

Tiny Thinkers' Data Protection Policy

Who does this Policy apply to?

This Policy applies to any prospective, current or former customer of Tiny Thinkers' services, website and social media. Tiny Thinkers' services include child care and other related services.

A separate Data Protection Policy applies to prospective, current and former staff.

Who is the data controller?

Tiny Thinkers is made up of a number of affiliated entities and businesses. Tiny Thinkers Limited (09024887) is the company that processes your personal data as the data controller. The registered address is 192 Tudor Drive, Kingston, Surrey KT2 5QH United Kingdom.

For any questions regarding data protection and privacy please email the head office at info@tinythinkerschildcare.com or by post to the address above.

In this Policy, 'we', 'us' and 'our' means the relevant related entity or business of Tiny Thinkers; 'you' or 'your' means customer; and 'services' includes child care and other related services.

What legal basis do we rely on to process your personal data?

Tiny Thinkers relies on the following legal basis for processing your personal data.

- Performance under a Contract: For prospective, current and former customers, most of the personal data we process is necessary for us to perform our obligations under a contract we have with you.
- Legal Obligations: For prospective, current and former customers, there are many laws that require us to process your personal data. Examples include law and regulations for child care, safeguarding, health and safety, tax and government funding.
- Legitimate Interest: For prospective, current and former customers, we have a legitimate interest in processing some of your personal data. We will only process your personal data if our legitimate interests do not materially impact your fundamental rights, freedoms and interests. An example includes use of your email address to send you a newsletter or

information about your services. You have the right to stop receiving these communications at any time. In some locations, we use CCTV for security/safety of our customers, staff and premises; to help prevent and detect crime; to support learning and training; and to defend legal claims.

- Special Categories of Personal Data: For prospective, current and former customers, we may need to process special categories of personal data necessary for the contract we have with you and in order to fulfil our legal obligations. Special categories of personal data that we may process include health, race, religion, sexual orientation and disabilities related information.

When do we collect your personal data?

There are a variety of situations when we will collect your personal data.

When you visit our websites or our social media sites, we will collect your personal data when:

- We monitor your visit to any of our websites or engagement with us on our apps or social media.
- You provide information to us, for example when you contact us for information or customer service; create an account or update your account information; register, enrol or make a reservation for our services; or make a payment for our services.

When you call one of our nurseries, we will collect your personal data when:

- You provide information to us, for example when you contact us for information or customer service; book a visit or appointment; register or make a reservation for our services; or make a payment for our services.

When you receive services from us, we will collect your personal data when:

- You provide information to us, for example when you contact us for information or customer service; book a visit or appointment; register, enrol or make a reservation for our services; make a payment for our services; and complete and submit contact forms or registration documentation.
- We complete forms, assessments and other documentation required for you to receive the services.

What personal data do we collect and process?

If you are a prospective customer, we will process the following categories of personal data about you:

- All personal data that you provide to us so that we may process your request for information.
- Details of your visits to our websites and social media.
- For locations with CCTV cameras, images may be captured.
- Sensitive personal data which could include health-related information relevant to determine suitability of the service.

If you are a current or former customer, we will process the following categories of personal data about you:

- All personal data that you provide to us while you are receiving our services.
- Details of your visits to our websites and social media.
- For locations with CCTV cameras, images may be captured.
- Care and service records that could include, for example, notes from meetings/calls; observations and assessments of you or your child's activities while we provide services to them (including illnesses, sleep, nappy changes, meals, medication, learning, interactions with others, and accidents); photographs to share with you and for identification purposes or learning records; and attendance records (including dates of service, user of service and reasons for service).
- If you receive government funding, we receive personal data from the government on your eligibility for the funding and other reporting identifiers.
- Government agencies may provide us with personal data to support their regulatory obligations or investigations.
- Other personal data provided to us by third parties in order to meet our legal obligations.
- Personal data about you and / or your child as necessary to respond to and defend legal claims or to pursue legal claims.
- Sensitive personal data about you and / or your child which could include:
 - Health-related and religious information necessary to provide the child/adult care or coaching services such as allergies, dietary requirements, medicines, health conditions, sickness; and/or
 - race, religion, sexual orientation and disabilities related information necessary to provide the services.

