



Swimmattix Swim School (PTY) LTD Privacy Policy

1. Privacy at Swimmattix Swim school 1.1 Our Privacy Commitment

We recognise that providing personal information is an act of trust, which we take very seriously.

The Protection of Personal Information Act 4 of 2013 requires that we keep plans and process in place on how we process, store and share personal information. We respect our clients' right to privacy and endeavour to collect and use information minimally, transparently, and for the purpose for which it was collected. This Policy and supporting documents is written in easily understandable language so that is practical in usable to a wide audience in the business.

We are committed to protecting your privacy and for that reason we will only collect, use, disclose, store and otherwise handle your personal and sensitive information that is necessary for us to deliver goods and services to you or to employ you.

1.2 Our Privacy Statement

Due to the nature of our business it may be necessary to obtain personal information about you.

We will not collect or use any information you provide in an inappropriate manner.

We will only ask for and use personal information that we reasonably need to conduct our business and we will take all reasonable steps to protect your personal information from misuse, loss, unauthorised access or inappropriate disclosure.

This current policy came into effect on 22 June, 2021. We may need to update it over time and will post the updated version on our website when updates occur.

1.3 What information we collect

We offer products and services inline with our business as a swim school. We also offer employment and manage numerous facilities directly.

The information that we collect about you will vary depending on the way in which you interact with our businesses; however, it is mostly information that is provided by you, such as your full name, ID number, date of birth, contact details (including address, email address and any phone or mobile numbers), occupation/employment details, emergency contact details and financial information in order to bill you every month,

Depending on how you are using our products and services we may also collect more detailed information such as information about how you use our products and services:

- Details of guardian/s for minors;
- Details of participation in membership programs;

- Health information when accessing our venues or services where health status may be important;
- History of preferences, interests and behaviour relating to transactions, products, services and activity with our digital services;
- Your computer IP address when visiting any of our websites;
- Your image if required for membership identification;
- Records of your communications and interactions with us, such as details of your previous dealings with us or any of the Swimmattix-managed facilities;
- If you apply for a job at Swimmattix details about your education, employment history, membership of professional associations, referees, Working with Children status and next of kin.

We may collect some forms of sensitive information. This is most likely to be health information or information related to employment such as criminal history and professional associations.

Where we collect sensitive information from you, we will only do so with your consent. This information will only be used for the purpose it was collected or, in exceptional circumstances, to lessen a serious threat to a person's health or safety.

You are not obliged to provide personal or sensitive information to us; however, we may not be able to provide goods or services to you if you don't.

If you provide us with another person's personal information, such as for the purchase of a gift voucher, you must have their consent to do so and we rely on you to have informed those individuals that you are providing their personal information to us and have advised them about this statement.

1.4 How we collect your information

We will never ask you to provide or verify your personal or sensitive information by clicking on a link, such as that of a member portal, and we will never ask you to email credit card information. If you do receive such a request, we ask that you report it to us immediately.

We will collect your information in a variety of ways:

You provide it to us or one of our service when you interact with us to purchase our goods, use our services or to seek employment. This may occur in person, by phone, online or by completing agreements and application documentation and could take the form of:

- online registration
- purchasing stock from our Swimmattix Shops,
- applying for or maintaining your membership at one of our facilities,
- completing a feedback form or survey,
- posting on our official social media pages,
- through payments you make,
- applying for a job

We collect information about how you interact with us, such as by email and our websites. This may occur via the use of cookies or other technology to identify your unique web browser when interacting with us online.

We also obtain information from outside sources like companies running competitions on our behalf and public information, such as your public posts on our official social-media pages.

We understand that you may not wish for us to collect your personal or sensitive information; however, we may not be able to provide goods or services to you if we don't.

1.5 How and where we keep your information

The exact location where your information is stored or processed will depend on the part of our business that has collected it and the goods and services we provide you.

Generally, we hold your personal information electronically, at our premises and at facilities owned and operated by our service providers.

Your information is only accessed on a 'need to know' basis and this forms part of the controls we apply to protecting your personal information.

We use a combination of physical and technology controls, and internal procedures to keep your information safe. These controls include Tier-3 data centres, secured offices, locked files, password-protected computing, monitored firewalls, anti-virus software and encryption communication with our websites, membership portal (Jackrabbit) and apps.

Where no agreements, other laws or terms in this policy apply, a record of personal information will be kept for one year after the information was finished being processed, including usage for the specific purpose for which the information was collected originally.

1.6 Children's Privacy

Swimmattix Swim School collect personal information regarding children under 18.

The information is collected with consent directly from the data subject's parents, or you have the parents "authorize" the data subject's consent. No processing of personal data may be performed, before one of these two options has been played out.

Parents consent is collected by:

- Enrolling online for our swim program
- Direct email to our Head Offices.

