Privacy Notice

What is the purpose of this document?

Plymtree Pre-school is committed to protecting the privacy and security of your and your children's personal information.

We are a data controller. This means we are responsible for deciding how we hold and use personal information about you and your children. This notice explains to you what decisions we have taken in relation to that information.

Our contact details are as follows:

Address	Plymtree Pre-school, Parish Hall, Plymtree EX15 2LE
Telephone	07928 786673
E-mail	plymtreepreschool@gmail.com

This privacy notice describes how we collect and use personal information about you during and after your relationship with us as a committee member, in accordance with the General Data Protection Regulation (GDPR). We encourage you to read this notice carefully, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

This notice applies to all parents of children attending the Pre-school and to the data we hold about them and their children.

We do not have an appointed Data Protection Officer and any queries in relation to how we hold and use your and/or your children's personal information should be directed to the Setting Manager or the Chairperson.

Data protection principles

In collecting and processing your and/or your children's personal information, we will comply with the data protection law in force at the time. This requires that the personal information we hold about you and/or your children must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.

5. Kept only as long as necessary for the purposes we have told you about.

6. Kept securely.

The kind of information we hold about you and/or your children

We will collect, store, and use a variety of categories of personal information about you and/or your children. Those categories are detailed in the Schedule to this notice.

We may also collect, store and use "special categories" of more sensitive personal information, which are also detailed in the Schedule to this notice.

How is your personal information collected?

We collect personal information about you and/or your children directly from you on request through our registration form.

How we will use information about you

We will only use your and/or your children's personal information when the law allows us to and as detailed in the Schedule to this notice.

Situations in which we will use your personal information

There are a variety of situations in which we will use the information we collect about you and/or your children and these are detailed in the Schedule to this notice. The information in the Schedule includes the use we make of particularly sensitive personal information, such as criminal records information.

Where we use your and/or your children's personal information to pursue the legitimate interests of the Pre-school, we will only do so provided your interests and fundamental rights do not override those interests.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your and/or your children's personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as to ensure the wellbeing of children in our care).

Change of purpose

We will only use your and/or your children's personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your and/or your children's personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your and/or your children's personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Do we need your consent to use particularly sensitive information?

We do not need your consent if we use your and/or your children's personal information in accordance with our written policy to carry out our legal obligations. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your child's attendance at the Pre-school that you agree to any request for consent from us.

Why might you share my/my children's personal information with third parties?

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your and/or your children's data and to treat it in accordance with the law.

We will share your and/or your children's personal information with third parties where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so.

Any third parties with whom we might share your and/or your children's personal information are detailed in the Schedule to this notice.

Transferring information outside the EEA

We do not anticipate transferring the personal information we collect about you and/or your children outside the EEA.

Data security

We have put in place appropriate security measures to prevent your and/or your children's personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your and/or your children's personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your and/or your children's personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Chairperson.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

We will only retain your and/or your children's personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your and/or your children's personal information are set out in the Schedule to this notice.

In some circumstances we may anonymise your and/or your children's personal information so that it can no longer be associated with you and/or your children, in which case we may use such information without further notice to you.

Your duty to inform us of changes

It is important that the personal information we hold about you and your children is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, the law grants you certain rights. These are summarised below. Please note that your rights may be limited and subject to restrictions in certain situations:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your and/or your children's personal information, object to the processing of that data, or request that we transfer a copy of that information to another party, please contact the Chairperson.

No fee usually required

You will not have to pay a fee to access your and/or your children's personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In any circumstances where you may have provided your consent to the collection, processing and transfer of personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Chairperson. Once we have received notification that you have withdrawn your consent, we will no longer process the information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Complaints to the UK supervisory authority

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your and/or your children's personal information.

If you have any questions about this privacy notice, please contact the Chairperson (07928786673**).**

Retention of Data Schedule

Personal data

Category of personal data	Disclosure recipients	Purpose of processing	Legal basis of processing	Assessment of individuals' interests	Time limit for deletion
Name and full contact details for both parents	Data collated by the Setting Manager and disclosed to: (a) Fees & Funding Officer (b) Chair	To hold accurate and up to date contact information for parents of children attending Pre-school in the event of emergency situations and to keep parents informed of activities and developments within Pre-school and of their child's progress	Necessary for the legitimate interests of the organisation	Impact on individuals' rights and freedoms is very low	Until 6 years after child leaves Pre-school
Meeting attendance (where committee meetings are attended as a parent)	Data is not disclosed to any third parties save as incidental to the location of the data specified in this register.	To maintain an accurate record of proceedings of the Committee	Necessary for compliance with a legal obligation Necessary for the legitimate interests of the organisation	Impact on individuals' rights and freedoms is very low Protection of the children in our care is of paramount importance	During the life of the charity
Name and address of child	Data collated by the Setting Manager and disclosed to the Fees &	To hold accurate and up to date contact information for children attending Pre-	Necessary for compliance with a legal obligation	Impact on individuals' rights and freedoms is very low	Until 6 years after child leaves Pre-

attending setting	Funding Officer. Fees & Funding Officer discloses data to Devon County Council.	school. To allow processing of funding applications for children attending Pre-school.	Necessary for the performance of a contract to which the data subject is a party Necessary for the legitimate interests of the organisation		school
Date of birth of child attending setting	Data collated by the Setting Manager and disclosed to the Fees & Funding Officer. Fees & Funding Officer discloses data to Devon County Council. At the point of transition to school, this information is provided to the primary school the child will be attending.	To allow processing of funding applications for children attending Pre-school. To enable Pre-school to transition children effectively to school.	Necessary for compliance with a legal obligation Necessary for the performance of a contract to which the data subject is a party Necessary for the legitimate interests of the organisation	Impact on individuals' rights and freedoms is very low	Until 6 years after child leaves Pre-school
Accident and incident records of child attending setting	To setting staff as required for the stated purpose of processing	To ensure the health, safety and well being of children attending Pre-school		Impact on individuals' rights and freedoms is very low	Until 6 years after child leaves Pre-school
Observation and assessment records of child	To setting staff as required for the stated purpose of processing	To ensure that each child's individual educational and development needs are	Necessary for compliance with a legal obligation	Impact on individuals' rights and freedoms is very low	Until 6 years after child leaves Pre-

attending setting (including any special educational needs and disability records)	At transition to school, this information is provided to the primary school the child will be attending This information may be reviewed (but not copied or otherwise removed) by Ofsted at the time of an inspection of the setting	being met To track the organisation's compliance with the Early Years Framework	Necessary for the performance of a contract to which the data subject is a party Necessary for the legitimate interests of the organisation		school. Until child is 25 years old for SEND records.
Safeguarding/ child protection information	To appropriate local authority and government bodies To the Chair of the committee To the committee Safeguarding Lead as appropriate To the setting DSL	To ensure the health, safety and well-being of children attending Pre-school To report on safeguarding and child protection concerns to the appropriate local authority bodies	Necessary for compliance with a legal obligation Necessary for the legitimate interests of the organisation	Impact on individuals' rights and freedoms is very low	Until child reaches the age of 25

Category of personal data	Disclosure recipients	Purpose of processing	Legal basis of processing	Assessment of employees' interests	Time limit for deletion
Health concerns of child attending setting	To setting staff as required for the stated purpose of processing	To ensure the health, safety and well being of children attending Pre-school	Necessary for the legitimate interests of the organisation	Impact on individuals' rights and freedoms is very low	Until 6 years after child leaves Pre-school