

GDPR Data Protection Policy: RLSS National Pool Lifeguard Qualification (NPLQ) Data

Effective Date: July 5, 2025

1. Introduction

This policy outlines how Making Waves Limited collects, processes, stores, and protects personal data related to individuals undertaking the Royal Life Saving Society (RLSS) National Pool Lifeguard Qualification (NPLQ). We are committed to complying with the General Data Protection Regulation (GDPR) (EU) 2016/679 and the Data Protection Act 2018 (UK), ensuring the privacy and security of all personal data.

2. Data Controller

The data controller for the personal data collected for the NPLQ is:

Making Waves Limited

Playsport,

Stewartfield Way,

East Kilbride

G74 4GT

Nicola@makingwavesswimming.co.uk

ICO Registration Number: ZB187198

3. Principles of Data Processing

We adhere to the following GDPR principles when processing NPLQ-related personal data:

- * **Lawfulness, Fairness, and Transparency:** Data is processed lawfully, fairly, and in a transparent manner.

- * **Purpose Limitation:** Data is collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

- * **Data Minimisation:** Data collected is adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

- * **Accuracy:** Personal data is accurate and, where necessary, kept up to date.

- * **Storage Limitation:** Data is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

* Integrity and Confidentiality (Security): Data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

4. Types of Data Collected

We may collect the following types of personal data from individuals undertaking the NPLQ:

- * Identity Data: Full name, date of birth, gender.
- * Contact Data: Postal address, email address, telephone number.
- * Qualification Data: Previous qualifications (e.g., swim instructor certifications), NPLQ assessment results, certificate numbers, renewal dates.
- * Health Data (Special Category Data): Relevant medical conditions or disabilities that may impact participation in the NPLQ (collected with explicit consent where required, and strictly for safety and reasonable adjustment purposes).
- * Payment Data: Payment information for course fees (processed securely by third-party payment processors where applicable, and we do not store full payment card details).
- * Emergency Contact Data: Name and contact details of an emergency contact person.
- * Photographic/Video Data: Where necessary for identification, assessment, or promotional purposes (with explicit consent).

5. Lawful Basis for Processing

We rely on the following lawful bases for processing personal data for the NPLQ:

- * Contractual Necessity: To fulfil our contractual obligations in providing the NPLQ course and certification.
- * Legal Obligation: To comply with legal requirements related to health and safety, safeguarding, and record-keeping.
- * Legitimate Interests: For the effective administration of the NPLQ, including course management, communication, and quality assurance, provided these interests do not override the individual's fundamental rights and freedoms.
- * Consent: For specific purposes, such as processing special category data (e.g., health information) or for marketing communications, where explicit consent will be obtained. Individuals have the right to withdraw consent at any time.

6. Purposes of Data Processing

Personal data is collected and processed for the following purposes:

- * To register individuals for the NPLQ course.
- * To administer and deliver the NPLQ training and assessment.
- * To verify identity and eligibility for the qualification.
- * To record and issue NPLQ certificates.
- * To communicate important information regarding the course, results, and renewals.
- * To ensure the safety and well-being of participants during training.
- * To comply with RLSS UK requirements for qualification delivery and accreditation.
- * To handle inquiries, complaints, and appeals.
- * To maintain accurate records for audit and compliance purposes.
- * For internal statistical analysis and improvement of course delivery.
- * For marketing and promotional activities (where explicit consent has been given).

7. Data Sharing

Personal data may be shared with the following third parties, only where necessary and with appropriate safeguards in place:

- * Royal Life Saving Society UK (RLSS UK): For registration, certification, and verification of NPLQ qualifications.
- * RLSS UK Assessors/Trainers: For the purpose of delivering and assessing the NPLQ.
- * Venues/Facilities: Where the NPLQ course is being held, for operational purposes (e.g., participant lists for entry).
- * Third-Party Service Providers: Such as IT support, payment processors, or online learning platforms, who process data on our behalf under strict contractual agreements.
- * Legal and Regulatory Authorities: When legally required to do so.

We will not sell, rent, or lease your personal data to third parties.

8. Data Retention

We retain personal data for the NPLQ only for as long as necessary to fulfil the purposes for which it was collected, including for satisfying any legal, accounting, or reporting requirements.

Typically, NPLQ certification data (e.g., name, date of birth, certificate number, qualification date) will be retained for [e.g., "the lifetime of the qualification plus a reasonable period for renewal and verification purposes," or "7 years after the last qualification expiry"] to facilitate verification and renewal of qualifications. Other data will be retained in accordance with our internal data retention schedule, which is available upon request.

9. Data Security

We have implemented appropriate technical and organisational measures to protect personal data from unauthorised access, unlawful processing, accidental loss, destruction, or damage. These measures include:

- * Access controls and password protection for electronic data.
- * Physical security measures for paper records.
- * Data encryption where appropriate.
- * Regular security assessments and staff training.
- * Secure disposal of data when no longer required.

10. International Data Transfers

We generally store and process personal data within the UK/EEA. If it becomes necessary to transfer personal data outside the UK/EEA, we will ensure appropriate safeguards are in place, such as relying on adequacy decisions, standard contractual clauses, or other legally recognised mechanisms, to ensure the data receives an equivalent level of protection.

11. Your Rights as a Data Subject

Under GDPR, individuals have the following rights regarding their personal data:

- * Right to be Informed: To know how your data is being used.
- * Right of Access: To request a copy of the personal data we hold about you.
- * Right to Rectification: To request correction of inaccurate or incomplete data.
- * Right to Erasure (Right to be Forgotten): To request deletion of your personal data in certain circumstances.
- * Right to Restriction of Processing: To request the limitation of processing your data in certain circumstances.
- * Right to Data Portability: To receive your personal data in a structured, commonly used, and machine-readable format and to transmit it to another controller.

* Right to Object: To object to the processing of your data in certain circumstances (e.g., for direct marketing).

* Rights in Relation to Automated Decision Making and Profiling: To not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

To exercise any of these rights, please contact us using the details in Section 2. We will respond to your request within one month.

12. Complaints

If you have concerns about how we are handling your personal data, please contact us in the first instance. If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's independent authority for upholding information rights.

Information Commissioner's Office (ICO)

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: www.ico.org.uk

13. Changes to this Policy

We may update this policy from time to time to reflect changes in our data processing practices or legal requirements. Any updates will be published on our website and, where appropriate, communicated directly to data subjects.

Disclaimer: This is a template GDPR policy and should be adapted to your specific organisational structure, data processing activities, and legal advice. It is not a substitute for legal counsel. You should consult with a legal professional to ensure full compliance with GDPR and relevant national data protection laws.