

Privacy Policy – 6 May 2021

marathonswims.com (the “Website”) is owned by the Swimathon Foundation (registered charity number 1123870 and company number 4684234). It is operated by Participation Sport Ltd (company number: 10581306) (“we”, “our” or “us”). We are committed to protecting the privacy of our users. This privacy policy (“Privacy Policy”) is intended to inform you how we gather, define, and use your personal information, such as your name, email address, address and other contact details (“Personal Information”). Please use this Privacy Policy to help you decide whether and how you wish to use our site and our products and services. Please take a moment to read it carefully.

All your Personal Information shall be used in accordance with the applicable English law. If you want to know what information we collect and hold about you, please write to us at Participation Sport Ltd, c/o Aston Shaw, 51-59 Rose Lane, Norwich, NR1 1BY, email us on info@participationsport.com or call us on 07974240762.

Participation Sport Ltd is the data controller of your Personal Information for the purpose of the Act. This website is hosted by Wix and the registration by Active Networks. The data (Active Networks – registration platform) is located in a secure datacentre in the US.

What information do we collect?

When you visit our Website, or contact us by email or telephone, we may collect the following information:

- Personal Information that you choose to share with us when you register for Marathon Swims;
- Sensitive Personal Information that you choose to share with us if you provide us with medical details when you are deciding whether to take part in Marathon Swims;
- If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses;
- Information about the way our Website has been used by you and others – collected on an aggregate basis; and
- Your IP address and other information (e.g. the browser you are using) may be collected when you interact with our Website e.g. when you subscribe to our emails.

It is important that all the Personal and Sensitive Personal Information you give us when you register as a user is correct and accurate. This includes, by way of example only, ensuring that we have your correct contact (including email) details at all times.

Once we have received your Personal Information we will use strict procedures and security features to prevent unauthorised access.

How do we use the information you provide to us?

In general terms, we use Personal Information to provide you with the services you request, process payment, for customer research and to send you marketing and promotional emails. We may also use the Personal Information we collect to notify you about important changes to our Website.

We may use Personal Information we collect to notify you about new services and special offers we think you will find valuable. We may share your Personal Information companies with Swimathon Foundation and its group companies. We ensure your Personal Information is protected by requiring Swimathon Foundation and its group companies to follow the same or substantially similar rules when processing it.

We may also pass your Personal Information to our third party partners. Please note that this will only be done if you have consented to receiving such communications at the point of registration (via an opt-in box) or at any time. If you do not wish to receive these communications you must leave the opt-in box unticked at registration or notify us at any time by emailing us at info@participationsport.com or by

clicking the “unsubscribe” button at the bottom of email communications which we or the third party partner send you.

If you think that the data we hold on you is incorrect, or outdated, email us at info@participationsport.com and we will ensure it is changed or removed.

Opt out of receiving emails

You can unsubscribe from our emails at any time by clicking on the Unsubscribe link in the footer of the email you have received. Alternatively, email us at info@participationsport.com. Please allow 48 hours for your email address to be removed from our system.

Our policy on Cookies

In common with other commercial websites, our Website utilises a standard technology called “cookies” and web server logs to collect information about how our Website is used. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our Website, and the websites and apps visited just before and just after our Website.

We use cookies to:

- remember you when you visit this Website to keep track of your browsing patterns and to build up a profile of how you and other users use the Website;
- make our Website work as efficiently as possible; and
- facilitate transactions and administer services to you and to our partners.

What is a cookie?

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site’s computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser’s preferences allow it, but in order to protect your privacy, your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. Find out more about the use of cookies on <https://ico.org.uk/your-data-matters/online/cookies/>.

How do we use information we collect from cookies?

As you browse our Website, the site uses its cookies to differentiate you from other users to prevent you from seeing unnecessary advertisements or requiring you to log in more often than is necessary. Cookies, in conjunction with our web server’s log files, allow us to calculate the aggregate number of people visiting our Website and to determine which parts of the Website are most popular. This helps us gather feedback to constantly improve our Website and better serve you.

Cookies do not allow us to gather any Personal Information about you and we do not generally store any Personal Information that you provided to us in your cookies.

Third party cookies

Most of the cookies we use are ours, however, on occasion, we will issue a cookie by a third party to help us operate the Website – these are sometimes known as “web beacons” or “clear gifs”. These cookies cannot be used to identify an individual as they are completely anonymised; they can only be used for statistical purposes, for example, in providing you with advertisements that are more relevant to your interests.

