



International Halliwick Association

Seated in Denmark

## Privacy Policy

### WE TAKE YOUR DATA PROTECTION SERIOUSLY

**The IHA processes personal data, therefore, we have developed this policy to inform you about what data we collect, how we use it and how you can control it to ensure fairness and transparency.**

#### 1. Data controller and data processor

The International Halliwick Association (IHA) seated in Denmark, is an association of Individuals, National Associations and Recognized Groups that practice and advocate the use of the Halliwick® Concept.

The IHA's purpose is to uphold the Halliwick® Concept's basic idea and where possible, to raise the standard of teaching the Halliwick concept through the following measures:

The objects of the Association (hereinafter “the objects”) shall be to:

- (a) maintain the ideology of the Halliwick Concept as created by James McMillan and to develop the Halliwick Concept in accordance (where appropriate) with scientific advances;
- (b) promote the availability and accessibility of the Association for each member worldwide;
- (c) provide training and instruction and to maintain quality standards in such training and instruction in order to raise professional levels of same;
- (d) promote the continuance and improvement of Halliwick courses;
- (e) to organise meetings and educational programmes which advance the objects of the Association on a regular basis;
- (f) facilitate the co-operation of members internationally and the co-operation of members with other national or international organisations to further and improve the exchange of ideas concerning the Halliwick Concept;
- (g) stimulate research into the theoretical background and therapeutic and functional effects of the Halliwick Concept; in furtherance of this object the Association will *inter alia*:
  - (i) co-operate with other such national associations being interested in the objects of this association;
  - (ii) encourage the development and maintenance of national associations and individuals;
  - (iii) act both as a forum for the exchange of ideas, knowledge, skills and experience and act as a source of information;
  - (iv) hold from time to time meetings and conferences at international level and encourage the same at the national level.
  - (v) inform the public about the activities of the Association within its field of interest;
  - (vi) invite (as appropriate) representatives of the media to meetings and conferences and other activity;
  - (vii) keep accurate records of such meetings;
  - (viii) promote publications by the Association.

The IHA is a data controller and data processor, and we ensure that your personal data is processed in accordance with Danish Law.:

**The Danish Data Protection ACT**

<https://www.datatilsynet.dk/media/6894/danish-data-protection-act.pdf>

## General Data Protection Regulation

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN>

We only process personal information for specific legitimate purposes that help the organisation to perform its duties. We will only process personal information that is relevant and necessary for the purposes stated below. We will delete your information when it is no longer needed.

The IHA uses a management system with the company: [foreningsadministrator.dk](https://foreningsadministrator.dk). This system contains a membership database and an email system for sending out subscriptions and invoices.

In addition, enrollments for courses, conferences, seminars, Galas and other events organised by the IHA are emailed to the encrypted email: [info@halliwick.org](mailto:info@halliwick.org) whereby the IHA can receive and process sensitive personal information (special categories of personal data).

Thus, the company [foreningsadministrator.dk](https://foreningsadministrator.dk) is also a data processor. You can read more about their privacy policy (it is only in Danish) and the contract basis here:

<https://www.foreningsadministrator.dk/compliance>

The IHA's website, [www.halliwick.org](http://www.halliwick.org), is built using software developed by [www.wordpress.org](https://www.wordpress.org). They have access to the IHA's information when setting up the software and developing the site. A link to their privacy policy can be read here <https://wordpress.org/about/privacy/>. However, they do not collect any information about visitors to the website as they are not the hosts. Hence, they are neither a data processor nor a data controller as they do not store any data.

The website is hosted by Amazon Web Services (AWS amazon). Hence they are a data processor. Here is a link to their data privacy page <https://aws.amazon.com/compliance/data-privacy/> and GDPR compliance section <https://aws.amazon.com/compliance/gdpr-center/>

The email address [info@halliwick.org](mailto:info@halliwick.org) is on the Amazon work mail platform, which is a part of the AWS amazon company. Therefore, it has the same privacy policy and GDPR compliance, see links above. This email address is also encrypted which protects the information within emails from being stolen by hackers.

All personal information that you provide to us is processed and stored on secure, password and firewall-protected servers.

## 2. Contact information:

### International Halliwick Association

c/o Treasurer: Bodil Føns Knudsen  
Jacobsvej 22  
3310 Ølsted  
Denmark

Central Business Registration no: 39295709

website: [www.halliwick.org](http://www.halliwick.org)

email: [info@halliwick.org](mailto:info@halliwick.org)

The data controllers are the IHA's Executive Committee (Exec).

The IHA's Exec members' information can be found on the committee and contact pages on the website at <https://halliwick.org/the-ih/executive-committee/> and can be contacted by emailing [info@halliwick.org](mailto:info@halliwick.org).

### 3. The purposes and legal basis for processing your personal data

We process your personal information for specific purposes when we have a legitimate reason.

Legal reasons for processing include:

- The association's justice of interests (legitimate) in processing your information [OBJ:OBJ]
- That it is necessary to fulfil a contract with you.
- Processing according to legal requirements.
- Processing with consent.

