

Privacy Policy

Looking after your children is a great responsibility and as such your trust is very important to us. With that trust comes the important responsibility to protect you and your children's personal data. Our Privacy Policy explains in details the types of personal data we need to collect about you and your child (ren) when you make a booking with us, visit our website or sign-up to our newsletters/ mailing list. As we are processing personal data when you book with Clubland Breakfast, Afterschool and Holiday Clubs, Clubland Playscheme Limited is the data controller.

When do we collect your data?

When you register your child - we will collect relevant information we need to care for your child, process you're booking, keep you informed of your booking details and future events!

When you contact us via phone or email- we will keep emails from you and we may make notes on your booking/registration form or on our database so that we can act in your child's best interests.

When you complete our optional surveys- we will keep a record of your answers and may follow up with you, but you have the option to answer our surveys anonymously.

When you sign your child in and out of Clubland (breakfast, Afterschool & holiday) we will collect information about your sign in and out times, plus we may ask you to see and sign incident or accident forms.

When you follow us on Facebook and we use cookies to identify you on our website which helps us to personalise your online experience by remembering your details.

When you apply for employment!

What information do we collect and why?

In order to fulfil our Ofsted regulations, we are required to collect personal data about the parents/carer and child to ensure we can meet the child(rens) needs and welfare requirements. This information needs to be updated annually to ensure all the information we hold is valid and current.

Children

The personal data we need to collect includes, but is not limited to, date of birth, gender, medical information, specific needs (physical and behavioural) dietary requirements both religious or medical, religion, ethnicity and school details.

If your child is involved in an accident or incident whilst in our care we will complete a form detailing the nature of the accident or incident. You will be asked to sign it to confirm you have seen and understood it. Accident forms will be retained until the child reaches 21 years and 7 months.

Parents, Carer and People Booking

In order that we can care for your child(ren), you will be asked at the time of registration to provide your name, contact details in case of an emergency, the names of people who have parental responsibility of your child(ren) and if there are any shared care arrangements that would impact on your child(ren) collection.

You will be asked to nominate a Password to be used to identify persons who are unknown to us collecting your child(ren) or to identify yourself.

At the point of registration we will ask for an email address where we can send invoices, respond to queries, changes to bookings, handle complaints and send you marketing products relevant to Clubland. We also keep records of communication between you and us so we can better understand and respond to your needs. This is done with your consent and

on the basis that we have a legitimate interest to keep you informed. When booking holiday club we will ask you to send over a screen shot as proof of payment so that we can reconcile the accounts and secure your booking.

If you choose to pay over the phone via Chip & Pin, your details will not be retained, the only information we gather for reconciliation is date of payment, your name, child's name, invoice number/venue and amount.

Website Visit information

We use cookies to make our website more effectively. You can opt to block cookies on your computer- usually done through your browser (Chrome, Explorer etc).

As an employee we need to access your suitability as a child carer and so request details of your work experience, evidence of qualifications, bank details so we can pay you, details of any health issues so that we can support you and contact details such as telephone numbers and email so that we can share the staff rota and contact you with important information pertaining to your employment.

How and why will we use your personal data?

Personal data, however provided to us, will be used for the purposes specified in this policy or in relevant parts of the website. We may use your personal information to:

1. Enable you to use all the services we offer
2. Send you information about the products or services we provide (this will not be done without your consent)
3. Provide you with the services, products and information you have requested
4. Improve your browsing experience by personalising your interaction with our website
5. Handle the administration of any payment you make via credit/debit card, standing order, BACS or childcare voucher transfer

6. Collect payments from you and send statements and /or receipts to you
7. Comply with safeguarding, prevent and/or other legal or regulatory requirements.
8. Handle the administration of your employment application
9. Conduct surveys or customer research
10. Deal with enquiries and complaints made by you or about you relating to the website or us in general
11. Audit and/or administer our account

Customer Profiling

Google Analytics

We may use some of your personal information to analyse our digital performance, for example to see how our website can be improved to help us achieve our business objectives, to record how you are using the site or access the popularity of our marketing campaigns.

Communication and marketing

Where you have provided us with appropriate consent, we will contact you by email, texts and/or post with targeted marketing communications to let you know about our services and those with our partners which we consider be of particular interest to you. We will never rent or sell on your data to any third party companies and you can withdraw your consent to receive marketing communications at any time by clicking 'unsubscribe' at the bottom of an email. You can also request to be removed from our marketing list by emailing info@clubland-playscheme.com.

Disclosing Data for other reasons

In certain circumstances, the data protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances Clubland Playscheme Ltd will disclose requested data. However, the data controller will ensure that

the request is legitimate, seeking assistance from the company's legal advisers where necessary.

Security and Access to your Personal Data

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction, misuse, alteration, unauthorised disclosure or access to your personal information.

Your information is only accessible by appropriately trained staff. We may also use agencies and/or suppliers to process data on our behalf. We may also partner with other organisations and in doing so transfer and /or acquire personal data.

