



Practitioner Privacy Notice

Busy Bees, St. Matthews, Shaftsbury Drive, Burntwood, Staffordshire. WS7 9QP
Registered in England and Wales Registered Company No: 4968957

Busy Bees Nurseries Limited (company number 03454787) of Busy Bees at St Matthews, Shaftsbury Drive, Burntwood, WS7 9QP ("Busy Bees") is the data controller for any personal information you provide to us regarding you or your child. This means we decide how your personal data is processed and for what purpose. Busy Bees Nurseries Limited has a number of subsidiaries which are collecting and processing personal data for the same purpose. Please see below for more information.

Busy Bees is required to collect and process data for a number of purposes concerning its staff, contractors, parents, children and any other individuals who come into contact with the company. In gathering and using this data Busy Bees is committed to protecting all individual's rights of freedom and privacy and meeting the requirements of the General Data Protection Regulation 2018 (GDPR) and the Data Protection Act 2018.

What personal data we collect about you and your child

Busy Bees contractual responsibilities include but are not limited to the collection of the following personal data:

- Personal details (name, date of birth, gender)
- Attendance information (start date, hours in nursery)
- Medical and health information
- Personal characteristics
- Dietary requirements and preferences (allergies or intolerances, food likes/dislikes)
- Special Educational Needs information
- Development records

The information we hold about you as a parent or guardian include:

- Personal details (name, date of birth, national insurance number)
- Contact details (address, phone number, email address)

- Bank details (name of bank, account number and sort code)

We do hold some special category data about you and your child regarding race, ethnic origin, religion and health information. The special category data is only collected as required by the Local Authority or other public bodies for legal and contractual purposes. We comply fully with the requirements of GDPR in relation to special category data and are aware of the sensitive nature of the information.

It is the duty of you, the Data Subject to let us know of any personal data that has changed or is incorrect, we send out annual declaration forms to ensure the data we hold on you is accurate.

How we process your personal data

Busy Bees complies with its obligations under the GDPR by keeping personal data up to date; storing and destroying it securely; not collecting or retaining excessive amounts of data; protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. All the data we process, we do so to fulfil the contract we have with you.

Busy Bees hold and processes your data to be able to:

- Provide the appropriate care for your child;
- Support your child's learning;
- Monitor and report on your child's progress;
- to notify you about changes to our service; and/or
- Ensure the right first aid and medication is provided to your child in cases where they become ill or have an accident in our care.

We have entered into a contract with you to provide child care for your child. Accordingly, the legal basis on which we process your personal information and your child's personal information, is to properly fulfil the contract we have you with for the care of your child.

There is certain data we hold about you as a parent or guardian to be able to successfully carry out the contract. The information we hold about you includes your name and address, contact details, bank details and signatures. We hold this personal data and use it to:

- Be able to contact you in case there is an emergency regarding your child;
- Be able to take payment for the childcare we are providing your child; and



- To provide proof of consent of your agreement to our contract terms and conditions.

Whilst much of the data you provide to us is mandatory to carry out the contract you hold with us, some of it is provided on a voluntary basis. To comply with the GDPR we will inform you at the time of collection whether the information you are asked to provide is mandatory. Where personal data is not required for legal or contractual reasons, we will give you the opportunity to provide or withhold your consent in relation to the use of such data and the purposes for which such information will be used.

The lawful basis in which we process this data

Busy Bees collects and process all the information you provide to us, as a parent or guardian, carry out the obligations of the contract. Without this data we will not be able to fulfil your contract and thus not be able to keep your child in our care.

The health and medical data you provide to us regarding your child is legally required and is vital to keep your child safe whilst in our care.

Data regarding your child's ethnicity, race and religion is only processed under the requirements of Local Authorities and public bodies and upholding Busy Bees equal opportunities policy and ensuring we are meeting the Equality Act 2010.

Some data will only be processed if explicit consent is given. This will include the ability to take photographs of your child and using your details for direct marketing. Where this is the case we will ask for your consent at the time we collect your data.

Who collects this data

Busy Bees collects most of its data directly from the individual themselves. The information we collect about you and your child will all be obtained from the application pack you fill out when you first enroll your child or the online form. Additional data is collected as part of the Annual Declaration and on an ad-hoc basis as required.

When will we disclose personal information to others?

We may need to share your personal information with members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries. These terms are defined in section 1159 of the UK Companies Act 2006. We will only share such personal information where this is necessary for the purposes set out in this policy. If you would like to see a list of our subsidiaries, please contact us using the details below. We only share personal data between our subsidiaries and group companies where this is necessary in order to properly administer our business, so



that we can provide childcare services and answer queries relating to and promote our childcare services.

We may need to share your personal information with certain selected third parties our business partners, suppliers and sub-contractors for the purpose of performing any contract we have with you or them. In particular we may use third party companies to provide IT support services;

We are legally obliged to pass some of your details on to third parties for legal reasons, such as public bodies. This includes Local Authorities, Ofsted, NHS, Police and enforcement agencies. We will not give information about you or your child to anyone outside of the company without your explicit consent unless the law or our terms and conditions allow us to.

