



KOOSA Kids Privacy Policy

Effective Date: 25th May 2018

Introduction

KOOSA Kids Ltd (Company No. 05426131, registered address 1 Priory Court, Tuscam Way, Camberley GU15 3YX) is committed to safeguarding your privacy. At all times we aim to respect any personal data you share with us, or that we receive from other organisations, and keep it safe. This Privacy Policy (“Policy”) sets out our data collection and processing practices and your options regarding the ways in which your personal information is used.

This Policy contains important information about your personal rights to privacy. Please read it carefully to understand how we use your personal data. We may update this Policy from time to time without notice to you, so please check it regularly.

The provision of your personal data to us is voluntary. However, without providing us with your personal data, you will be unable to use our services or apply for employment with us.

KOOSA Kids take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies with all UK national laws and requirements for user privacy.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

How to disable cookies

You may be able to configure your browser or our website, application, or service to restrict cookies or block all cookies if you wish, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies and instructions on how to adjust your browser settings to accept, delete, or reject cookies, see the Internet Advertising Bureau website www.youronlinechoices.co.uk.





Personal information

Whilst using our website, software applications or services, you may be required to provide personal information (name, address, email, account details, etc.). We will use this information to administer our website, applications, client databases and marketing material. We will ensure that all personal information supplied is held securely in accordance with the General Data Protection Regulation (EU) 2016/679, as adopted into law of the United Kingdom in the Data Protection Act 2018. Further, by providing telephone and email details, you consent to KOOSA Kids contacting you using that method. You have the right at any time to request a copy of the personal information we hold on you. Should you wish to receive a copy of this, or would like to be removed from our database, please contact us at info@koosakids.co.uk.

Information collection and use

1. We collect information about you:

(1) When you give it to us DIRECTLY

You may give us your personal data in order to register an account, make a booking, sign up to our newsletter or apply for employment with us; when you share information from our website on Facebook, Twitter or Instagram and/or via email or when you contact us by phone, email or post.

(2) When you give it to us INDIRECTLY

Your information may be shared with us by others including users of our services, partnering schools or local authorities. Your information will also be provided to us when you follow us or otherwise interact with us on Facebook, Twitter or Instagram.

(3) When you give permission to OTHER ORGANISATIONS to share it or it is AVAILABLE PUBLICLY

We may combine information you provide to us with information available from external publicly available sources. Depending on your privacy settings for social media services, we may also access information from those accounts or services. We use this information to gain a better understanding of you and to improve our communications.

(4) When you visit our WEBSITE

We use cookies to identify you when you visit our website and to enable us to personalise your online experience (for example by remembering your log in details). Please refer to our Cookies Policy above for details on the way our use of cookies affects your personal data.

2. What information do we collect?

We may collect, store and use the following kinds of personal data:

KOOSA Kids Ltd

1 Priory Court, Tuscam Way, Camberley, Surrey, GU15 3YX

t: 0845 094 2322 e: info@koosakids.co.uk

koosakids.co.uk

Company Registration No: 5426131





- (1) We will typically hold your name and contact details, including physical address, telephone number and email address, as well as personal details for any children you have registered with us. This may include special categories of personal data (e.g. health data) in-line with Ofsted requirements and/or to enable us to look after your children as best as possible whilst in our care. We would only collect sensitive personal data if there is a clear reason for doing so and will only do so with your explicit consent. We may request other information where it is appropriate and relevant, for example your bank or debit/credit card details or information relevant to customer surveys and/or offers.
- (2) Information about your computer and about your visits to and use of this website, including your IP address, geographical location, browser type, referral source, length of visit and number of page views.
- (3) Information about the services you use, services and products of interest to you or any marketing and/or communication preferences you give; and/or
- (4) Any other information shared with us as per clause 1

3. How and why will we use your personal data?

Personal data, however provided to us, will be used for the purposes specified in this Policy or in relevant parts of the website.

