy relates to information which is obtained by SwimTayka and for which SwimTayka is the Data Controller.

SwimTayka's Purpose

The objects of SwimTayka are:

- The advancement of health and the saving of lives by the provision of swimming lessons for children and teaching and training in all aspects of water safety.
- The advancement of education in all aspects of clean water especially through water stewardship lessons with children with a view to protecting the environment.

Our supporters help us to achieve this in a variety of ways, primarily by:

- Fundraising, donating money and donating to support our programme of work
- Campaigning for change, through signing petitions, writing letters, and taking part in other campaigning actions



- Volunteering at events and on our programmes

We take active steps to make sure that our supporters are aware of how they can help us achieve our overall purpose.

Why We Hold And Process Supporters' Personal Data

We hold and process supporters' personal data for many reasons:

- To keep a record of donations made and actions taken by our sponsors and our communications with them
- To claim gift aid on donations
- To send our supporters marketing information about our projects, fundraising activities and appeals where we have their consent or are otherwise allowed to
- To fulfil contractual obligations entered into with supporters, e.g. online purchases
- To support volunteers, at events or participating in fundraising events
- To record campaigning actions by supporters
- To encourage community-based fundraising and campaigning
- To ensure we do not send unwanted information to supporters or members of the public who have informed us they do not wish to be contacted

When And Why We Will Send You Personalised Marketing Communications

SwimTayka will only contact you for marketing purposes – for example, keep you up to date on our work, or let you know of ways in which you can support that work – where we have your consent, or we are otherwise allowed to do so.



We will make it easy for you to tell us if you would like to receive marketing communications from us and hear more about our work and how you would like to receive this information (post, email, SMS and phone). We will not send you marketing material if you tell us that you do not wish to receive it.

Where you give us your consent to send marketing information, we will wherever possible let you know how long this consent will last. Unless we have grounds for believing that a more extended period is reasonable and have explained this to you, we will understand your permission to last for 24 months. After this time, for us to continue to update you, we will need your refreshed consent. You can upgrade or withdraw your consent at any time, for individual channels of communication, or for all channels.

Consent lasting more than 24 months

We will generally treat any marketing consent you give us as lasting for 24 months, but will apply the following exceptions (but only where we inform you of this at the time you provide consent):

- Where you have committed to giving us a regular donation (usually monthly). In this situation, and unless you withdraw your consent, we will treat consent as enduring until you cancel your donation, at which point your consent will expire 24 months after the last donation. This is to enable us to keep you up to date with the impact of your gifts and to ask whether alternative means of support would be of interest.
- Where you have notified us that you will be leaving a legacy to SwimTayka. This is a lifetime commitment and although we will provide you with regular opportunities to shape and control your communication from SwimTayka we will treat your consent as ongoing.

Other Circumstances In Which You May Receive Marketing Information From SwimTayka

“Soft opt-in”

Soft opt-in allows organisations to send marketing communications by email and SMS to individuals who have previously purchased similar goods and services, provided they were given the opportunity to opt-out at the time of purchase. We apply a 24-month time limit and only communicate on this basis where you have purchased within this period. We will not use the “soft opt-in” option if you have opted out of receiving email and/or SMS, whether direct to SwimTayka or via the Fundraising Preference Service.



How And When We Collect Information About You:

SwimTayka may collect your personal data in the following circumstances:

When you give it to us DIRECTLY

You may provide us with your personal data directly when you make a donation, sign up for one of our events, purchase products from the SwimTayka online shop, when you communicate with us.

When you give it to us INDIRECTLY

You may provide us with your information indirectly when you sign up for events such as the London Marathon, or contribute to SwimTayka via fundraising sites like Total Giving, Just Giving or Virgin Money Giving. These independent third parties will pass your data to SwimTayka where you have indicated that you wish to support SwimTayka and have given your consent or it is a necessary part of completing a contract with you.

Sometimes your personal data is collected by an organisation working on our behalf (for example a professional fundraising agency), but as they are acting on our behalf, we are the “data controller” and responsible for the security and proper processing of that data.

