Privacy Notice Policy

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Scribbles Day Nursery Group is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Please note that within this policy, the term 'staff' is used to cover all employees, volunteers, work placement trainees

Scribbles Day Nursery Group ('**We'**, '**us'** or '**are'**) presents this privacy notice to all users to inform, describe how and why we process or share your information when using our services, such as when you:

- Engage with us via marketing, sales, events, or any other related ways.
- Visiting our website at www.scribblesdaynurserygroup.com or any other website links that may be coincide with this privacy notice.

This Privacy notice intends to give the reader an understanding of our privacy rights and choices. If you do not agree with our policies or practices, unfortunately, we request you do not use our services. If you had any concerns or queries, please contact kirsty@scribblesdaynurserygroup.com

THE KEY POINTS SUMMARY

We are using this summary to provide key points from our privacy notice – though you can find below this section a table of contents to find the section you are looking for.

What personal information do we process? By using, visiting, or navigating our services, we may process personal information regarding how you interact with the group and their services, the products and features you use and the choices you make while interacting. Find more information regarding this in '**Section 1**.'

Do we process your sensitive personal information?
Some information that we process may be considered 'sensitive' or 'special' in certain jurisdictions, for example racial or ethnic origins, sexual orientation and religious beliefs, if this information were voluntary offered. We do not process any sensitive information.

Do we receive any information from third parties? No, we do not receive any information from third parties.

How do we process your information? We process your information to administer our services, provide, improve, for security and fraud prevention, communicate with you directly and lastly to comply with the law. We may process your information for other purposes, but only with your consent or when we have a valid legal reason to do so. Find more information regarding this in '**Section 2.'**

In what situations may we share personal information, and who are the third parties? We will only share information with specific third parties and in specific situations. Find more information regarding this in '**Section 4.**'

How do we keep your information safe? To protect your personal information, we have organisational and technical procedures and processes in place. However, we cannot guarantee 100% security due to no electronic transmission over the internet or information storage technology being 100% secure. We *cannot* guarantee that cybercriminals, hackers or other unauthorised third parties will not be able to override our existing security – using this to steal, access, collect and modify your information. Find information regarding this in '**Section 7**.'

What are your rights? Your rights are dependent on where you are located geographically, hence the applicable privacy law to you will be whenever you may be located. This may also mean you have certain rights regarding personal information. Find more information in '**Section 9**.'

How can you exercise your rights? The easiest way to exercise your rights is by contacting us directly. We will consider and act upon any request in accordance with applicable data protection laws.

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1. What information do we collect?

Personal information that you disclose to us
We only collect the personal information that you provide for us directly. This is voluntary information given to us when you express interest in us via obtaining further information such as regarding products and services, participating in activities or services or generally contacting us.

Personal information is only provided by you. The information we collect is dependent on the context of your interactions with us and the services, the choices you make and the features and products you use. Information we collect may include:

- Names
- Phone numbers
- Email addresses
- Mailing addresses
- Contact preferences

We do not process sensitive information. All information you provide us with must be true, accurate and complete, you must ensure you notify us of any changes to your personal information.

Information Automatically Collected

When you visit our site, some information such as your Internet Protocol (IP) Address and/or browser and device characteristics are automatically collected. This does not reveal your identity, such as your name, or contact information, but may include device and usage information such as;

- Referral URL's
- Language preferences
- IP Address
- Browser and device characteristics
- Operating systems
- Device name
- Country and rough location
- How and when you use the services

This information is used primarily for internal analytics and reporting purposes in relation to the company and our policies.

Information we collect includes:

- *Log and Data Usage.* This is a service-related, usage, performance and diagnostic information that our servers will automatically collect when you use our services or access our site. Depending on how you interact with us, log data may include your IP address, browser type, device information and settings about your activity in the services (e.g. date and time stamps, pages, files viewed, and other actions) and device event information (e.g. system activity, error reports and hardware settings).

