

PRIVACY POLICY

1. Introduction

This privacy policy provides you with details of how we collect and process your personal data at our nurseries and through your use of our site www.kindrednurseries.co.uk.

Kindred Education Limited and our individual nurseries are the data controllers and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice). A complete list of our nurseries and their legal entity is located at the end of this document, under ‘Appendix 1’.

We have therefore developed this privacy policy to inform you of the data we collect, what we do with your information, what we do to keep it secure as well as the rights and choices you have over your personal information.

Throughout this document we refer to Data Protection Legislation means the Data Protection Act 2018 (DPA2018), United Kingdom General Data Protection Regulation (UK GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, it also includes the EU General Data Protection Regulation (EU GDPR). This includes any replacement legislation coming into effect from time to time.

Our full details are:

Full name of legal entities: Kindred Education Limited and nursery information (see Appendix 1) - 1 Rushmills, Northampton, Northamptonshire, NN4 7YB

Our named Data Protection Officer is: Ruth Pimentel

Email address: dpo@kindrednurseries.co.uk

Postal address: Kindred Education Limited, 11 Brooklands Court, Kettering Venture Park, Kettering, NN15 6FD.

As part of GDPR it’s important that the information we hold about you is accurate and up to date. If you have any changes to your data please let us know by contacting our Data Protection Officer.

2. Policy Aims

Kindred Education Limited is committed to being transparent about how it collects and uses the personal data of its families and its workforce, and to meeting its data protection obligations. This policy sets out the organisation’s commitment to data protection, and individual rights and obligations in relation to personal data.

- Personal information (such as name, address and contact details, relation to child)
- Proof of identity for adults
- Card details for Family Pay (if this payment option is selected)
- Fingerprints Entry System (where applicable)
- CCTV (where applicable)

3. Prospective Parent/Carer/Child Information Collected

When you express interest in Kindred Education Limited, we will collect and process the following data from you:

- your name
- email address which will be used to send you a confirmation email and, if you gave consent, Kindred Nurseries newsletters and news
- contact telephone numbers which will be used to call you to book your nursery visit
- child’s name, age

How do we collect this information?

- Our registration form
- Our parent app, Kindred Satchel
- Fingerprint entry system (where applicable)
- CCTV system (where applicable)

Why we collect and use this information?

We use child data:

- to support child learning
- to monitor and report on child progress
- to provide appropriate care
- to assess the quality of our services
- to comply with the law regarding data sharing

How do we collect this information?

Data will be collected via our website enquiry form, telephone or email when you register an interest with our nursery.

Why we collect and use this information?

- To send you confirmation of a visit booked by email
- If explicitly consented to share Kindred Nurseries emails (newsletters, news and promotions)
- To call you and book in a nursery visit and understand your current needs
- To provide you with information about our availability and possible start dates, as well as a tailored understanding of what our services will provide.

Why we collect and use this information?

We use parent or carer data:

- to support a child’s care
- to help identify parents when collecting children
- for the purposes of maintaining open communication
- to assess the quality of our services
- to comply with the law regarding data sharing

4. Enrolled Parent/Carer/Child Information Collected

On registering and securing a place at Kindred Education Limited, the categories of child information that we collect, hold and share include:

- Personal information and contacts (such as name, date of birth and address)
- Characteristics (such as ethnicity, language, nationality, country of birth)
- Attendance information (such as sessions attended, absences and absence reasons)
- Assessment information (such as development records, progress reports and observations)
- Medical information (such as immunisation records, allergy information or dietaries)
- Relevant documentation for child protection and safeguarding concerns
- Special educational needs (including the needs and ranking)
- Details of any accidents / incidents / existing injuries
- Funding information and details, including birth certificates
- CCTV (where applicable)

Collecting child information

Whilst the majority of child information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the GDPR, we will inform you whether you are required to provide certain child information to us or if you have a choice in this. Data will be collected via your registration form and our parent app, Kindred Satchel, as well as through a selection of introduction forms when your child begins the nursery.

