



## **Data Protection and Privacy Policy**

This policy covers the collection and use of personal data collected by this organisation, as required by GDPR and UK Data Protection legislation.

### **Data Controller**

The Data Controller is Jennifer Hutchinson and can be contacted by email – [jen@littlelearnersuk.com](mailto:jen@littlelearnersuk.com)

### **Types of Data Processed**

The various types of data that we collect and process are attached to this document as appendices

### **Length of Time Data will be Stored**

Data will be held for the minimum period required to fulfill the purpose or in accordance with additional legislation (e.g. accounting records have to be retained for 7 years for HMRC tax purposes)

### **Deletion of Data**

Data which has fulfilled its purpose will be deleted, subject to other legislative requirements

### **Data Storage**

Electronic Data will remain subject to EU Data Protection regulations (GDPR) within the UK/EU and will not be transferred to or stored on servers outside the UK/EU unless subject to the Privacy Shield agreement with the US see here for details <https://www.privacyshield.gov>

Paper storage of data will be held in lockable fireproof storage units

### **Complaint**

Should you have a complaint in relation to the collection, storage and use of the data collected from the website, you should contact the data controller. If you are unable to resolve the issue, you may make a complaint to the Office of the Information commissioner (ICO) via their website <http://tinyurl.com/yc4cozv2>

### **Right to access collected data**

Where data has been collected, retained and stored you have the right to view the data held about you. Please contact the Data Controller for details of the process and the administration fee.

### **Safeguarding data**

The organisation will take all proportional steps to safeguard the data from unauthorised access



## Appendix 1 Customer Data

*What data will be held?*

If the customer has made a booking:

- The customer name
- An email address for the customer
- A mobile number for the customer
- Child's name and age
- Child's medical conditions or allergies
- Consent for photos/videos
- Value of services purchased
- Any card details are processed by Stripe not our organisation

*For what purpose is it held?*

It is held for the purpose of holding a class register, contacting customers regarding the class or event they have booked onto and processing payment details of bookings placed and fulfilled. The age of the child is held so we can tailor learning to their age range and make reference to the age related EYFS guidance.

*Where will it be held?*

In the central Wordpress website booking system used to process bookings for classes or events. This system is held in the cloud on servers held in the UK/EU. Exports of current term bookings are stored in secure excel documents on an anti virus protected computer.

*Who will access this data?*

- People authorised to process the data for the purpose of processing a booking and processing payment of the same will have access to this data.
- This data may be shared with the marketing department, if consent has been given for this purpose.
- This data may be made available to the tax accountant of the organisation in order to audit and/or prepare statutory accounts and tax calculations for the organisation.
- Government officials on government business conducting an audit or investigation may have access to this data

*Basis of Processing this data*

This data is processed to meet legal requirements



## Appendix 2 Contacts

Contact data will have been provided by individuals verbally, by email, or obtained from a website or social media account.

*What Data is held?*

- Name
- Mobile telephone number
- Email address

*Where is it stored?*

It is stored

- In Google contacts
- In Gmail
- In my phone
- In MailChimp

*For what purpose is it held?*

- To contact you if you may be interested in any future services I or Little Learners provides
- As a record for me in terms of class registers and contacting you about the class or event

*Who has access to this data?*

Me and Little Learners Head office

*How is it kept safe?*

- All of this data is kept electronically except printed registers
- All devices have relevant and appropriate security measures to prevent unauthorised access

*Basis of Processing this data*

This data is processed to meet legitimate interest



## Appendix 3 Automated collection via the website

### Google Analytics

Google analytics data will be shared with Google to collect anonymised data relating to visits to the website, pages visited etc to inform us of the results of our marketing strategy in the form of statistics

*What data is tracked by Google Analytics?*

- Page Information
  - URL – the URL of the page the user is viewing
  - Title – the title of the page the user is viewing
- Browser Information
  - Browser name – the browser the user is using
  - Viewport or Viewing pane – the size of the browser window
  - Screen resolution – the resolution of the user's screen
  - Java enabled – whether or not the user has Java enabled
  - Flash version – what version of Flash the user is using
- User Information
  - Location – this is derived from the IP address where the hit originated. The IP address itself is not available in GA as it is personally identifiable information (PII) which violates the [terms](#) of Google Analytics.
  - Language – derived from the language settings of the browser

For further information on Google Analytics and its use of data, please use this link

<http://tinyurl.com/mkrpbqv>

### Cookies

*Why does this website use cookies?*

A Web server has no memory so the hosted Web site you are visiting transfers a **cookie** file of the browser on your computer's hard disk so that the Web site can remember who you are and your preferences. This message exchange allows the Web server to **use** this information to present you with customized Web pages

*What data does a cookie collect?*

The session cookie is stored in temporary memory and is not retained after the browser is closed. **Session cookies** do not collect information from your computer. They typically will **store information** in the form of a session identification that does not personally identify the user.

*Basis of Processing this data*

This data is processed to meet legitimate interest



## **Appendix 4 Photograph & Video footage from classes and events**

*What data will be held?*

If consented to via the booking form we will take photos and videos of your child during classes and events.

*Where is it stored?*

Photos and videos are taken on a smart phone and are deleted off the device after every class once uploaded to the child's individual google drive folders. These can only be accessed by myself and the customer via their email address.

*For what purpose is it held?*

To track learning, development and progress of the child for their private google drive folders. If consented to, photos and videos are also shared on social media platforms such as Facebook, Twitter, Instagram and our website for marketing purposes.

*Who has access to this data?*

Me and Little Learners Head office

*How is it kept safe?*

- All of this data is kept electronically on Google Drive
- All devices have relevant and appropriate security measures to prevent unauthorised access
- Only consented photos and videos are uploaded to drive and social media.
- We don't identify any children by name in photos.

*Basis of Processing this data*

This data is processed to meet legitimate interest