For this purpose, we may disclose:

- generic, aggregated or anonymised data relating to your visits and use of our Website, but we will not disclose any of your Personal Information which identifies you or from which you may be identifiable i.e. we will not disclose your contact details such as your email address, name, address or telephone number; or
- information in a pseudonymised form such as a browser cookie ID / code or cryptographic hash of your email address to help us tailor and display our ads to you on other services. This ID or

code is matched against your equivalent unique code similarly generated by our ad partners to tailor advertising to you.

The third party companies that generate these cookies have their own, very strict, privacy policies but we don't have access to these cookies; other than allowing them to be served, we have no role to play in these cookies at all (although we may use statistical information arising from these third party cookies and provided to us by third parties, to improve our Website and apps experience). You may opt out of Google's use of cookies by visiting the Google advertising opt-out page (<https://www.google.com/policies/technologies/ads>). For more information on opting out of third party vendors' use of cookies please visit Your Online Choices (<http://www.youronlinechoices.com/uk>).

We use Facebook services to deliver our ads to you during your browsing experience / whilst you are online. You can control how Facebook uses data to show you ads by turning off ads which may be based on interests and / or your relationship with specific advertisers, in your ad preference settings. For further information, please visit Facebook which allows you to learn more about Facebook ads and cookies and to update your settings (www.facebook.com/policies/cookies).

For example, third party vendors such as Google and Facebook, show our ads on sites on the internet and use cookies to serve ads on such sites (including your Facebook account) based on your relationship with us or prior visits to our Website and to determine which advertisements and promotions users have seen and how users responded to them and to serve advertising to our Website. Analytics data may also be used to this effect.

If you have opted out of receiving our marketing communications when you register with us, we will not share your details with Facebook in a pseudonymised form and we will not appear as a named advertiser in your settings. Please note however that where you have opted out of receiving our marketing communications via the methods described above, you may still see our non-targeted adverts whilst you are online if your interests settings on Facebook are aligned to an audience segment (pre-defined by Facebook) which our business is also associated with. We do not control whether these ads are displayed to you. Please see the relevant link above for details on how to learn more and manage Facebook ad settings.

Further, to learn more about adverts which are displayed to you whilst you are online, please consult the applicable website's privacy and cookies policy and the Your Online Choices link above.

How do I remove or block cookies?

Most browsers allow you to remove any cookies and/or block any new cookies being set. To turn off cookies, look at the "help" menu on your browser. However, please note, that switching off cookies may restrict your use of the Website and/or delay or affect the way in which they operate.

Sharing personal information with third parties

We treat the security and method of processing your Personal Information very seriously, and we will never sell your Personal Information under any circumstances.

However, we may disclose your Personal Information to selected third parties in the following situations:

- if we buy or sell any business or assets, in which case we may disclose your Personal Information to the seller or buyer of such business or assets, as appropriate;
- if we are under a duty to disclose or share your Personal Data to comply with any legal obligation or in order to enforce or apply our terms and conditions and other agreements or protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction.

We may also disclose your Personal Information to third parties in accordance with your authorisation as expressed via "opt-ins" e.g. at the point of registration.

We shall share the following information with the Marathon Swims event organisers to allow them to organise the event:

- Your name;
- Your date of birth;
- Your contact information (for functional purposes only e.g. a session change);
- Your medical information;
- Your selected Marathon Swims event;
- Your swim speed.

How can you access and correct your Personal Information?

Should you have any queries about any Personal Information which we hold about you, you may submit a request to us by sending an email to info@participationsport.com and we shall endeavour to respond to any such request as soon as we are able.

Your consent and changes to our Privacy and Cookie Policy

By using our Website and/or apps you consent to our collection and use of your Personal Information as described in this Privacy and Cookie Policy. If we change our privacy policies and procedures, we will post those changes on our Website to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it. By continuing to access our Website after any change is posted, you agree to any such change to our Privacy and Cookie Policy.

Where we store your personal data

The data that we collect from you may be transferred to and stored at a destination outside the European Economic Area. By submitting your Personal Information you agree to this transfer, storage and processing. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Privacy Policy.

Partners

When you register with us, there will be an option to “opt-in” to receiving communications from one of our partners. If you chose to “opt-in” to these communications, then only your email address and contact details will be passed on to the relevant partner. By choosing to “opt-in”, you are agreeing to our partners’ terms and conditions and privacy policies, which can be found at www.swimathonfoundation.org; www.participationsport.com;