Collecting parent or carer information

When registering your child, the majority of the information you provide about yourselves will be mandatory, although we may also ask for some voluntary information to help us care for your child. Data will be collected via your child’s registration form and our parent app, Kindred Satchel, as well as through a selection of introduction forms when your child begins the nursery.

On registering and securing a place at Kindred Education Limited, the categories of parent or carer information we collect and hold include:

5. Legal Basis for Processing your data

The legal basis for processing your data is based on type of data that is being collected that we will have requested at the point the information was initially provided. Therefore, we will not store, process or transfer your data unless we have an

appropriate lawful reason to do so.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

1. Your consent. You are able to remove your consent at any time. You can do this by contacting your Nursery Manager
2. We have a contractual obligation.
3. We have a legal obligation.
4. We have a vital interest
5. We need it to perform a public task
6. We have a legitimate interest

6. Who will your personal information be shared with?

We may have to share your personal data with the parties set out below:

- All data is shared between the individual Nursery and Kindred Education Limited
- Other companies in our group who provide services to us.
- Service providers who provide I.T. and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies and Country Councils that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the GDPR and other Laws. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions and we will always have a legitimate reason for doing so.

If we are obliged to disclose personal data by law, or if the disclosure is necessary for purposes of national security, taxation and criminal investigation or to safeguard your child, we will do so. In some circumstances, you may not be notified first.

Your data is hosted on several different systems (See: "Authorised Third Parties"). All these providers have relevant safeguards in place to protect your data in the same way that we do.

7. Authorised third parties

We use a number of authorised third parties to provide our services. They are not permitted to use information we share with them for any other purpose.

We use third parties to assist us in processing your personal information, and we require these third parties to comply with our Privacy Policy and any other appropriate confidentiality and security measures. Any processors who process data outside the EEA have been reviewed to make sure that they have the appropriate safeguards in place for the security of the data.

Bluegreen Design

Secure hosting of Kindred Education Limited website is essential to both us and our families. That is why we entrust Blue Green Design, a long-established company, to protect all of our website data.

Family and Family Pay(our Kindred Satchel Parent App)

Your personal data will be input into the Family childcare system, which helps us manage your enquiry, care for your child and manage our nurseries. Your data is held in a secure data centre in Germany, Frankfurt on an AES-256 encrypted database. It can only be accessed by authorised personnel. Please find their Privacy Policies here: <https://www.famly.co/terms/privacy-policy>.
<https://www.famly.co/terms/famly-pay>

The Funding Loop

The Funding Loop provides a platform to capture and process of all information required to process a funding claim for those children accessing government funding. Their data is securely stored on datacentres in the United States. Please find their Privacy Policy here: <https://parents.fundingloop.co.uk/#/terms/viewPrivacyPolicy>.

Survey Monkey

We use Survey Monkey a small number of times a year to send you surveys regarding how you are finding our service, service improvements that could be made and assessing demand for future service changes. Their data is securely stored on datacentres in the United States. Please find their Privacy Policy information here: <https://help.surveymonkey.com/en/policy/#data-privacy>.

MailChimp

We use Mail Chimp to send a small number of emails throughout the year to customers who have shown an interest in our nurseries and have given consent to be contacted with our newsletters, news and promotions. Their data is securely stored on datacentres in the United States. Please find their Privacy Policy information here: <https://www.intuit.com/privacy/statement/>.

8. CCTV/Surveillance (where applicable)

We have installed CCTV systems in some of our premises, for the purposes of user, visitors and staff safety and crime prevention and detection. CCTV is also installed on the outside of some of our buildings for the purposes of monitoring building security and crime prevention and detection. In all locations, signs are displayed notifying you that CCTV is in operation. Images captured by CCTV will not be kept for longer than necessary. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated. You have the right to see CCTV images of yourself and be provided with a copy of the images. We will only disclose images and audio to other authorised bodies who intend to use it for the purposes stated above. Images and audio will not be released to the media for entertainment purposes or placed on the internet for public viewing. We operate CCTV and disclose in accordance with the codes of practice issued by the Information Commissioner and the Home Office.