- *Device Data.* This can include information about your phone, tablet, computer, or other devices that access the services. Depending on the devices used, this can include your IP address (or proxy server), device and application identification numbers,

browser type, hardware model, location, internet service provider and/ or mobile carrier, system configuration information and operating system.

- *Location Data.* How much information we collect depends on the type and the settings of the device you use to access the services, this information can be either precise or imprecise. For instance, we may use GPS and other technologies to collect geolocation data that tells us your current location, based upon your IP address. This information can be opted-out from, by disabling your location setting on your device or refusing access to the information. However, if you do choose to opt-out, you may have restrictions in regard to use of specific aspects of services.

2. How do we process your information?

Depending on how you interact with our services we may process your personal information for a variety of different reasons including:

- **To facilitate or deliver services to the user.** To provide you with the requested service we may process information.

- **To respond to user enquiries and to offer support to users.** To respond to your enquiries, we may process your information, we may also use this as to solve any potential issues you might have with requested services.

- **To send administrative information to you.** We may process information to contact you regarding products and services, changes to our terms and policies and other similar information.

- **To manage and fulfil your orders.** We may process your information to fulfil and manage your orders, returns, exchanges and payments made through the services we provide.

- **To protect or save an individual's vital interest.** When necessary, we may need to process your information to save or protect an individual's vital interest, such as preventing harm.

- **To enable user-to-user communications.** If you choose to use any of our offerings that allow for communication with another user, we may process your information.

3. What legal bases do we rely on to process your information?

We will only process personal information when we believe it is necessary, with valid legal reason to do so (legal basis) under the applicable law. This may include to comply with laws provide you with services to enter into our contractual obligations, your consent, to protect your rights and to fulfil legitimate business interests.

<u>This section applies to you if you are in the EU or the UK</u>

The General Data Protection Regulation (GDPR) and UK GDPR requires us to explain the valid legal bases we rely on to process your personal information and as such we may rely on the following bases to properly process your personal information legally:

- **Consent.** If you have given us permission/consent to use your personal information for specific purposes we may process your information, however, you can withdraw your

consent at any time you wish. Find more information about withdrawing consent in **'Section 8.'**

- **Contractual performance.** If we believe it is necessary to fulfil our contractual obligations to you, we may process your personal information. This includes providing our services or at your request, entering a contract with you.

- **Legal obligations.** Where necessary for compliance with legal obligations such as to cooperate with regulatory agencies or a law enforcement body, to exercise or defend our legal rights or to disclose your information as evidence in litigation in which we are involved, we may process your information.

- **Vital interests.** Where we believe it is necessary to protect your vital interests or vital interests of a third party, such as potential threats to the safety of any person, we may process your information.

Under European Data Protection laws, we are considered the 'data controller' described in this Privacy Policy, as we determine the means and/or purposes of the data processing that we perform. The personal information we process as a 'data processor' on behalf of our customers, does not fall under this Privacy Policy.

In these circumstances, the customer that we provide services to and with whom we have entered into a data processing agreement is considered the 'data controller' that is responsible for the customers personal information, and we are merely responsible for processing your information on their behalf in accordance with your instructions.

<u>If you are located in Canada, this section will apply to you.</u>

If you have given us specific permission (express consent) to use your personal information for a specific purpose, or if your permissions can be inferred from past or present situations, we may process your information. However, you can withdraw your consent at any time. You can find more information about withdrawing consent in '**Section 9**.'

In exceptional cases, we may be permitted under the applicable laws to process your information **without** explicit or inferred consent. For example:

- If collection is very clearly in the interest of the individual asking for services and consent cannot be obtained in a timely manner

- For fraud prevention and detection for investigations.

- When certain conditions are met for business transactions.

- The information is contained in a witness statement and the collection is necessary to assess, settle an insurance claim or process.

- To identify ill, injured, or deceased persons and communicating their next of kin.