1.7 How we use your information

We need to use your information to provide you with our products and services or to employ you. This may also extend to:

- Assisting with feedback or queries you may have;
- Processing bookings or applications that you submit;
- Conducting and administering swim memberships;
- Promoting and marketing, including direct marketing, for current and future businesses we conduct;
- Informing you of the products and services we offer;
- Processing and fulfilling gift vouchers;
- Surveys, direct marketing, promotions and competitions;
- Assessing applications for employment and ongoing management as an employee;
- Accounting purposes, such as billing of services, products and memberships;
- Evaluation and improvement of the effectiveness of our website and official social media pages;
- Collecting diagnostic and statistical information relating to our IT systems;
- Facilitating our internal business operations, including the fulfilment of legal requirements and assessing new and/or improved services.

1.8 How we share your information

The extent to which we share your information will depend on which of our businesses collected it and which goods and services we provide you.

We may exchange your personal information with other parties who provide services to us. This may include sharing with:

- Insurers and work cover in the case of a health-and-safety incident;
- Any other party with which we are legally required to share.

We will not sell your information to marketing bodies.

1.9 Direct Marketing Communications

We may communicate with you using email, SMS, and other channels (sometimes through automated means) as part of our effort to market our products or services, administer or improve our products or services, or for other reasons stated in this Privacy Notice. You have an opportunity to withdraw consent to receive such direct marketing communications, as permitted by law.

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt out by using the unsubscribe link in the email communication you may have received or by submitting a request through info@swimmattix.com. Further, you may express your communication preferences by:

- Noting your preferences at the time you registering with us online.
- Logging into your Parent Portal settings and updating your preferences or contacting us [1.13 How you can contact us](#).

Please note that you may continue to receive non-marketing communications as may be required to maintain your relationship with Swimmattix Swim School.

1.10 How you can access or correct your personal information

We believe it is important to ensure that the personal information we hold about you is accurate and up to date. The accuracy of the information that we hold depends to a large extent on the information that you provide, so it is important that you make sure the personal information we hold about you is accurate, up-to-date and complete.

Your personal information can be updated via our Parent Portal / Swimmattix App or you can request your information to be updated by contacting the Swimmattix Office. To make such a request, see [1.13 How you can contact us](#).

You also have a right to request a copy of the information that we hold about you. There is no charge to submit a request or to correct this information. To make such a request, see [1.13 How you can contact us](#).

1.11 Personal Information Transfers outside South Africa

Due to the pervasive and widespread use of cloud technology and the disappearance of national borders in the broader context of the digital age we live in it is accepted that Personal Information of Data Subjects will almost always be transferred internationally. It is not always possible to pinpoint exactly in which country the cloud service is hosted as this may change from time to time as data centres operate internationally in several countries. It may well be the case that Personal Information is transferred to multiple countries.

We may use third-party service providers to help us deliver certain services, and it may result in the processing of personal information in data centres and locations outside of South Africa. For example, these service providers may provide us with essential information technology or tools we use to run our business. We may permit these service providers to process our business information and/or your personal information. We do not permit these service providers to process any personal information outside of a contract, and these service providers may collect personal information on our behalf. Our third-party service providers are required to comply fully with this Privacy Notice.

1.12 How you can make a privacy complaint

If you have any disputes or complaints about the way in which your personal information has been handled by us, please contact us see *1.13 How you can contact us*.

We will investigate any dispute or complaint and respond to you within a reasonable time. If you still consider that your privacy complaint has not been resolved, you may then take your complaint to the Information Regular (South Africa) on their complaints email address: complaints.IR@justice.gov.za

1.13 How you can contact us

If you have any questions about this Privacy Statement, our management of your information or if you would like a copy of this statement, please contact us on the details below:

Swimmattix Head Office
7 Libertas Road, Pinelands, 7405
Call: 021 827 9768
Email hello@swimmattix.com

1.14 Changes to this Statement

This Privacy Statement came into effect on June 22, 2021. Although most changes are likely to be minor, we may amend or update this Privacy Statement to ensure that we maintain the highest standards. If we do, we will post the updated version on our websites.

1.15 Your privacy rights

If you are a South African resident, South Africa law may provide you with certain rights with regard to your personal information under the Protection of Personal Information Act (“POPIA”) and Promotion of Access to Information Act (“PAIA”). as well as the Consumer Protection Act Throughout this Privacy Notice you will find the information required by POPIA regarding the categories of personal information collected from you; the purposes for which we use personal information, and the categories of third parties your data may be shared with. This information is current as of the date of the Notice and is applicable in the 12 months preceding the effective date of the Notice.

1.16 POPI awareness

The responsible Party conducts POPI awareness sessions with all staff or other consultants or contractors via awareness sessions. All previously mentioned persons will be required to have completed the POPI awareness training.

From time to time more in-depth POPI awareness sessions may be held with the Information Officers

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