9. Fingerprint Entry System (where applicable)

We have installed fingerprint entry systems in some of our premises, for the purposes of safeguarding access to the nursery buildings. Fingerprint images captured by the entry system will not be kept for longer than necessary. We operate the fingerprint entry system in accordance with the codes of practice issued by the Information Commissioner and the Home Office.

10. Data Security

Throughout our business we have put in place significant security measures to prevent your personal data from being breached. This includes your data being lost, used, altered, disclosed, or accessed without authorisation.

We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

We take security measures to protect your information including:

- Limiting access to our buildings to those that we have determined are entitled to be there)
- Implementing access controls to our information technology
- We use appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, websites, mobile apps, offices and stores
- Never asking you for your passwords

11. Data Retention

Prospective Parent/Carer/Child

Kindred Education Limited will hold your data on file for up to 36 months. At the end of that period your data is deleted or destroyed.

Enrolled Parent/Carer/Child

Personal data gathered during the application process will be transferred to your child's personal file (either manual or electronic or both) and retained during his or her time at the nursery. After your child leaves the nursery, your personal data will be retained for 6 years.

Incident and accident forms are kept for 21 years, then deleted or destroyed. In the case of Looked After Children, their personal data will be retained for 75 years before deletion/destruction.

12. Data Subjects' Rights

Data subjects have the following rights regarding data processing, and the data that is recorded about them:

- To make subject access requests regarding the nature of information held and to whom it has been disclosed.
- To prevent processing likely to cause damage or distress.
- To prevent processing for purposes of direct marketing.
- To be informed about the mechanics of automated decision-taking process that

will significantly affect them.

- Not to have significant decisions that will affect them taken solely by automated process.
- To sue for compensation if they suffer damage by any contravention of the GDPR.
- To take action to rectify, block, erased, including the right to be forgotten, or destroy inaccurate data.
- To request the ICO to assess whether any provision of the GDPR has been contravened.
- The right for personal data to be provided to them in a structured, commonly used and machine-readable format, and the right to have that data transmitted to another controller.
- The right to object to any automated profiling without consent.

13. Right to be forgotten

Under Article 17 of the GDPR individuals have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances. Whilst a child or employee still attends Kindred Education Limited, the right may not be exercised, as the personal data is still necessary for the purpose for which we originally collected it for.

14. Rights to Access Your Data

Data subjects have the right to access any personal data (i.e. data about them) which is held in electronic format and manual records which form part of a relevant filing system.

To obtain a copy of the personal information we hold about you, please email dpo@kindrednurseries.co.uk.

If you want to know more about your rights, please take a look at the ICO website link provided here. <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Before we will release any information to you, we will request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights).

This is a robust security measure and is designed to ensure that you have both the right and legal basis for accessing such information. It protects your data from being disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

15. Complaints

Data Subjects who wish to complain to Kindred Education Limited about how their personal information has been processed may lodge their complaint directly by email to dpo@kindrednurseries.co.uk. Or you can lodge a complaint directly with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

16. Cookies

A cookie is a small data file that is placed and stored on your device (computer, smartphone, tablet etc.) when you visit a website. When you visit kindrednurseries.co.uk we may automatically collect information that allows us to recognise and remember you through cookies.

How do we use cookies?

We use cookies in a variety of ways:

- Understanding how you use our site
- Analysing our communication with you
- Working with third party companies to serve you relevant advertising on other sites

What types of cookies do we use?

There are three main types that require consent.