- If we have reasonable ground to believe an individual to be a victim of financial abuse or that they may be at risk of becoming one in the future.

- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and that the collection is reasonable for

purposes related to investigating a breach of agreement or a contravention of Canada law or a province.

- If disclosure is required to comply with a warrant, court order, rules of court in relation to production of records and subpoena.

- If it was produced by the individual during business, profession, employment, and the collection is consistent with purposes for which the information was originally produced.

- Collection for solely artistic, literary purposes or journalism.

- If the information is publicly available and specified by regulations.

- If it was produced by an individual within the course of their business, profession, employment and the collection is consistent with the purposes for which the information was produced.

4. When and with whom do we share your personal information?

In the following situations we may need to share your personal information:

- **Business Transfers.** Sharing and transferring of your information in connection with or during negotiations of any company assets, financing, mergers or acquisitions of all or a portion of our business with another company.
- **Affiliates**. Under the circumstance that we share information with affiliates, we require them to honour this privacy policy. These affiliates include our parent company, and any subsidiaries, joint venture partners or other companies that we control/ are under common control with us.
- **Business Partners.** To offer you certain products, services and promotions, we may share your information with our business partners.

5. Do we use cookies and other tracking technologies?

We may use cookies and other similar tracking technologies such as web beacons and pixels to access or store information. Online tracking technologies may help us to maintain security within our services, alongside helping to prevent crashes, save preferences, assist with basic site functions and also fix bugs.

For more information regarding cookies and tracking technologies, this can be found in both **'Section 9'**, and **'Section 10'**, and can be found in our existing Cookie Notice.

6. How long do we keep your information?

We will only keep your personal information if it is necessary – this being for the purposes set out in this privacy notice, unless a longer retention period is required (or permitted by law) for tax, accounting, or other legal requirements.

Information will be deleted when we have no ongoing legitimate business need to process your information, however, if this is not possible – for example, if your information is stored in backup archives – then we will ensure to store your personal information, while isolating it from any more processing until it is able to be deleted.

7. How do we keep your information safe?

To protect any personal information, we may process we have implemented appropriate and reasonable technical and organisational security measures. However, as no transmission through electronic technology, especially the internet can be 100% secure, we cannot promise or guarantee that unauthorised third parties, hackers and cybercriminals will not be able to penetrate our processes, despite our safeguards and efforts. We will do our best to protect all of your information, but any transmission of personal information to and from our services is at your own risk. You should try to access the services through a secure environment.

We as a group closely follow The Data (Use and Access) Act 2025, GDPR and Data Protection laws and take into consideration the individual liberty of each user and aim to safeguard and abide by UK law to ensure the best possible service. To find out more please visit the following website: https://www.gov.uk/guidance/data-use-and-access-act-2025-data-protection-and-privacy-changes

8. Do we collect information from minors?

We as a company, do not know knowingly collect, solicit data from, or market to children under the legal age of 18 years old, or the equivalent age as specified by your jurisdiction's law – nor we do knowingly process this. As a condition of using our services, you represent that you are at least 18 years of age or the age specified in your jurisdiction, or that you are the parent or legal guardian of such a minor, and that you can further consent to such minor dependant using any of our services. In turn, if we learn that personal information from users that do not fit these specifications, we will make reasonable efforts to promptly delete any data that we have collected from our records. If you become of aware of any data collected from a child under the age of 18, or the equivalent preceding qualifications stated, please contact us at: kirsty@scribblesdaynurserygroup.com

9. What are your privacy rights?

In some regions – such as the European Economic Area (EEA), United Kingdom (UK) and Canada, you have rights that allow you greater control of your personal information and gain greater access to it. As a user you may change, review, or terminate your account at any time.