We may also share data with organisations for trend analysis. The processing of this kind of data we are not legally required to do and therefore we will ask you for your explicit consent for us to share your data for this purpose

We may share your child's progress data with schools as they transfer from nursery, however this will only be done with the explicit consent from you as a parent or guardian.

We may also disclose your personal information to third parties in the following circumstances:

- if we buy or sell any business or assets in which case we may disclose your personal information to the seller or buyer of such business or assets; and/or
- if all or most of our assets are acquired by a third party, in which case personal information held by us about our customers will be one to the transferred assets.

We will always try to ensure that your personal data is processed within the European Economic Area. In some circumstances this will not be possible. In circumstances where it is necessary for us to transfer your personal outside the European Economic Area, we will only transfer such personal data to third parties where we have carried out due diligence on such third parties to ensure they will protect your personal data using similar standards and safeguards as we have. We will also have contractual provisions in place with such third parties to ensure your personal data is protected. Such contractual provisions will be based on the standard contractual clauses approved by the European Commission for the transfer of data outside the EEA or such other appropriate standards as are required from time to time by the European Commission or the UK Government. You consent to the transfer of your personal data outside of the EEA, as long as we comply with these requirements.

Storage and security of data

All your data is either kept in our software systems or in paper format. Data relating to you and your child will be kept in the nursery your child attends as well as at our supporting office locations. Personal data held within a software system will be securely protected with individual logins, which will only be given to those who need to access the data.

All data stored in paper format will be kept in a safe location where only those who are authorised to access it, can. This may include being locked away in a filing cabinet. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Email is not recognised as a secure medium of communication. For this reason, we request that you do not send private, sensitive or confidential information to us by email, and should you do so it is at your own risk.

Data retention periods

Busy Bees is committed to ensuring we do not hold personal data for any longer than necessary.

Data which we hold under contract is subject to specified retention periods. These are as follows:

- Parent and child personal data – Until the child is 26 years old
- Safeguarding information – Until the child is 26 years old
- Medical and health data – Will not be destroyed
- Accident data – Will not be destroyed
- Child learning progress – Given to the parent when the child leaves the nursery, if not collected by the parent or guardian this will be destroyed a term after the child has left the nursery

Once the data has been used for its original purpose and the retention period has expired, we will appropriately dispose of the data.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, we will provide you with a new notice explaining this new purpose. Where and whenever necessary, we will seek your consent to the new processing.

Your data subject rights

Under data protection laws you have the following fundamental rights:

- The right to access the personal data we hold about you and your child;
- The right to have your personal data and your child's personal data corrected if there are errors or inaccuracies in it, or your personal data or your child's personal data is incomplete;
- The right to restrict the processing we carry out in relation to your personal data or your child's personal data;
- The right to object to the processing we carry out in relation to your personal data or your child's personal data;
- The right to have the personal data we hold about you or your child provided to you in a useable format;
- The right to complain to a supervisory authority (in the UK this is the Information Commissioner's Office) about how and/or why we are processing your personal data or your child's personal data; and/or
- The right to tell us you no longer consent to us processing your personal data or your child's personal data.

You may request access to your personal information or your child's personal information by writing to us at the following address: Data Controller, Latchford House, Shenstone Business Park, Lynn Ln, Shenstone, Lichfield WS14 0SB or emailing our Data Protection Officer (DPO) on dpo@busybees.com. You do not have to pay us a fee to access your personal data unless we believe your access request is unfounded, repetitive or excessive. In this case we may charge you a reasonable fee to access your personal data or we may decide not to comply with your request. We will notify you if this is the case. We will require you to provide appropriate evidence of your identity before we respond to your request. Typically this identification evidence will be a photocopy of your passport or photo driving licence, which a solicitor or bank has certified as being a true copy of the original and a copy of a recent utility bill detailing your current address.

If you think that any of the data we hold about you or your child is incorrect or inaccurate, you can contact us to correct such data. To do this please contact us at Data Controller, Latchford House, Shenstone Business Park, Lynn Ln, Shenstone, Lichfield WS14 0SB or emailing our Data Protection Officer (DPO) on dpo@busybees.com.

If you feel Busy Bees has not handled your or your Child's personal details adequately or you are unhappy with how your data request has been dealt with contact the Data Protection Officer (DPO).

Your data subject rights



Under GDPR you as an employee have the right to request access to any of the data held by Busy Bees. If you wish to make a subject access request, please contact the Data Protection Officer (DPO).

If you feel Busy Bees has not handled your personal details adequately or you are unhappy with how your data request has been dealt with contact the Data Protection Officer (DPO).

Consent

Busy Bees is committed to ensuring where consent is required, it is freely given, specific and unambiguous. Where consent is required for additional processing, data subjects are given the opportunity to freely give their consent to us processing that data for the specified purpose. Additional consent forms will be distributed to gather additional permission.

Contact Us

If you have any questions or suggestions regarding our privacy policy, please contact us:

DPO – Head of Compliance

Latchford House, Shenstone Business Park,

Lynn Ln, Shenstone,

Lichfield, WS14 0SB

Email: dpo@busybees.com