#### **We only process personal data based on legitimate interests:**

To the extent that we process your personal data based on the balance of individual interests, this processing will be motivated solely by a justice of interests (legitimate) that we collect and retain in connection with the fulfilment of IHA's Mutual Agreement, participants in Halliwick courses, conferences, seminars, Galas and other events and who lectures.

We process your data based on Article 6(1) of the General Data Protection Regulation in the following circumstances:

- Application for membership
- The handling of your membership rights in accordance with the IHA Constitution.
- The fulfilment of membership obligations, including the collection of payments.
- Honorary Members of IHA.
- The use of situational photos taken by the IHA for use in the newsletter, at the website, publications, books, journals and instructional and teaching material. The term situational photos is in accordance with the Datatilsynet's definition of situational photos.
- Announcement as a participant and/or a lecturer on courses, conferences, seminars, Galas and other events organized by IHA
- The processing of information necessary for the participation in Halliwick conferences, seminars, Galas and other events organized by IHA. This can be as an Emeritus lecturer, senior lecturer, lecturer, trainee lecturer, or as an Executive member (cf. the Personal Data Regulation Art. 6 (1) a). These roles must be in compliance with the legal requirements and administration of your relationship with the IHA.
- Photo and video recordings can be taken at IHA events, however, they can only be used for teaching purposes, website and Facebook information. If any material is published, there must be written consent that adheres to the relative regulations.
- Educates you and/or acts as International Halliwick® Association's Recognized Trainee Lecturer, Lecturer, Senior Lecturer, Emeritus Lecturer, Executive Committee members, Education & Research Committee members and Gala Subcommittee members.
- The processing of information needed to evaluate and approve trainees.
- The storing of information needed to document the following; International Halliwick® Association's members, Recognized Trainees Lecturers, Lecturers, Senior Lecturers or Emeritus Halliwick Lecturers.
- The processing and retaining of information necessary to document that the Executive Committee may sign documents as the IHA and must fulfil their obligations such as following the standard orders as outlined in our records.
- The processing and storing of information needed, inter alia, for fees, payments and the reimbursement of different expenses.

#### **4. Categories of personal data:**

##### **4.1. Member information, including Honorary Members.**

Registration and contact information; name, address, skype nickname, enrollment date, phone number and email address.

Possibly any affiliation with national associations or recognized groups.

##### **4.2. Participants**

Personal data which is stored on a higher level of protection:

Payment information (by own payment).

Specific information such as dietary, cultural, mobility requirements, which will be deleted after the course

Portrait pictures (see paragraph 7 for consent).

##### **4.3. International Halliwick® Association's Recognized Trainee Lecturers, Lecturers, Senior Lecturers and Emeritus Halliwick Lecturers.**

General information:

Contact information such as name, address, skype nick, phone number and e-mail address.

Personal data added to a higher level of protection:

Payment information (for payment of fees and other different expenses).

Information about trainee lecturers continuous education logbooks and relevant attachments.

Overview and improvement of experiences and competences, including continuing education and training.

##### **4.4. Members of the IHA's Committees and Subcommittees.**

Contact information; name, address, skype nick, phone number and email address.

Affiliation with the national association and recognized group.

Personal data added to a higher level of protection:

Payment information (for payment of fees and other different expenses).

#### **5. Using photos and videos**

Photos and videos are considered personal data. Therefore, publishing this in any form is considered to be processing sensitive data.

Photos that may be published without consent are defined as photos where an activity or situation is the true purpose of the photo. Generally, photos with news value, such as photos from a swimming event and with trophy awards, can be published without written consent.

Also, photos of a group activity or teaching style, where there is not a single person, but the teaching is in focus can be specifically described as an Activity-photo, can be published without written consent.

Participants should in general have the possibility to say NO for publishing any kind of photos with her or he being a part of the photo. Organizers of courses, swimming galas or events need to consider the possibility to have consented at the applications form for the use of photos, which in general can be published without written consent.

A crucial criterion to assess whether it is possible to publish a photograph is that the photographed person may not reasonably feel exposed, exploited or violated in any way. For instance, for marketing or other commercial purposes. In other words, the photos must be harmless from a normal point of view.

The IHA is aware of the need to interpret a situation photo involving a swimmer/instructor/teacher with visible physical impairment or other visual impressions that may enable the unambiguous identification or identification of that person as a particular individual. This can cause the photo to change the character and therefore requires a specific written consent

Photos, which are photos whose purpose is to depict one or more specific persons, are never used in newsletters, on the website or Facebook, for course material or otherwise without specific written consent.

Videos used in addition to the specific course that the involved swimmers, students and lecturers have permitted (sections 4.3 and 4.4) require that those involved have knowledge of the content of the video and that written consent has been given for publication on other courses, website or Facebook. Publication at conferences or events can only be given by specific written consent.

Please be aware that the IHA may lose control of data in print, on the Internet or on social media where the photos or videos may have been shared with third parties.

We always follow the rules on the use of photos and videos on the Danish Data Protection Agency's website (Datatilsynet).