In regions such as EEA, UK, or Canada, you have specific rights under the applicable data protection laws – these may include the right to request access, and to obtain a copy of your personal information, to request rectification or erasure, or even personal information processing restrictions. In certain circumstances – you may be able to object to the processing of your personal data and information – this can be ascertained via contacting us directly. Find more information regarding this in **'Section 11'**, and '**Section 12**.' Any request will be considered in accordance with the applicable data protection laws.

If you are located within the EEA or the UK, and you believe we are unlawfully processing your personal information, you may have the right to make a complaint to your local data protection supervisory authority. Find their contact details here:
https://ico.org.uk/make-a-complaint/data-protection-complaints/ or
https://ec.europa.eu/newsroom/article29/items/612080

If you are in Switzerland, the data protection authorities contact details are available here: https://www.edoeb.admin.ch/en

Withdrawing your consent: if we are reliant on implied or express consent to process your personal information – you have the right to withdraw your consent at any time. You can withdraw consent at any time by contacting us directly using the details provided in '**Section 14'.**

Please note that this withdrawal will not affect the lawfulness before the withdrawal nor when the applicable law allows, will it affect the processing of your personal information which was conducted on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: At any time you can opt out from our marketing and promotional communications by clicking on the unsubscribe links that the emails entail, or by contacting us using the details provided in '**Section 14'.** You will be removed from marketing lists, however we may still communicate with you for service-related messages that are necessary for administration/ use of your account, responses to service requests or for other non-marketing purposes.

Cookies and similar technologies: Most web browsers are automatically set to accept cookies by default, you can usually choose to remove or reject cookies. If you choose to remove or reject cookies however, this could affect certain features of our services that we provide. If you have questions or comments about your privacy rights, you may email us at marketing@scribblesdaynurserygroup.com

10. Controls for do-not-track features

Most web browsers and some mobile operating systems and mobile applications do include a 'do-not-track' (DNT) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

California Laws requires us to let you know how we respond to web browser DNT signals, as there currently is no industry or legal standard in regards to recognising and honouring DNT signals, we do not respond to them at this time.

11. Do United States residents have specific privacy rights?

Yes, If you are a resident of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, or Virginia you may be granted specific rights in regards to your personal information access and retrieval – this allows you to gain access to personal information that we may maintain about you, and how we have processed this. This can include how we correct inaccuracies, deleting personal information and asking for copies of the information we hold in relation to you specifically. Withdrawal of consent may also be within your rights, in regard to processing your information, but may be limited in some circumstances by the applicable law to your specific state.

Categories of personal information we collect

This section covers personal information we have collected in the past 12 calendar months. This does not reflect the personal information we have collected from you as an individual, just what can be collected when using our services.

- **Identifiers.** We may collect identifiers such as contact details, postal addresses, telephone numbers (mobile and/or landline) unique personal identifier, alias, online identifiers, IP addresses, email address and account names.
- **Personal Information.** As defined by the California Customer Records Statute, this can include name, contact information, employment, education, financial information and employment history.
- **Protected Classification Characteristics.** These can include age, gender, date of birth, race, ethnicity, national origin, demographic data and marital status.
- **Geolocation Data.** This covers device locations.
- **Professional or Employment related data.** This is data in regards to business contact details (to provide you services), work history, and professional qualifications, in the event you were to apply for a job with our company.
- **Education Information.** Includes student records and directory information.

What personal information we do not collect:

- **Commercial Information.** Includes transaction information, purchase history, financial details, and payment information.
- **Biometric Information.** Fingerprints and voiceprints.
- **Network and Internet Activity.** This includes browsing history, search history, interest data, online behavior and interactions with our websites, applications, advertisements and systems.
- **Audio, sensory, electronic and similar information.** Includes images and audio, video, or call recordings created in connection with our business and activities.
- **Collected personal information and their drawn inferences.** Any inferences drawn from the collected personal information throughout **'Section 11'**, to create a profile or summary about the user. e.g. the characteristics of an individual or their preferences.
- **Sensitive personal information.**

We may also collect other personal information outside of these categories, though only from instances where you interact with us directly in person, online or by phone or email/mail in the context of:

- To receive help throughout our support channels;
- Participating in surveys, contests or other promotional activities, and
- To facilitate our services and their delivery, and to respond to inquiries.