When you access SwimTayka’s Social Media

We might also obtain your personal data through your use of social media such as Facebook, WhatsApp, Twitter or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

<https://www.facebook.com/policy.php>

<https://twitter.com/en/privacy>

<https://www.whatsapp.com/legal/#privacy-policy>

<https://www.linkedin.com/legal/privacy-policy>

When the information is publicly available

We might also obtain personal data about individuals who may be interested in giving significant gifts to charities or organisations like SwimTayka. In this scenario, SwimTayka may seek to find out more about these individuals, their interests and motivations for giving through publicly available information. This information may include newspaper or other media coverage, open postings on



social media sites such as LinkedIn, and data from Companies House. SwimTayka will not retain publicly available data relating to significant donors without their consent, which will be sought at the earliest practical opportunity.

When we use cookies

Cookies are a useful way for us to understand how supporters use our website. When you visit our website we will collect data from your computer or other devices such as a smartphone or tablet through the use of “cookies”. Cookies are created by your web browser when you visit our website. Every time you go back to the SwimTayka website, your browser will send the cookie file back to the website’s server. They improve your experience of using our site, for example, by remembering your preference settings so that you are presented with information likely to be most relevant to you, and by measuring your use of the website to enable us to continuously improve our site to ensure that it meets your needs. Cookies can also be used to show you relevant SwimTayka content on social media services such as Facebook – these are known as ‘retargeting’ or ‘advertising’ cookies. For information on the types of cookies we use, how we use them and how you can control your cookie preferences, see SwimTayka’s cookie policy.

If you visit our website as an anonymous visitor (e.g. you switch off cookies), SwimTayka may still collect specific information from your browser, such as the IP address (an IP address is a number that can uniquely identify a computer or other internet device).

The SwimTayka website contains hyperlinks to sites owned and operated by other organisations. These include other media organisations (such as the BBC), research organisations and think tanks (such as the Overseas Development Institute), our festival partners (such as Glastonbury), other related charities (such as Save the Children), and SwimTayka affiliates in other countries. These third-party websites have their privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal information you submit or which is collected by cookies while visiting these websites. We cannot accept any responsibility or liability for the privacy practices of such third-party sites and your use of such websites is at your own risk.

What Information Might SwimTayka Collect About You?

We only collect personal data relevant to the type of transactions you have with SwimTayka.

For example, when you contact SwimTayka to make a donation, purchase an item online gift aid scheme, take a campaign action, or sign up to any of SwimTayka’s activities or online content, such as newsletters, competitions, or message boards, or your telephone, email, write to or text SwimTayka, or engage with SwimTayka via social media channels, we may receive and retain personal information about you.



The information we collect is relevant to the type of transaction you are entering into with details such as your name, email address, postal address, telephone or mobile number, bank account details to process donations and whether or not you are a taxpayer so that we can claim Gift Aid.

Sensitive Personal Data

We do not collect “sensitive personal data” about our supporters, e.g. health status, unless there is an apparent reason for doing so – such as participation in a marathon or similar fundraising event where we need this to ensure that we provide appropriate facilities or support to enable you to participate in the event. Clear notices will be presented on application forms for such events so that it is clear what information we need and why we need it.

Should you substantially support SwimTayka, we may provide an account manager to help you tailor your relationship to suit your interests. If this is the case, we may collect sensitive personal data were relevant to our connection, such as your political or religious views. Should you disclose information to us about your health or your family, this may also be recorded, so that we can communicate with you in a considerate and appropriate manner.

All sensitive personal data is stored in a secure database, to which only a limited number of relevant staff have access. It is deleted when no longer relevant, is never shared with third parties, and is available to you at any point should you wish to see it.

How Will SwimTayka Use Your Personal Data?

SwimTayka will use your personal information for the following purposes:

1. **For administrative reasons**, including:

“service administration”, which means that SwimTayka may contact you for reasons related to administering any donations you have made, your tax status concerning Gift Aid if claimed, the completion of commercial or other transactions you have entered into with SwimTayka or the activity or online content you have signed up for;

to confirm receipt of donations (unless you have asked us not to do this), and to say thank you and provide details of how your donation might be used for example if you donate via text you will receive a “bounce back” text message.

in relation to correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means and to contact you about any content you provide;



for internal record keeping to keep a record of your relationship with us;

to keep your data up to date – for instance, we use the Royal Mail's data on postal address changes to ensure that we can maintain contact with you where we believe you are happy to be contacted by post, we also use services which notify us of the recently deceased to avoid any distress that continued communications would cause;

to implement any instructions, you give us to about withdrawing consent to send marketing information or informing us through the Fundraising Preference Service that you do not wish to receive any marketing information;

to use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries.