Please note that some countries outside the European Economic Area (EEA) have a lower standard of protection for personal data, including lower security requirements and fewer rights for individuals. We may transfer and /or store personal data collected from you to and/or at a destination outside EEA. Such personal data may be processed by agencies and /or suppliers operating outside the EEA. If we transfer and/or store your personal data outside the EEA, we will take reasonable steps to ensure that the recipients implements appropriate measures to protect your personal data.

Otherwise than set out in our Privacy Policy, we will only ever share your data with your consent.

Your rights

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for direct marketing purposes or to be unsubscribed from our email list at any time. You also have the following rights.

1. **Right to be informed.** - you have the right to be told how your personal information will be used. This policy and other policies and statements used on our website and in our communications are intended to provide you with a clear and transparent description of how your personal information may be used.
2. **Right of access**- you can write to us to ask for confirmation of what information we hold on you and to request a copy of that information. We have 30 days to comply with your request provided we are satisfied that you are entitled to see the information requested and we have successfully confirmed your identity
3. **Right of erasure**- Unless we are obliged by law to keep your personal data for a period of time, you can request that we delete your personal information that we hold on you.
4. **Right to rectification**- If you believe our records of your personal information to be inaccurate, you have the right to ask for these records to be updated.
5. **Right to restrict processing**- you have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.
6. **Right to data portability**- to the extent required by the General Data Protection Regulations (GDPR) where we are processing your personal information (i) under your consent, (ii) because such processing is necessary for the performance of a contract to which you are a party to take steps at your request prior to entering into a contract or (iii) by automated means, you may ask us to provide to you- or another service provider- in a machine - readable format.

To exercise these rights please send a description of the personal information in question addressed to Data Controller at [info @clubland-playscheme.com](mailto:info@clubland-playscheme.com). Where we consider that the

information with which you have provided does not enable us to identify you, we reserve the right to ask for (i) personal identification and /or (ii) further information.

Please note that of some of these rights only apply in limited circumstances. For more information, please consult **ICO guidance**.

You are further entitled to make a complaint about us or the way we have processed your data to the **Information Commissioners Office (ICO)** for further information on how to exercise your rights please see guidance at <https://ico.org.uk/your-data-matters/>

How long do we keep personal data for?

Child Personal Data

As a childcare provider, under the Limitations Act 1980, Childcare Act 2006 we are required to retain some records until the child reaches 21 years 7 months old. These records include personal details at the time of booking, records of parents, any accident /incident/child protection referrals and any additional notes made whilst in our care.

Financial Data

Under the HMRC requirements we must keep financial records for 6 years from the end of the last company financial year they relate to- this includes all monies received and from who.

We do not store card details within our system or in paper form when paying over the phone.

How do we protect personal data?

We secure access to all transactions areas to our website using 'https' technology.

Access to your data on our system is password protected and all staff are DBS checked to ensure they are vetted to handle child data.

We ensure that the information we hold is relevant and up to date by asking parents to renew registration forms annually. The database is updated and old registration forms are shredded.

Paperwork containing your and/or your child's personal data which is shared with our staff on site is stored securely in a secure room. Staff on site need this information to properly care for your child and to make appropriate decisions regarding their welfare. All staff are DBS checked.

When paperwork is returned to Head Office we shred the information we are not required to keep. Your child's details are removed from our database and personal data is retained till the child reaches 21yrs 7 months (see above). The information we are required to keep is stored in a secure room, only Head office staff have access. At the end of this period your child's details will be shredded.

All staff records are stored on our server which is password protected and limited to only senior management. Details of health concerns and next of kin is held securely at the setting for emergency use.

Lawful Processing

We are required to have one or more lawful grounds to process your personal information. Five of these are relevant to Clubland Playscheme Limited:

1. **Consent**- we hold recent, clear, explicit and defined consent or the individual's data to be processed for a specific purpose.
2. **Contract**- The processing is necessary to fulfil or prepare a contract for the individual.
3. **The legal obligation**- we have a legal obligation to process the data (excluding a contract).
4. **Vital interests**- Processing the data is necessary to protect a person's life or in a medical situation.

5. **Legitimate interests**- The processing is necessary for our legitimate interests. This condition does not apply if there is a good reason to protect the individual's personal data which overrides the legitimate interest.
- a. **Consent**- we will ask for your consent to use your information to send you electronic communications such as newsletters and marketing emails and text, for targeted advertising and profiling, and if you ever share personal information with us.
 - b. **Contractual Relationships**- We will process your personal information so that we enter contractual relationships with you to deliver our services or if you apply for employment with Clubland Playscheme Ltd.
 - c. **Legal Obligations**- We will be obliged to process your personal information to comply with legal or regulatory requirements from time to time. We will only ever do so when strictly necessary.
 - d. **Vital Interests**- We will only ever process your personal information on the grounds of Vital Interests in a medical situation or to protect a person's life.
 - e. **Legitimate Interest**- Applicable law allows personal information to be collected and used if it is reasonably necessary for our legitimate activities, as long as its use is fair, balanced and does not unduly impact individual's rights.