

SwimStories Privacy and POPIA Consent

Version 1.2 – – 4 August 2026

SwimStories (Pty) Ltd (registration number 2023/632 126/07) ("**SwimStories**", "**we**"), of 7 Botha Street, Lemoenkloof, Paarl, 7646, is committed to protecting your privacy in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA"). This Privacy and POPIA Consent is read together with the SwimStories Terms & Conditions and Enrolment Agreement.

This version reflects SwimStories' confirmed policy decisions.

1. What Personal Information We Collect

We collect information necessary for enrolment and service delivery, including:

- names and contact details;
- identity information;
- emergency contact details;
- health and medical information relevant to swimming, including daily health screening (BUDS) information where applicable;
- developmental, emotional and behavioural information relevant to safe and appropriate placement;
- payment information;
- attendance, scheduling and progress records;
- photographs and videos, only where we have received your express consent for marketing use, or for the internal purposes described in clause 4; and
- website usage data (cookies, browser data, device information).
- Mandatory and Optional Information: Information needed for enrolment, payment, programme placement, health disclosure, emergency response and safeguarding is mandatory -- if it is not provided, SwimStories may be unable to enrol the Swimmer or allow participation. Marketing consent is optional; refusing it will not affect enrolment or participation.

2. How We Use Personal Information

We use your information to: process enrolments and assess programme suitability; administer lessons; ensure safety and medical readiness, including responding to emergencies; communicate with you; issue invoices and manage accounts; comply with legal obligations; maintain safeguarding and incident records; improve our services and website; and carry out marketing (only with your express consent).

3. Children's Personal Information

Because our services are provided to children, we process a child's personal information, including health information, only to the extent reasonably necessary for safe and effective delivery of our services, and only with the consent of the parent or legal guardian.

4. Photography and Internal Use

Marketing use of photographs or video recordings requires the Parent's separate, optional consent. If SwimStories wishes to photograph or video record a Swimmer for any other identifiable purpose, including progress reviews or instructor training, SwimStories will first ask the Parent's permission. Refusing consent will not affect the Swimmer's enrolment or participation.

5. CCTV

SwimStories Venues may be monitored by CCTV for safety and security purposes. Signage is displayed at monitored areas.

CCTV is used for safety, security and incident investigation purposes. It is not used for marketing without the Parent's separate consent, and access to CCTV footage is restricted to authorised personnel. CCTV footage is ordinarily retained for 30 days, after which it is deleted or overwritten, unless it is reasonably necessary or required by law to retain it for longer for the investigation of a specific incident, safety concern, insurance matter or legal claim. Where CCTV covers a shared area of Picardie Guest Farm, SwimStories and Picardie Guest Farm each control the system to the extent it covers their own operations.

6. Sharing of Information

We may share information with:

- instructors and administrative staff;
- emergency medical personnel;
- third-party service providers (including billing, scheduling, website hosting providers);
- Picardie Guest Farm or its authorised representatives, limited to the minimum information reasonably necessary for venue access, emergency response, safety, incident management, insurance, or regulatory or legal compliance; and
- Regulators or other authorities, if required by law.

Picardie Guest Farm may not use your information for unrelated marketing without your separate consent. SwimStories and Picardie Guest Farm act as separate, independent responsible parties for their own areas of operation, and as joint responsible parties only for CCTV footage and incident records covering shared areas.

WhatsApp Communication: SwimStories may use WhatsApp groups or direct WhatsApp messages for programme updates, reminders and operational communication. Where a Parent chooses to join a group, their mobile number, profile name and profile photograph may be visible to other group participants. Parents who do not wish to join a group may request essential communication by direct message or email.

Where SwimStories engages third-party service providers to process personal information on its behalf (its operators), it does so under written agreements that require the operator to keep the information confidential, to process it only on SwimStories' instructions, and to maintain appropriate security safeguards, as required by POPIA.

7. Security

We implement reasonable technical and organisational measures to safeguard personal information from loss, misuse, unauthorised access, or disclosure. Should there be a breach of security or a potential breach, we will inform you and attend to remedying it, and notify the Information Regulator as required by POPIA.

8. Retention

We retain personal information only for as long as necessary for the operational, legal or safety purposes for which it was collected. Health, incident and safeguarding records are ordinarily retained for the period reasonably required for insurance, safety and potential legal-claim purposes, after which they are securely deleted or de-identified, unless a longer period is required by law.

9. Your Rights

Under POPIA, you may: request access to your information; request correction or deletion; object to processing; withdraw consent (subject to what is reasonably necessary to continue providing our services); and lodge a complaint with the Information Regulator. A Parent may lodge a privacy complaint with the Information Regulator, after first raising the matter with SwimStories where appropriate, through the Information Regulator's official complaints portal.

10. Information Officer

Christine Storie is the Information Officer for SwimStories and may be contacted at swimstories@icloud.com.

11. Cookies

Our website may use cookies to enhance your experience. You may disable cookies in your browser settings.

12. Updates

We may amend this Consent from time to time. Updates will be posted on our website and, where the change is material, notified to you in writing before it takes effect.

DIGITAL POPIA CONSENT

- ☐ I consent to SwimStories collecting, storing and processing my and my child's personal information, including health information, in accordance with this Privacy and POPIA Consent.
- ☐ I consent to receiving optional SwimStories marketing and promotional communication by email or WhatsApp.
- ☐ I do not consent to optional marketing communication. I understand that I will still receive essential enrolment, payment, scheduling and safety communication.

ACCEPTANCE

This Consent is accepted online. Your child's name, your name and the date and time of acceptance, and the version of this document accepted, are captured automatically from your SwimStories registration record and do not need to be re-entered here.

- ☐ I confirm that the details in my registration record are correct and that I accept this Privacy and POPIA Consent electronically, as recorded in that registration.