2. For marketing and fundraising reasons

3. For market research

to invite you to participate in surveys or research about SwimTayka or our work (participation is always voluntary);

to analyse and improve the activities and content offered by the SwimTayka website to provide you with the most user-friendly navigation experience. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

Will SwimTayka Share Your Personal Information With Anyone Else?

We will only use your information within SwimTayka for the purposes for which it was obtained. SwimTayka will not, under any circumstances, share or sell your data with any third party for their marketing purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

SwimTayka's suppliers

We may need to share your information with service providers who help us to deliver our projects, fundraising activities and appeals, for instance through handling responses to our emergency appeals. These "data processors" will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses. We do not allow these organisations to use your data for their purposes or disclose it to other third parties without our consent and we will take all reasonable care to ensure that they keep your data secure.



Facebook and other Social Media Sites

We may also use your email address and phone number to match to your account on Facebook or other social media sites to show you SwimTayka content while using these services. We only do this where you have opted in to marketing emails or phone calls, and we keep your data secure by encrypting it. The third-party retains no data we hold about you.

Besides, we may also use your email address and phone number to link to Facebook or other social media sites to identify other users of these sites whom we believe would be interested in SwimTayka, and we may then show them SwimTayka content. The third-party retains no data we hold about you.

There are two ways to prevent this use of your data, you can either update your preferences at SwimTayka by opting out of the relevant channel of communication, or you can do this via the social media site:

Facebook: <https://www.facebook.com/help/568137493302217>

LinkedIn: <https://www.linkedin.com/help/linkedin/answer/62931>

Twitter: <https://business.twitter.com/en/help/troubleshooting/how-twitter-ads-work.html>

Updating your preferences with SwimTayka will not guarantee that you never see SwimTayka content on social media, since the social media site may select you based on other criteria and without SwimTayka provided your data.

Where legally required

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime, subject to such bodies providing us with a relevant request in writing).

Your data is only processed outside the EU where SwimTayka has verified that appropriate standards and safeguards are in place.

How Long Will SwimTayka Keep Your Personal Information?

We will hold your personal information on our systems for as long as is necessary for the relevant activity, for example, we will keep a record of donations subject to gift aid for at least seven years to comply with HMRC rules.



If you request that we stop sending you marketing materials, we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

Legacy income is vital to the running of the charity. We may keep data you provide to us indefinitely, to carry out legacy administration and efficiently communicate with the families of people leaving us legacies. This also enables us to identify and analyse the source of legacy income we receive.

Where you contribute material to us, e.g. user-generated content or in response to a particular campaign, we will only keep your content for as long as is reasonably required for the purpose(s) for which it was submitted unless otherwise stated at the point of generation.

How To Control What We Send You Or Request We Update Your Personal Information?

The accuracy of your information is essential to us. We want to ensure that we can communicate with you in ways that you are happy with, and to provide you with information that is of interest.

If you wish to change how we communicate with you or update the information we hold, then please contact us:

- email us at changes@SwimTayka.org
- write to us at 11 Jason Close, Swindon, SN25 2NE
- call us on 01172 302030 (Mon-Fri 9am-5pm)

Additionally, you can opt-out of email and SMS separately:

- Email – You can opt-out of marketing emails at any time by clicking the unsubscribe link in any marketing email from SwimTayka.
- SMS – You can also opt-out of SMS messages by texting NOINFO to 70066, this is charged at your standard text rate.

How long will it take for these changes to be effective?



We endeavour to meet the following service levels where supporters request we do not send them marketing information:

- Email – 24 hours from receipt of email
- SMS – 24 hours from receipt of SMS
- Telephone – 24 hours from receipt of a request to opt-out
- Mail – 28 days from receipt of ‘do not mail’ request. This period is more extended than for other channels due to the production times for mailing campaigns, and in most cases, we would expect the change to be effective much more quickly.