We may use your personal information to:

- (1) Enable you to use all of the services we offer
- (2) Send you information about the products or services we provide (this will not be done without your consent)
- (3) Provide you with the services, products or information you have requested
- (4) Improve your browsing experience by personalising your interaction with our website
- (5) Handle the administration of any payment you make via credit/debit card, standing order, BACS or Childcare Voucher transfer
- (6) Collect payments from you and send statements and/or receipts to you
- (7) Comply with safeguarding, prevent and/or other legal or regulatory requirements
- (8) Handle the administration of your employment application





- (9) Conduct surveys or customer research
- (10) Deal with enquiries and complaints made by or about you relating to the website or us in general
- (11) Audit and/or administer our accounts

4. Customer Profiling

Google Analytics

We may use some of your personal information to analyse our digital performance, for example to see how our website can be improved to help us achieve our business objectives, to record how you are using our website or to assess the popularity of our marketing campaigns.

For more information on how we use your personal information in relation to Google Analytics, please view our cookie policy above.

You can opt-out of the collection of information for such purposes here:

<http://www.aboutads.info/choices>

5. Communications and Marketing

Where you have provided us with appropriate consent, we will contact you by email and/or post with targeted marketing communications to let you know about our services which we consider may be of particular interest to you. We will never rent or sell on your data to any third-party companies and you can withdraw your consent to receive marketing communications at any time by clicking “unsubscribe” at the bottom of an email. You can also request to be removed from our marketing list by emailing info@koosakids.co.uk or by calling our office on 01276 21884.

6. Payments

All financial transactions carried out on our website are handled through Sage Pay, a third-party payment services provider. We recommend that you read Sage Pay’s privacy policy (available at <https://www.sagepay.co.uk/policies/privacy-policy>) prior to effecting any transactions with us. We will provide your personal data to Sage only to the extent necessary for the purposes of processing payments for transactions you enter into with us. We do not store your financial details.

7. Children’s Data

We process children’s data solely for the purposes of delivering our childcare services, in-line with Ofsted requirements, and strictly with your consent.

8. Disclosing Data for Other Reasons





In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, KOOSA Kids will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the company's legal advisers where necessary.

9. Security and Access to Your Personal Data

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction, misuse, alteration, unauthorised disclosure or access to your personal information.

Your information is only accessible by appropriately trained staff. We may also use agencies and/or suppliers to process data on our behalf. We may also partner with other organisations and in doing so transfer and/or acquire personal data.

Please note that some countries outside of the EEA have a lower standard of protection for personal data, including lower security requirements and fewer rights for individuals. We may transfer and/or store personal data collected from you to and/or at a destination outside the European Economic Area ("EEA"). Such personal data may be processed by agencies and/or suppliers operating outside the EEA. If we transfer and/or store your personal data outside the EEA, we will take reasonable steps to ensure that the recipient implements appropriate measures to protect your personal data.

Otherwise than set out in this Privacy Policy, we will only ever share your data with your informed consent.

10. Your Rights

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for direct marketing purposes or to be unsubscribed from our email list at any time. You also have the following rights:

- (1) Right to be informed – you have the right to be told how your personal information will be used. This Policy and other policies and statements used on our website and in our communications are intended to provide you with a clear and transparent description of how your personal information may be used.
- (2) Right of access – you can write to us to ask for confirmation of what information we hold on you and to request a copy of that information. Provided we are satisfied that you are entitled to see the information requested and we have successfully confirmed your identity, we have 40 days to comply. As of 25th May 2018, we will have 30 days to comply.





- (3) Right of erasure – as of 25th May 2018, you can ask us to delete your personal information from our records. Unless obliged by law or other regulations to keep your personal data for a period of time, we will do so.
- (4) Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for these records to be updated.
- (5) Right to restrict processing – you have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.
- (6) Right to data portability – to the extent required by the General Data Protection Regulations (“GDPR”) where we are processing your personal information (i) under your consent, (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contract or (iii) by automated means, you may ask us to provide it to you – or another service provider – in a machine-readable format.

