

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

This notice applies to employees, children and parents.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the [General Data Protection Regulation](#), which applies across the European Union (including the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

KEY TERMS

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Littlebrook Nursey Limited, trading as Littlebrook Nurseries
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

PERSONAL INFORMATION, HOW IT IS COLLECTED AND WHY WE NEED TO USE IT

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

Please see below under the heading “**HOW WE USE YOUR DATA**” for more details about how we use your information.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share personal information with:

- companies within our group;
- third parties we use to help deliver our services to you, e.g. payment service providers;

- other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- third parties approved by you, e.g. social media sites you choose to link your account to or third-party payment providers;
- credit reference agencies.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, e.g. in relation to ISO or Investors in People accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal information with any other third party.

WHERE YOUR PERSONAL INFORMATION IS HELD

Information may be held at our offices and third-party agencies, service providers, representatives and agents as described above (see above: **'Who we share your personal information with'**).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: **'Transferring your personal information out of the EEA'**.

HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

We will keep your personal information while you have an account with us or we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

TRANSFERRING YOUR PERSONAL INFORMATION OUT OF THE EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g.:

- with your and our service providers located outside the EEA;
- if you are based outside the EEA.

These transfers are subject to special rules under European and UK data protection law.

If you would like further information please contact us (see 'How to contact us' below).

YOUR RIGHTS

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information — in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information — in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party — in certain situations
To object	The right to object: — at any time to your personal information being processed for direct marketing (including profiling); — in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us — see below: **'How to contact us'**; and
- let us have enough information to identify you (e.g. your full name, address and customer or matter reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

HOW TO COMPLAIN

We hope that we can resolve any query or concern you may raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

CHANGES TO THIS PRIVACY POLICY

This privacy notice was published on 25 May 2018.

In some instances, we may have to change, modify or amend this privacy statement in order to comply with the evolving regulatory environment or the needs of our business. Subject to any applicable legal requirements to provide additional notice, any changes to this privacy statement will be communicated through our websites and mobile applications. However, if there will be changes made to the use of your personal information in a manner different from that stated at the time of collection we will take appropriate steps to notify you, such as by posting a notice on our website for 30 days prior to the changes taking effect or by emailing you.

HOW TO CONTACT US

Please contact us by email if you have any questions about this privacy policy or the information we hold about you at the following email address: privacy@littlebrooknurseries.com.

HOW WE USE YOUR DATA

CHILDREN

What personal data is held	Our legal basis of processing	Where do we get the personal data from
Name	Compliance with legal requirements, compliance with contractual obligations	Parents / carers filling in the Registration Form
Date of birth	Compliance with legal requirements, compliance with contractual obligations	Parents / carers filling in the Registration Form
Photos	Legitimate interests	1. Parents / carers provide consent by filling in the Registration Form 2. Camera (including the SD card)
Religion	Compliance with contractual obligations	Health form
Address and post code	Compliance with legal requirements, compliance with contractual obligations	Parents / carers filling in the Registration Form
Child's name on accident reports / incident form	Compliance with legal requirements, protection of vital interests of data subjects	An Incident Form is filled in by a Nursery Nurse and checked and signed by the Manager
Child's name for any reportable death, injury disease or dangerous occurrence (RIDDOR)	Compliance with legal requirements, protection of vital interests of data subjects	N/A
Medical records	Compliance with legal requirements, protection of vital interests of data subjects	Parents / carers filling in the Registration Form
Outing permission	N/A as there are currently no outings	N/A

What personal data is held	Our legal basis of processing	Where do we get the personal data from
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Emergency permission treatment	Protection of vital interests of data subjects	Parents / carers filling in the Registration Form
Child register	Compliance with legal requirements, compliance with contractual obligations	Nursery Nurse fills in the time in and out for each child from a list printed from Parenta
Dietary requirements	Compliance with legal requirements, protection of vital interests of data subjects	Parents / carers filling in the Registration Form
Names or photos on Coat Pegs	Legitimate interests	Parents / carers filling in the Registration Form/photographer
Child's name for 2 / 3 year Council funding	Compliance with legal requirements	Parents

PARENTS / CARERS

What personal data is held	Our legal basis of processing	Where do we get the personal data from
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Name	Compliance with contractual obligations	Parents / carers filling in the Registration Form
Address and post code	Compliance with contractual obligations	Parents / carers filling in the Registration Form
Phone numbers	Compliance with contractual obligations	Parents / carers filling in the Registration Form
Signatures	Compliance with contractual obligations	Parents / carers filling in the Registration Form
Email address	Compliance with contractual obligations	Parents / carers filling in the Registration Form
Vehicle registration number	Where processed, legitimate interests	Where obtained, verbally from parents

What personal data is held	Our legal basis of processing	Where do we get the personal data from
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Bank account details	Compliance with contractual obligations	Parents / carers filling in the Registration Form
National Insurance Number	Legitimate interests	Parent

EMPLOYEES

What personal data is held	Our legal basis of processing	Where do we get the personal data from
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Name	Compliance with legal requirements, compliance with contractual obligations	CV, Application Form, Starter Form, References
Gender	Compliance with legal requirements, compliance with contractual obligations	CV, Application Form, Starter Form, References
Date of birth	Compliance with legal requirements, compliance with contractual obligations	CV, Application Form, Starter Form,
Marital status and dependents	Compliance with contractual obligations	CV, Application Form, Starter Form, References
Next of kin and emergency contact details	Compliance with contractual obligations	Starter Form
Bank account details, payroll records and tax status information	Compliance with legal requirements, compliance with contractual obligations	CV, Application Form, Starter Form
Pension and benefits information	Compliance with legal requirements, compliance with contractual obligations	CV, Application Form, Starter Form
Copy of driving licence, ID Card or passport	Compliance with legal requirements	Copy of driving licence or passport provided by employees

What personal data is held	Our legal basis of processing	Where do we get the personal data from
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Training records	Compliance with legal requirements, compliance with contractual obligations	IHasco's online training system
Disciplinary and grievances	Compliance with legal requirements, compliance with contractual obligations	Information obtained from employees and HR
Race, ethnicity, health, genetic information and biometric data	Compliance with legal requirements, compliance with contractual obligations	Starter Form
Performance information	Compliance with contractual obligations	Performance reviews
Photos	Legitimate interests	Photos taken by using a camera
Signature	Compliance with contractual obligations	Contract
Address and post code	Compliance with contractual obligations	CV and Application Form
Email address	Compliance with contractual obligations	CV, Application Form, Starter Form
Vehicle registration number	Compliance with contractual obligations	N/A, not taken as ANPR is not used
Name, address and national insurance number on pay slips	Compliance with legal requirements, compliance with contractual obligations	Fourth
CCTV coverage	Legitimate interests	CCTV
Name on employee attendance records	Compliance with legal requirements, compliance with contractual obligations	CV, Application Form, Starter Form

What personal data is held	Our legal basis of processing	Where do we get the personal data from
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Timesheets	Legitimate interests	Agency
Accident reports	Compliance with legal requirements	An Incident Form is filled in by a Nursery Nurse and checked and signed by the Manager
Names and DBS checks	Compliance with legal requirements	Email or presented by employee
National Insurance Number	Compliance with legal requirements, legitimate interests	Application Form, Starter Form
Names on rota	Legitimate interests	CV, Application Form, Starter Form

OTHER

What personal data is held	Our legal basis of processing	Where do we get the personal data from
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Visitors and Subcontractors names	Compliance with legal requirements	Signing in book
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