Why do we collect personal data?

We limit the collection of personal data to what is reasonably necessary and the main reasons for collecting your personal data are noted below:

- Respond adequately to your requests for services or information.
- Provide services to you and/or your child, including providing a safe and healthy nursery environment; administering first aid and other medical care as necessary; and supporting with education, communication, administration, and record-keeping.
- Provide resource material/information regarding our services and areas of interest to you, such as parenting and childcare.
- Comply with laws and government regulations/standards.
- Facilitate and process payments for the services.
- Fulfil tax, reporting, and other financial requirements and obligations.
- Prevent or detect unlawful acts.

We do not sell your personal data to any third parties.

Where do we process and store your personal data?

Electronic Information:

Your personal data remains on electronic storage data systems in the United Kingdom where we provide the service. This includes google drive.

Hardcopy Information:

The hardcopy of personal information we collect remains in the United Kingdom where you receive the services or provide the information.

Who do we share your personal data with?

We consider your personal data confidential and do not share it with anyone else except as described in this Policy. There are limited circumstances that require us to disclose your personal data to others in order to deliver our services and meet our contractual or legal obligations or legitimate business interests.

Examples include:

- Business Transfers: As we continue to develop our business, we might sell or buy assets. If any business unit is sold or substantially all of Tiny

Thinkers is acquired, personal data relevant to the operation sold may be transferred as part of the transaction.

- Comply with Legal Requirements: We share personal data if required by law/regulations or as we reasonably determine to be necessary and as permitted by law to protect our rights or the rights of others, to prevent harm or damage to persons or property, to fight fraud, or to enforce our website terms of use or other contractual rights of use. For example, the government may require us to disclose personal data for safeguarding or government funding purposes.
- Tiny Thinkers' affiliated entities and businesses: We may share your personal data with our affiliated entities and businesses as necessary to provide our services.

How long do we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected and as required under law. At the end of that retention period, your data will either be deleted completely or anonymized, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

What rights do you have over your personal data?

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The rectification of your personal data to ensure that it's up-to-date, accurate and complete.
- We stop processing your personal data for direct marketing purposes (either through specific channels or all channels).
- We and other third parties cease processing your personal data when this was previously undertaken on the basis of your consent and you have now withdrawn that consent.

To request copies of your personal data, please email info@tinythinkerschildcare.com.

To ask for your information to be amended, please email or call us at the nursery providing the service directly to you.



To ask for us to stop direct marketing communications to you, you can email us and ask to be 'unsubscribed'. We will then stop any further emails from that particular mailing list.

Please note that you may continue to receive communications for a short period after changing your preferences.

In circumstances where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data that doesn't infringe your rights and freedoms. You have the right to challenge our decision to the Supervisory Authority or seek legal redress through the courts.

If you feel that your personal data hasn't been handled correctly, or you are unhappy with our response to any requests you have made regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

How do we protect your personal data?

We utilise appropriate technical, organisational, and physical safeguards to protect your personal data we process in both physical and electronic formats. We provide adequate and appropriate data protection, privacy and security training and conduct internal periodic quality assurance audits to ensure we maintain these standards.

However, please note that no computer system or information can ever be fully resilient against every possible hazard or risk. We do maintain appropriate levels of security in accordance with data protection, privacy and security laws and regulations in the territories we operate and keep these under review.

You also play a valuable part in protecting the security of your personal data.

Will this Policy change?

This Policy is subject to change in order to remain compliant with data protection and privacy laws in the territories in which we operate. We will post revisions to this Policy on our websites. This Notice was last updated in May 2020.

Any Questions?



We hope this Policy has been helpful in setting out the way we process your personal data. If you have any questions please contact us at info@tinythinkerschildcare.com or by post to Tiny Thinkers Limited, 192 Tudor Drive, Kingston, Surrey KT2 5QH.