To exercise these rights, please send us a description of the personal information in question using the contact details in section 16 below. Where we consider that the information with which you have provided us does not enable us to identify the personal information in question, we reserve the right to ask for (i) personal identification and/or (ii) further information.

Please note that some of these rights only apply in limited circumstances. For more information, please consult ICO guidance: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights>.

You are further entitled to make a complaint about us or the way we have processed your data to the Information Commissioner’s Office (“ICO”). For further information on how to exercise this right, please see the guidance at <https://ico.org.uk/for-the-public/personal-information>. The contact details for the ICO can be found here: <https://ico.org.uk/global/contact-us>.

11. Lawful Processing

We are required to have one or more lawful grounds to process your personal information. Five of these are relevant to KOOSA Kids:

1. **Consent** - We hold recent, clear, explicit, and defined consent for the individual’s data to be processed for a specific purpose.
2. **Contract** - The processing is necessary to fulfil or prepare a contract for the individual.
3. **Legal obligation** - We have a legal obligation to process the data (excluding a contract).
4. **Vital interests** - Processing the data is necessary to protect a person’s life or in a medical situation.





5. **Legitimate interests** - The processing is necessary for our legitimate interests. This condition does not apply if there is a good reason to protect the individual's personal data which overrides the legitimate interest.

(1) Consent

We will ask for your consent to use your information to send you electronic communications such as newsletters and marketing emails, for targeted advertising and profiling, and if you ever share personal information with us.

(2) Contractual Relationships

We will process your personal information so that we can enter contractual relationships with you to deliver our services or if you apply for employment with KOOSA Kids.

(3) Legal Obligations

We will be obliged to process your personal information to comply with legal or regulatory requirements from time to time. We will only ever do so when strictly necessary.

(4) Vital Interests

We will only ever process your personal information on the grounds of Vital Interests in a medical situation or to protect a person's life.

(5) Legitimate Interest

Applicable law allows personal information to be collected and used if it is reasonably necessary for our legitimate activities, as long as its use is fair, balanced and does not unduly impact individual's rights.

12. Data Retention

KOOSA Kids will not retain your personal information longer than necessary. We will hold onto the information you provide either while your account is in existence, or as needed to be able to provide the Services to you, or (in the case of any contact you may have with our customer service team) for as long as is necessary to provide support-related reporting and trend analysis only.

If legally required or if it is reasonably necessary to meet regulatory (i.e. Ofsted) requirements, resolve disputes, prevent fraud and abuse, or enforce our Terms and Conditions, we may also retain some of your information for a limited period of time as required, even after you have closed your account or it is no longer needed to provide the Services to you.

In the event that you ask us to stop sending you direct marketing /other electronic communications, we will keep your name on our internal suppression list to ensure that you are not contacted again.

13. Policy Amendments





KOOSA Kids keeps this Privacy Policy under regular review and we reserve the right to update it from time to time by posting an updated version on our website. We recommend you check this Privacy Policy occasionally to ensure you remain happy with it. We may also notify you of changes to our privacy policy by email.

14. Third Party Websites

Our website may contain links to other websites. This Privacy Policy does not cover external websites and we are not responsible for the privacy practises or content of those sites. We encourage you to read the privacy policies of any external website you visit via links on our website.

15. Updating Information

You can check the personal data we hold about you and ask us to update it where necessary by emailing us at info@koosakids.co.uk or by calling 0127 21884.

16. Contact

KOOSA Kids is not required by law to appoint a Data Protection Officer (DPO) but takes its data protection obligations seriously and has therefore appointed a member of staff to take on the responsibilities of a DPO.

If you have any queries or concerns about the way in which your data is being processed by us, please let us know by emailing the Data Protection Officer at info@koosakids.co.uk or by writing to us at:

KOOSA Kids Ltd
FAO the Data Protection Officer
1 Priory Court
Tuscam Way
Camberley GU15 3YX

