



## **Journey's Leaves and Seeds (JLS) Early Education Specialist C.I.C Data protection/GDPR Policy and Procedure**

Journeys, Leaves and Seeds (JLS) Early Education Specialist CIC (JLS CIC) are committed to protecting your privacy. This statement explains how we use any information you give to us and the ways in which we protect your privacy. We ask you to read it carefully. We may be required to change it from time to time so we also ask you to check it occasionally to make sure you are aware of the latest version.

### **1. How we comply with GDPR and the DPA 2018 to be effective from 25th May 2018**

We treat any personal information, which means data from which you can be identified, including your name, address, email address, etc. that you provide us, or that we obtain from you, in accordance with the provisions of the Data Protection Act. Under this Act, we have a legal duty to protect any information we collect from you. Any amendments to this policy will continue to be in accordance with the provisions of the Data Protection Act 2018.

#### **We may hold information about you from when you**

- Book a class or session with us
- When you sign up to any of our waiting lists
- When you buy our online products or services
- Attend a forest school session
- Request onsite training or consultancy services

### **1. WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND DO WE PROCESS IT**

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- **Customer Data** that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details and purchase details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is



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the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

- User Data that includes data about how you use our website and any online services together with any data that you post through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.
- Marketing Data that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.
- We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Face book adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is our legitimate interests, which is to grow our business. Our lawful ground for this processing is legitimate which is to grow our business.
- Sensitive Data

We need to collect the following sensitive data from you in order to ensure the safety of your child / children : dietary requirements, allergies, medical data, learning difficulties. Where we are required to collect personal data by law, or under the terms of the contract between us, if you do not provide us with the correct data when requested, we may not be able to perform the contract (for example, offer classes to you). If you don't provide us with the requested data, we may have to cancel a class you have booked but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at [JLS.EE.Specialist@outlook.com](mailto:JLS.EE.Specialist@outlook.com) In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

### **3. HOW WE COLLECT YOUR PERSONAL DATA**

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising



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networks such as Facebook based outside the EU. We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### **4. MARKETING COMMUNICATIONS**

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time. We will not share your personal data with any third parties. If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

### **5. DISCLOSURES OF YOUR PERSONAL DATA**

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

- Other companies in our group who provide services to us
- Service providers who provide IT and system administration services.
- Professional advisers including our accountant, lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities.

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 law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

### **6. DATA SECURITY**

We have put in place security measures to prevent your personal data from being accidentally 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

### **7. DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.



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For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

Any personal data that is transferred to onto paper for our sessions is shredded on a daily basis.

Our sign in forms, have the booking persons first and second name on the sheet. Session registers are shredded daily and term time registers are shredded per term – these do not hold any data other than a name of the parent.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **8. YOUR LEGAL RIGHTS**

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights>

If you wish to exercise any of the rights set out above, please email us at [JLS.EE.Specialist@outlook.com](mailto:JLS.EE.Specialist@outlook.com)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to 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 security measure to ensure that personal data is not 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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://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.

### **9. THIRD-PARTY LINKS**



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This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit

### **10. COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function proper