Sources of Personal Information

To learn more about the sources of any personal information we collect please visit 'Section 1'.

How We Use and Share Personal Information

To learn more about how we use your personal information we collect please visit 'Section 2'.

Will your information be shared with anyone else?

In some circumstances, we may disclose your personal information with service providers if pursuant to a written agreement between us and the provider. Learn more about this in 'Section 4'.

We may use your information for business purposes, such as undertaking internal research. This is not considered as 'selling' of your personal information.

In the past 12 months, we have not disclosed, sold or shared any personal information to third parties for commercial or business purposes, we will not sell or share personal information in the future belonging to the any website visitors, consumers or users.

Your Rights

Under certain US State Data Protection Laws, you may have some rights – however, these rights are not absolute, and requests can be declined in some cases, as permitted by law. These rights include:

- **Right to know** if we are processing your personal data.
- **Right to access** your personal data,
- **Right to correct** inaccuracies in your personal data.
- **Right to request** personal data be deleted.
- **Right to obtain a copy** of any personal data that you previously shared with us.
- **Right to non-discrimination** for exercising your rights.
- **Right to opt-out** of your personal data being processed, if being used for targeted advertising (or sharing as defined under California's Privacy Law), profiling or the sale of personal data.

Dependent on the state you live in, you may also have the following rights:

- Right to access categories of personal data being processed (as permitted by the applicable laws, including Minnesota's Privacy Law).
- Right to obtain a category list of third parties to which we have disclosed personal data (as permitted by applicable laws – including the privacy laws in Maryland, Delaware and California.)
- Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable laws – including the privacy laws in Minnesota and Oregon).
- Right to review, question, understand and correct how personal data is being or has been profiled (as permitted by applicable laws – including the privacy law in Minnesota.
- Right to limit disclosure and use of sensitive personal data (as permitted by applicable laws – including the privacy law in California.)
- Right to opt-out of sensitive and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable laws – including the privacy law in Florida).

How to Exercise Your Rights

You can contact us to initiate exercising your rights via emailing kirsty@scribblesdaynurserygroup.com, or referring to the contact details at the bottom of this document.

Under US State Data Protection Laws, you have the right to designate an authorised agent to make this request on your behalf – however, we may deny a request from an authorised agent unless they are able to submit proof that they have been authorised under valid circumstances by the individual, and have permission on your behalf in accordance with the applicable laws.

Request Verification

We will need to verify your identity, as to determine that you are the same person about whom we have in our system – upon receiving a request for information and data. We will only use the information in your request to verify your identity or authorised agent to make the request- however, if we cannot verify your identity from this information (which must be previously maintained by us), we may request that you provide the additional information as to ascertain certification of your identity for the purposes of fraud prevention and for security.

In addition to this, if you were to submit the request through an authorised agent – we may need to collect additional information to verify your identity before we can process the request, the agent will need to provide a signed and written permission from you to submit such a request on your behalf, again for verification.

Appeals

Due to certain US State Data Protection Laws, if we decline to take action in regard to a request – you may have the right to appeal our decision. By emailing us at kirsty@scribblesdaynurserygroup.com, we can inform you in writing of any action taken, or not taken in response to your appeal – including a written explanation as to why we made these decisions. If your appeal is further denied, you may submit a complaint to your state attorney general.

California 'Shine The Light' Law

Yes, If you are a resident of California, USA, you are granted specific rights in regards to your personal information access. The 'Shine The Light' law, also known as 'California Civil Code Section 1798.83' permits users who are California residents to request and obtain, free of charge and once annually, information about personal information categories – if any – such as information disclosed to third parties for direct marketing purposes and the names and addresses of all third parties of which we have shared personal information with in the preceding calendar year. If you are a California resident and would like to make your request, please submit the request in writing to the contact details given below.

