



## Data Protection and Privacy Policy

### **What is personal data?**

Personal data is described by the ICO as information that relates to an identified or identifiable individual.

What identifies an individual could be as simple as a name or a number or could include other identifiers such as an IP address or a cookie identifier, or other factors.

If it is possible to identify an individual directly from the information we process, then information may be personal data.

When considering whether information 'relates to' an individual, The Nature Box needs to consider a range of factors, including the content of the information, the purpose, or purposes for which we are processing it and the likely impact or effect of that processing on the individual.

Information which has had identifiers removed or replaced in order to pseudonymise the data is still personal data for the purposes of GDPR.

Information which is truly anonymous is not covered by the GDPR.

If information that seems to relate to a particular individual is inaccurate (i.e., it is factually incorrect or is about a different individual), the information is still personal data, as it relates to that individual.

### **GDPR set out seven key principles:**

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

### **Type of Data We Obtain**

At The Nature Box, we collect:

- Emergency contact details of parents and details of any other emergency contact.
- Parent and child's address
- Children's allergy and medical information
- Children's doctors' information
- Parents email address
- Booking information when making a booking through our online shop

### **Type of Data Obtained by our Website Payment Programme**

Our website is operated by Godaddy.co.uk. All payments are processed by Square.

Square obtains information about our customers on our behalf when a transaction is made. For example, when a customer makes a payment through our website or receives an invoice/receipt/refund. The particular Customer Data collected may include:

- **Device Information.** Information about our Customer's device, including hardware model, operating system and version, device name, country and language settings, unique device identifier, mobile network information, and information about the device's interaction with our Services.
- **Financial Information.** Bank account and payment card numbers.
- **Identification Information.** Customers' name; email address; mailing address; phone number; government-issued identification; or other historical, contact, and demographic information, and signature.
- **Location Information.** The location of our customer's device if they pay with Apple or Android Pay.
- **Transaction Information.** When our customers use our services to make or record payments to us, Square will collect information about when and where the transactions occur, the names of the transacting parties, a description of the transactions which may include item-level data, the payment or transfer amounts, billing and shipping information, and the devices and payment methods used to complete the transactions.
- **Use Information.** Information about how our customers transact with us, including access time, "log-in" and "log-out" information, browser type and language, country and language setting on your device, IP address, the domain name and location of our Customer's Internet service provider, other attributes about our customer's browser, mobile device and operating system, features our customer uses, and the date and time of use of the Services.
- **Other Information.** Information that our customers voluntarily provide us, or that we input into square's systems or Services about our Customers. For example, survey responses; participation in contests, promotions, or other prospective seller marketing forms or devices; suggestions for improvements; notes we take about our customers, or any other actions performed when they transact with you using Square.
- **Identification Information.** Our customers may also choose to provide identification information to Square such as their name, email address, or telephone number, which square links to a tokenized version of their payment card number.

#### **How we Obtain and Store data**

- We obtain this information to ensure ultimate safety and care of the children. Parents contact information is paramount to ensure that they can be contacted at any point.
- Children's allergy and medical information is required to ensure our staff team can provide the best care.

#### **Why we Obtain data**

- We obtain data to ensure the safety of children within our care.
- We obtain data to process payments, provide invoices and other services regarding payments.

#### **How long we keep data for**

- Children and parent's personal data is stored until the child leaves our setting. Records of incidents, accidents and medication are stored for 10 years and are stored securely.

#### **Sharing data with other agencies:**

#### **Data consent**

Consent means offering individuals real choice and control. Genuine consent should put individuals in charge, build trust and engagement.

- We ask people to positively opt in
- We do not use pre-ticked boxes or any other type of default content
- We use clear, plain language that is easy to understand
- We specify why we want the data and what we are going to do with it
- We give separate distinct options to consent separately purposes and types of processing.
- We name our organisation and any third-party controllers who will be replying on the consent
- We tell individuals they can refuse to consent without detriment

- We avoid making consent a precondition of a service

**Updating Personal Information**

The Nature Box will ask for an update of information every 6 months. This is to ensure accuracy of information to continue to keep children safe throughout their time with us.

**How do we keep data secure at The Nature Box?**

All electronic information is stored on a password protected hard drive which is only accessed by management. Paperwork is stored in a lockable cabinet in a lockable room.

**Staff members and GDPR**

All staff information is stored in a lockable cabinet in a lockable room. Staff are made aware of their GDPR rights in their contracts. We will ask staff to update their personal information every 6 months to ensure consistency and accuracy of information.

**Staff training and GDPR**

All staff have access to online training around the topic of GDPR.

**The right to withdraw data**

GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

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