

Privacy Notice

Last updated: 1 September 2026

At a glance

This notice explains how SwimWise Scotland CIC uses personal information when you visit our website, make an enquiry, book an activity, create or use a Soakly account, or take part in a SwimWise activity.

1. Who we are

SwimWise Scotland CIC is the data controller for the personal information covered by this notice. This means we decide how and why that information is used.

- Registered company name: SwimWise Scotland CIC
- Company number: SC886931
- Registered office: Gynack Villa, 1 High Street, Kingussie, Scotland, PH21 1HS
- Email: hello@swimwise.scot
- ICO registration reference: ZC184243

Please use the email address above for privacy questions, requests or concerns.

2. Whose information this notice covers

This notice applies to adults who enquire, book, pay for or take part in our activities, and to parents, carers or other people who book for a child or participant. Where a child is booked into an activity, we receive their information from the parent, carer or other responsible adult who makes or manages the booking.

3. Information we collect

Information you give us

- Contact information, including name, email address, telephone number and, where needed, postal address.
- Booking and account information, including the person responsible for the booking, participant name, date of birth or age, class choices, waiting-list details and attendance information.
- Information in enquiries, emails, forms and other communications with us.
- Swimming progress, skills, awards, registers and teacher comments where these are recorded through our programmes.
- Relevant health, disability, access or support information that you choose to provide so that we can consider safe and inclusive participation.
- Separate choices you make about photography, marketing or other optional activity where we ask for them.

Information created through bookings and participation

- Payments, invoices, refunds and payment-status information. We do not ask you to send full card or bank details to us by email.
- Accident, incident, safeguarding or complaint records where these arise.

Information collected when you use our website

Our website and its providers may collect technical information such as IP address, browser, device and activity needed to operate, secure and improve the website. Optional cookies and similar technologies are addressed in our Cookie Policy and through our cookie-preferences tool.

4. How and why we use information

We use personal information only where there is a lawful reason to do so. The main reasons are set out below.

Enquiries and early contact. We use contact and message information to answer questions and discuss suitable options. Our lawful basis is our legitimate interests in responding to genuine enquiries and running SwimWise responsibly.

Bookings, classes and essential activity communications. We use booking, account, attendance and contact information to provide the activity you have requested, manage waiting lists, communicate changes and administer the customer relationship. Our lawful basis is performance of a contract with the person making the booking, or taking steps at their request before a contract is made.

Payments and financial records. We use payment-status and transaction information to collect fees, issue records, deal with refunds and meet accounting and tax duties. Our lawful bases are performance of contract and legal obligation, where applicable.

Safe and inclusive participation. We use relevant participant, access and support information to plan and deliver activities safely and inclusively. For ordinary personal information, our lawful basis is our legitimate interests in safe, well-managed delivery. For health, disability or other special-category information, we will seek clear explicit consent before recording and using it for this purpose.

Safeguarding, serious incidents and legal claims. We may use or share relevant information where necessary to protect a child or adult at risk, manage a serious incident, meet a legal duty, respond to an insurer or establish, exercise or defend legal claims. The lawful basis will depend on the circumstances.

Website security and essential operation. We use technical information and essential cookies to operate and secure the website. Optional cookies are used only where you have given the required consent.

5. Health, access and support information

Health and disability information needs extra protection under UK data-protection law. Please share only information that is relevant to safe participation or the support you would like us to consider.

When we ask for this information, the adult participant or the parent, carer or other responsible adult making the booking must give clear explicit confirmation that SwimWise may record and use it for safe and inclusive delivery. You can withdraw this consent at any time. However, if we do not have information that is necessary to manage a material safety risk, we may be unable to offer, or may need to adapt, the activity.

In a genuine emergency, we may use or share relevant information to protect someone's vital interests.

6. Our systems and who we share information with

We share information only where necessary for the purposes above. Our current core service providers are:

- **Wix.** Website hosting, website forms, visitor communications and cookie-preferences tools.
- **Soakly.** Booking administration, customer accounts, classes, registers, progress information, waiting lists and customer portal services.
- **Stripe.** Payment processing. Stripe processes payment details through its payment service; SwimWise does not ask customers to email us full card or bank details.
- Our email, IT, accounting, insurance and professional-advice providers where they need information to provide their service.

- Teaching staff and contractors who need relevant information to deliver an activity safely and appropriately.
- Police, local authorities, safeguarding bodies, emergency services, regulators or other organisations where we are legally required or permitted to share information, or where it is necessary to protect someone from serious harm.

We require providers acting for us to protect personal information and use it only for authorised purposes. Some providers may process information outside the UK. Where this happens, we use safeguards recognised by UK data-protection law, such as an adequacy regulation or an approved transfer mechanism. Please contact us if you would like further information about a particular provider or transfer.

7. How long we keep information

We keep information only for as long as it is needed for the purpose for which it was collected, taking account of legal, financial, insurance, safeguarding and limitation-period requirements. We review information regularly and securely delete or anonymise it when it is no longer needed.

Enquiries that do not become a booking. Normally up to 12 months after our last meaningful contact.

Booking, account, attendance and progress information. For the period of the booking relationship and normally up to 2 years after the final activity, unless a longer period is needed for a complaint, claim, safeguarding matter or another legal reason.

Payment, invoice and accounting records. Normally for 6 years after the end of the financial year to which they relate.

Health, access and support information. For the period it is needed to support safe participation and normally up to 12 months after the final activity, unless a longer period is necessary for a related incident, claim or safeguarding matter.

Accident, incident, complaint and safeguarding records. For as long as required by our relevant policies, insurance requirements, statutory limitation periods and safeguarding record-retention requirements. These records may need to be kept substantially longer than routine booking records.

Optional marketing or photography consent records. Until consent is withdrawn, the activity ends, or the information is no longer needed to evidence and manage the choice.

8. Your rights

Depending on the reason we use your information, you may have the right to:

- ask for access to the personal information we hold about you;
- ask us to correct inaccurate or incomplete information;
- ask us to erase information in certain circumstances;
- ask us to restrict how we use information in certain circumstances;
- object to processing based on legitimate interests;
- receive information you have provided to us in a portable format in certain circumstances;
- withdraw consent at any time, where we rely on consent; and
- complain to the Information Commissioner's Office (ICO).

To make a request, email hello@swimwise.scot. We may ask for information to confirm your identity before responding. You can complain to the ICO at ico.org.uk/make-a-complaint if you are unhappy with how we handle your information.

9. Automated decision-making

SwimWise does not make decisions about participants solely by automated means. We use systems such as Soakly to help manage bookings, payments, waiting lists and class information, but decisions about class placement, participation and support are made by a member of the SwimWise team.

10. Cookies

Our Cookie Policy explains the cookies and similar technologies used on the website, including how to change your cookie choices. Optional cookies are not used unless you give the required consent through our cookie-preferences tool.

11. Changes to this notice

We may update this notice when our services, systems or legal responsibilities change. The latest version will be available on our website, with the updated date shown at the top.

12. Contact

For privacy questions, requests or concerns, contact SwimWise Scotland CIC at hello@swimwise.scot.