Residents in California under the age of 18 who have a registered account with the services, you have the right to request removal of unwanted data that you publicly post on the services. To ensure data removal and request this – please contact us with the contact details given below with your email address the account is associated with and a statement that you reside in California, USA. We will remove the data from public displays but be aware the data may not be removed completely or comprehensively from all of our systems such as back-ups

12. Do other regions have specific Privacy Rights?

Depending on which country you reside in, you may have additional rights.

Australia and New Zealand

We only process and collect personal information under the conditions and obligations set by Australia's Privacy Act 1988 and New Zealand's Privacy Act 2020 (Privacy Act).

This Privacy Policy satisfies the notice requirements defined in both Privacy Acts. Specifically, this covers which personal information we can collect from you, from which sources, for which purposes and other recipients of your personal information.

To fulfill the applicable purpose of which we need the personal information for, it may affect our ability to provide our services if you do not wish to provide this information, in particular:

- Offer you the products or services that you want
- Respond to or help with your requests

At any given time, you have the right to request access to or correction of your personal information. You can make such a request by using the contact details provided in **'Section 14'**.

If you do believe that we are processing your personal information unlawfully, you have the right to submit a complaint about a breach of the Australian Privacy Principals to the Office of the Australian Information Commissioner (https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us) and a breach of New Zealand's Privacy Principals to the Office of the New Zealand Privacy Commissioner (https://www.privacy.org.nz/your-rights/making-a-complaint-to-the-privacy-commissioner/).

Republic of South Africa

At any given time, you have the right to request access to or correction of your personal information. You can make such a request by using the contact details provided in **'Section 14'**.

If the manner of which we address your complaint is found to be unsatisfactory in regard to how we process your personal information, you can contact the office of the regulator, the details of which are:

The Information Regulator (South Africa) https://inforegulator.org.za/
General enquiries: enquiries@inforegulator.org.za
Complaints (Complete POPIA/PAIA Form 5 and send to:
PAIAComplaints@inforegulator.org.za & POPIAComplaints@inforegulator.org.za

13. Do we make updates to this notice?

Yes, we will update this notice to stay compliant with updated and relevant laws – the updated version will be revised with a date attached and will become applicable and effective as soon as made accessible. If we make material changes to this notice, we may notify you either by posting a notice prominently, or a direct notification. We encourage frequent reviews of this policy by users to be informed and up to date with how we protect your information.

14. How can you contact us about this notice?

If you are in the United Kingdom, we are the 'data controller' of your personal information. Kirsty Jenkins has been appointed to be our representative in the UK.

If you have any questions or comments about this notice, you may contact our Data Protection Officer (DPO), Kirsty Jenkins, by email at kirsty@scribblesdaynurserygroup.com or by post to:

Scribbles Day Nursery Group Ltd
Kirsty Jenkins / Data Protection Officer
217 High Street
Gorleston-on-sea
Norfolk
NR31 6RR
United Kingdom

15. AI trawling of websites.

Due to ongoing advances in AI, we can expect that our website and social media will be trawled for information by several AI bots or other databases - as this is not within our control, Scribbles Day Nursery holds no accountability for any information attained via any AI entity or information trawling. Information attained and shared by an AI bot may be incorrect, or out of date – which Scribbles Day Nursery both cannot, nor will take accountability for. We advise that information should be attained directly from the source, and checked against our various active online media.

16. How can you review, update, or delete the data we collect from you?

Based upon the applicable laws of your residence, you may have the right to request access to personal information we collected from you, delete it, or change the information. To request review, update or delete the personal information, please contact us directly.

17. Readers Panel

Readers Panel consist of:
Kirsty Jenkins, Nursery Director
Kathleen Bishop, Director of Operations
Dennie Thompson, Marketing & Social Media Co-ordinator