



Data Processing as Processor

Effective date: 01/09/2025

Early Years Evaluation Smart Ltd. (“EYESmart”, “we”, “us”, “our”) act as processor and we process personal data on behalf of our customers. Our customers are the controllers of the personal data they upload or otherwise insert or arrange to be inserted into the EYESmart early childhood software (the “EYESmart Platform”). We process personal data on behalf of our customers in accordance with our [Data Processing Agreement](#), which forms part of our terms and conditions.

The purpose of this page is to give our customers’ end-customers insight into the processing activities performed by EYESmart. Please note that our customers are the controllers. As such they are responsible for answering any data subject requests, and they are responsible for informing the end-customers that EYESmart is acting as a processor.

Whose personal data is processed?

We process personal data of the following data subjects:

- Our customer’s employees using the EYESmart Platform
- Our customer’s end-customers, i.e. parents, guardians and other family members invited to have a profile on the EYESmart Platform (B2B)
- Our individual parent customers (B2C)
- The children in our customers’ care

What personal data is processed?

We process the personal data that our customers upload or otherwise insert into the EYESmart Platform. It varies how our customers use the EYESmart Platform, so the type of personal data collected will always depend on each individual customer. However, generally the processing includes the following:

- Child’s basic data (such as name, date of birth, birthplace, social security number, gender, languages, dietary considerations etc.)
- Child’s sensitive data (such as religion, ethnicity, allergies, vaccines, medicines, injuries/accident reports)
- Child’s attendance data (such as sick days, holidays, sign in/out data etc.)
- Child’s activity data (such as details of learning or development activity etc.)
- Photos and files which may be of or about children, employees, parents or guardians.

- Contact details (such as name, address, email address, phone number) of parents, guardians or other family members
- Financial information (such as bank account details, invoices etc.) of parents, guardians or other family members
- Employee details (such as name, address, email address, phone number, date of birth, qualifications and certificates, next of kin information etc.)
- Employee attendance data (sick days and holidays)
- Any personal data included in notes or shared in private or team messages via the EYESmart Platform.
- Any personal data shared with the EYESmart Customer Support or Customer Success teams
- Certain payer information (name, email, address, payment method, last 4 digits of card number, expiration date, one-time payment or future payment set up) and any documentation containing personal data in relation to payment disputes. This type of data is only processed if our customer provides their end-customer with the possibility to pay via the EYESmart Platform (in-app payment).

Who do we share it with?

We share it with certain sub-processors in order to be able to provide our services and the EYESmart Platform. This includes data centre services, backup services, tools to provide our customer support services, and other providers needed for certain specific features provided in the EYESmart Platform. A list of all the sub-processors can be found in the [Data Processing Agreement](#).

Is the personal data safely stored?

We strive to keep the personal data safe. We have in place technical and organisational security measures to ensure compliance with the GDPR and the UK GDPR. Those measures are set in place to prevent improper destruction, alteration, disclosure, access and other improper forms of processing of the personal data. Every year we get audited by external auditors to make sure our operations are in line with our Data Processing Agreement and security set up. You can find more information about the measures we have in place by reading our [Technical and Organisational Security Measures](#).

More information

For further information about the processing activities, please take a look at the [Data Processing Agreement](#). Please note that this is our standard agreement with our customers.