1. Functionality cookies – these allow you to navigate the site and use our features, such as the 'find a nursery' location search.
2. Analytics cookies – these cookies allow us to measure and analyse how our customers use the site, to improve both its functionality and your experience.
3. Advertising cookies – these are used to deliver adverts relevant to you and help

us measure the effectiveness of our marketing campaigns.

How to manage cookies

You can manage cookies by changing your browser's cookie settings. These settings are usually found in the 'options' 'help' or 'preferences' menu of your browser. If you would like to know more visit our cookie policy.

17. Updates to this policy

This policy is reviewed frequently and updated on the Kindred Education Limited website. You may therefore want to visit here regularly to view our most up to date policy.

Appendix 1

Kindred Education Limited (Registered Company No.: 09753655) and our individual nurseries are the data controllers, and we are responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice). A complete list of our nurseries and their legal entity is below:

- Kindred Billericay - Kindred Education (Essex) (Limited Registered Company No.: 05120112)
- Kindred Bournemouth - Kindred Education (Bournemouth) LLP (Registered Company No.: OC383453)
- Kindred Cator Park - Kindred Education (Cator Park) (Registered Company No.: Limited 05440885)
- Kindred Durrington - Kindred Education (Wiltshire) Limited (Registered Company No.: 06806656)
- Kindred Girton - Kindred Education (Cambridgeshire) Limited (Registered Company No.: 04514829)
- Kindred Hainault - Kindred Education (Essex) Limited (Registered Company No.: 05120112)
- Kindred Hanwell - Kindred Education (Hanwell) Limited (Registered Company No.: 02953437)
- Kindred Harlow - Kindred Education (Essex) Limited (Registered Company No.: 05120112)
- Kindred Huntingdon - Kindred Education (Cambridgeshire) Limited (Registered Company No.: 04514829)
- Kindred Les Enfants - Kindred Education (Les Enfants) Limited (Registered Company No.: 07188053)
- Kindred Little Learners - Kindred Education (Little Learners) Limited (Registered Company No.: 08009012)
- Kindred Odstock - Kindred Education (Wiltshire) Limited (Registered Company No.: 06806656)
- Kindred Parsonage - Kindred Education (Wiltshire) Limited (Registered Company No.: 06806656)
- Kindred Mayflower - Kindred Education (Essex) Limited (Registered Company No.: 05120112)
- Kindred Quilters Out of School Club - Kindred Education (Essex) Limited (Registered Company No.: 05120112)
- Kindred Rayleigh - ABC Rainbow Day Nursery Limited (Registered Company No.: 03722306)
- Kindred Salisbury - Kindred Education (Wiltshire) Limited (Registered Company No.: 06806656)
- Kindred St Ives - Kindred Education (Cambridgeshire) Limited (Registered Company No.: 04514829)
- Kindred Teddington - Kindred Education (Teddington) LLP (Registered Company No.: OC364909)
- Kindred Wanstead - Wanstead Nursery Limited (Registered Company No.: 06875085)
- Kindred Westcliff - ABC Rainbow Day Nursery (Westcliff) Limited (Registered Company No.: 08465855)
- Kindred Windmill Montessori Nursery School - Windmill Montessori Nursery School Ltd (Registered Company No.: 08217685)
- Kindred Winterbourne Earls - Kindred Education (Wiltshire) Limited (Registered Company No.: 06806656)

BRIGHT STARS NURSERY LIMITED Registered Company No.:05395890
SUNNYFIELDS DAY NURSERIES LIMITED Registered Company No.: 00510374
MOOR END FARM DAY NURSERY LTD (Company No. 11249428),
RAINBOW HOUSE NURSERY LTD (Company No. 08663153)
ALPHABET HOUSE DAY NURSERIES LIMITED (Company No. 04717401)
The Grove Nursery and Preschool Limited (Company No. 04330716)

All of the above legal entities are registered in England and Wales and the Registered Office: 1 Rushmills, Northampton, Northamptonshire, NN4 7YB.

Last updated: 25th September 2023