Under the Data Protection Act, you have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected (in line with standard guidelines for these requests we charge £10 for information requests and require you to prove your identity with two pieces of approved identification).

Please address requests and questions about this Privacy Policy to the Data Protection Officer, SwimTayka, 11 Jason Close, Swindon, SN25 2NE, UK.

How Swimtayka Keeps Your Data Safe

We ensure that there are appropriate technical controls in place to protect your personal details. For example, our online forms are always encrypted, and our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

We use external companies to collect or process personal data on our behalf. We do thorough checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect on our behalf or have access to. We have a robust partner monitoring framework to ensure these contractual obligations are met.

SwimTayka’s Use Of Cookies

For information on the types of cookies we use, how we use them and how you can control your cookie preferences, see SwimTayka’s cookie policy.



How To Make Complaints About This Policy Or Raise Privacy Concerns

If you would like more information or have any questions about this policy, please contact our supporter relations team by email at changes@swimtayka.org or write to us at Supporter Relations, SwimTayka, 48 The Causeway, Chippenham SN15 3DD, UK. To make a formal complaint about SwimTayka's approach to data protection or raise privacy concerns directly with our data protection team, please contact:

The Data Protection Officer

SwimTayka, 48 The Causeway, Chippenham SN15 3DD

Email: privacy@SwimTayka.org

You also have the right to make a complaint direct to the UK's data protection authority, the Information Commissioner's Office (ICO). The ICO can be contacted at:

<https://ico.org.uk/global/contact-us/>

Concerns can also be logged via the ICO website.

Changes To SwimTayka's Privacy Policy

This Privacy Policy may be updated from time to time, so you may wish to check it each time you submit personal information to SwimTayka. 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 SwimTayka website to submit personal information to SwimTayka. If material changes are made to the Privacy Policy, we will notify you by placing a prominent notice on the site.

Privacy FAQs

Q. Does SwimTayka obtain data from other organisations?

A. SwimTayka receives data from a limited number of Third Parties, including:

- CACI Ltd – who provide summarised data at postcode level (this is typically 16 houses). This includes data such as age, income, house type, and the ages of children in the household. We use this information to decide who to target for our marketing campaigns,



to improve the effectiveness of our fundraising, and to ensure we do not send out marketing information which is unlikely to be of relevance.

- UK changes – which provide data on house movers and the deceased so that we can keep our records up to date and make sure we only send marketing materials where appropriate. This data is only obtained where it is consistent with current data protection laws and SwimTayka’s Fundraising Policy, and where you have given permission for it to be shared for this purpose.
- From the following suppression services;
 - The Mail Preference Service (MPS), which ensures we do not send unsolicited mail to those who have indicated they do not wish to receive it.
 - The Telephone Preference Service (TPS), which ensures we do not telephone people who do not wish to receive unsolicited phone calls.
 - The Fundraising Preference Service (FPS), which ensures we do not send unsolicited marketing material to people who have indicated that they do not wish to hear from SwimTayka.

Q. Does SwimTayka use profiling as part of its marketing campaigns?

A. How we target our marketing campaigns (profiling)

Profiling is a standard technique used in direct marketing and involves analysing data to improve the targeting of communications. SwimTayka uses profiling techniques to help ensure our communications are relevant. Profiling allows us to target our resources effectively which donors consistently tell us is a crucial priority for them. It enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would. The data may have been provided to SwimTayka by our supporters when responding to our marketing campaigns, or when using our website, or social media sites such as Facebook. It may also have been provided by external organisations as described below.

When building a profile, we may analyse geographic, demographic and other information relating to you, as well as your previous responses to our marketing campaigns. We do this to determine whether we believe a particular marketing campaign might be of interest. Some of the data is provided by external organisations and may be provided at an aggregate level (e.g. by postcode). Where it relates to you as an individual, we check that you have provided your express consent to the relevant third party for this use of your data. This helps to maximise the effectiveness of our campaigns and to minimise the wastage that would result from sending marketing information where it is not of interest.