



Privacy Notice Policy

July 2023

Status: Active

Review Date: July 2025

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

Policy Name: Privacy Notice Policy
Author: Dennie Thompson, Marketing and Social Media Co-ordinator
Date: July 2023
Review Date: July 2025

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? No, we do not process sensitive personal 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 dependant 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 8.**'

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.

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.

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.

This section applies to you if you are in the EU or the UK

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.

If you are located in Canada, this section will apply to you.

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 8.**'

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.

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. For more information regarding cookies find our Cookie information in '**Section 8.**'

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 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. Find out more about The Data Protection Act (2018) here: <https://www.gov.uk/data-protection>.

8. 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 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://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

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

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 12**'.

Policy Name: Privacy Notice Policy

Author: Dennie Thompson, Marketing and Social Media Co-ordinator

Date: July 2023

Review Date: July 2025

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 12**’. 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

9. 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.

10. Do California residents have specific privacy rights?

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.

11. 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.

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12. How can you contact us about this notice?

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
217 High Street
Gorleston-on-sea
Norfolk
NR31 6RR
United Kingdom

13. 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.

14. Readers Panel

Readers Panel consist of:

Kirsty Jenkins, Nursery Director
Kathleen Bishop, Business Administration Manager
Dennie Thompson, Marketing & Social Media Co-ordinator
Managers Meeting dated 18.07.23