



# Abingdon Dolphins

## Abingdon Dolphins - Data Retention & Right to Erasure

The table below shows the type of personal data collected by Abingdon Dolphins Swim School, the format in which it is stored, the level of security and our retention/deletion policy;

Data Collection point	Description of data	Format	Level of security	Retention/Deletion policy
Parent and Swimmer Data	Nominal and contact data Medical information	Electronic database	Secure server. Password, username & memorable info required	Records deleted after 2yrs
Swimsoft records	Data input for register population	Electronic database	Secure server. Password, username & memorable info required	Records deleted after 2yrs
Employee records	Nominal, contact and banking data	Paper	Locked location	Shredded 2yrs after leaving employment
Emails	Can include personal, contact, banking & medical details	Electronic	Secure server. Password protected	Deleted after 2yrs from receipt
Verbal	Can include personal, contact, banking & medical details	Transferred to appropriate format depending on nature of data & reason for disclosure	N/A	In accordance with storage format.



# Abingdon Dolphins

Abingdon Dolphins Swim School acknowledges that every individual has the right to have their data erased where;

- the personal data is no longer necessary for the purpose which it was originally collected or processed for
- we are relying on consent as our lawful basis for holding the data, and the individual withdraws their consent
- we are relying on legitimate interests as our basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest to continue this processing;
- we are processing the personal data for direct marketing purposes and the individual objects to that processing
- we have processed the personal data unlawfully (ie in breach of the lawfulness requirement of the 1st principle)
- we have to do it to comply with a legal obligation
- we have processed the personal data to offer information society services to a child.

Abingdon Dolphins Swim School will;

- Accept a request to have personal data erased in any format including verbal requests
- Respond to a request to have personal data erased within 30 days
- Notify the individual within the 30 day period when/if the data has been erased
- Notify the individual within the 30 day period if we refuse to comply with the request with our justification for not complying