## **6. Collecting information:**

We will usually collect your information from you personally.

When registering for events organized by the IHA this information could be gathered from the national association, recognized group, swimming clubs or other institutions.

Photos and videos from courses and other IHA's activities and events.

## **7. Consent**

Most often, our processing of your personal data will be based on a legal basis other than consent. We, therefore, obtain your consent only, in cases where it is necessary to process your personal data for the purposes described above.

If we obtain your consent, it is voluntary if you will consent and you can withdraw it at any time by notifying us. When using video and visual material whilst teaching, we will always obtain your consent or your guardians. For photos of children, we obtain their parents or guardians consent. For photos of young people between the ages of 15 and 18, we obtain the consent of both the young person and a parent/guardian. The starting point for children and young people is for fixed-term permission.

## **8. Disclosure of your personal information**

- We do not disclose personal information for marketing purposes.
- You specifically authorize the use of photos and videos for different teaching purposes and information on website and Facebook. This material is not used beyond what is agreed in the statement of consent and is not disclosed to any third party without specific consent.

## **9. Third-Party Websites**

The website may contain links to other websites. We are not responsible for third party websites privacy policy or their practices regarding personal data.

## 10. Storing your personal data

We have different processing purposes and retention periods depending on whether we process your personal data as a member of the Association, the Executive Committee, the Education & Research Committee or the Gala Committee.

### 10.1. Members:

In all cases, parts of your personal data are stored in accordance with the Danish Law for Accounting, the Bookkeeping Act – BKA (Bogføringslovens § 10, stk. 1) for 5+ years from the end of the financial year to which the material relates to and after approval at the General Meeting. Then they are deleted.

### 10.2. Course participants:

We will keep your personal data for the period starting from the end of your course and in accordance with the following criteria:

- For administrative reasons, if your name is on the Invoice we keep your general information in accordance with the Bookkeeping Act - BKA (Bogføringslovens § 10, stk. 1) for 5+ years from the end of the financial year to which the material relates and after approval at the General Meeting. Then they are deleted.

### 10.3. Lecturers, Executive Committee, Education & Research Committee and Gala Committees members:

We will keep parts of your personal data for a period of time from the termination of your work and in accordance with the following criteria:

- Attachments/, Enclosure/vouchers including e.g. fee supplement, in accordance with Danish Law for Accounting (Bookkeeping Act - BKA) / Bogføringslovens § 10, stk. 1: for 5+ years from the end of the financial year to which the material relates and after approval at the connected General Meeting.
- List of names and relevant years of IHA recognized: Lecturers, Senior Lecturers, Honorary members, Committees members and Emeritus Halliwick Lecturers are kept on a continuous basis.
- List of Trainee Lecturers and their documentation of the learning process is stored on an external encrypted hard drive with no internet access on a continuous basis and kept by the members of the Education & Research Committee.
- Preservation of name information with historical value.

## 11. Updating personal data

As the IHA's operations and services depend on your data being accurate and up-to-date, we ask you to ensure that your data is correct and that you notify us if there should be any changes made. You can use the contact information above to notify us of your changes.

## 12. Security

The IHA protects your personal data and has internal information security rules that contain instructions and measures to protect this data from being destroyed, lost or altered, from unauthorized disclosure and against unauthorized access or access to it.

### **13. Your rights**

You have the following rights under the Personal Data Regulation when we process your data:

- The right to be informed about the processing of your data
- The right to access your personal data
- The right of rectification (correction of mistakes)
- The right to erase (right to be forgotten) under certain circumstances
- The right to restrict data processing
- The right to data portability (disclosure of data in a commonly used format)
- The right to object

You can use your rights, including any objection to our processing your data by contacting us. You will find our contact information at the top.

For example, if you contact us with a request to have your personal data corrected or deleted, we will investigate whether the conditions are met and if so, make changes or deletions as soon as possible.

Please be aware that the IHA may lose control of data in print, on the Internet or on social media, where photos or videos may have been shared with third parties.

You can read more about your rights in the Data Inspectorate's guide and the rights of the data subjects, which you can find at [www.datatilsynet.dk](http://www.datatilsynet.dk) / <https://www.datatilsynet.dk/english>

### **14. Complaints to the Datatilsynet (The Danish Data Protection Agency)**

If you are dissatisfied with our processing of your personal data, you should always first contact us as the Data controller of the Association.

You have the right to file a complaint to the Danish Data Protection Authorities if you are dissatisfied with the way we process your personal information.

You can find the Datatilsynet's contact information at [www.datatilsynet.dk](http://www.datatilsynet.dk) / <https://www.datatilsynet.dk/english/>

### **15. Privacy Policy Review**

We may update this Privacy Policy from time to time with the new version being published on our website. You should check this page occasionally to make sure you are happy with any changes that are made. In the event of changes, the date at the bottom of the Privacy Policy will be updated. In the case of any significant changes, we will inform you about this through our website or/and by an e-mail.

**November 23<sup>th</sup>, 2020**  
**IHA's Executive Committee**