



Sunbeams Pre-school - GDPR Privacy Notice - Issue 1

BACKGROUND:

Sunbeams Pre-school understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our customers and employees and will only collect and use personal data in ways that are described here and in a way consistent with our obligations and your rights under the law.

1. Information About Us

Sunbeams Pre-school
Limited Company registered in England under company number 7258882.
Registered Charity No. 1137023

Registered address:
Sunbeams Pre-school (Radford Semele), School Lane, Radford Semele,
Royal Leamington Spa, CV31 1TQ.

Data Protection Point of Contact (PoC):
Gareth Jakeman (Committee Secretary)
Email address: sunbeams234@btinternet.com
Telephone number: 01926 470978
Postal Address: Sunbeams Pre-school, School Lane, Radford Semele, CV31 1TQ.

2. What Does This Notice Cover?

This Privacy Notice explains how we use your personal data i.e. how it is collected, how it is held and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the 'GDPR') as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified.

Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). We would welcome the opportunity to resolve your concerns ourselves however, so please feel free to contact us first using the details in Part 11.

5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us), some of which may also be shared with third parties:

- Name
- Date of birth
- Address
- Email address
- Telephone number
- Next of kin details

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for the following purposes:

- Providing and managing your account.
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by emailing sunbeams234@btinternet.com to make this request).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, post or telephone with information and news on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- There is no fixed period for the length of time personal data will be retained, therefore, Sunbeams Pre-school will conduct an annual review and cleanse of data ensuring that records are accurate and compliant.

8. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data in the UK. This means that it will be fully protected under the GDPR.

9. Do You Share My Personal Data?

We may share your personal data with other companies in our group for Contractual or Legitimate purposes.

We may sometimes contract with third parties to supply products and/or services to you on our behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month and, of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of: Data Protection Team):

Email address: sunbeams234@btinternet.com

Telephone number: 01926 470978

Postal Address: Sunbeams Pre-school, School Lane, Radford Semele, CV31 1TQ.

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be made available through an updated version of this ‘Privacy Notice’ which will be made available either via our website or following a request.

13. Implementation of Privacy Notice

This Policy shall be deemed effective as of 30th November 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This policy has been approved and authorised by:

Name:	Gareth Jakeman
Position:	Management Committee Secretary & Data Protection PoC
Date:	30/11/18
Date of next review:	30/11/19
Revision:	Issue 1