# **Peques Privacy Statement**

Peques Anglo-Spanish Nursery Schools is committed to protecting the confidentiality, integrity and security of your personal information and we take this responsibility very seriously. This privacy policy covers Peques Anglo-Spanish Nursery Schools' practices for collecting and processing information about its customers, prospective customers, employees, students/apprentices, website visitors and job applicants.

The data controller for information collected about you for Peques 1 (St John's Church) is Peques Leisure Ltd (Co. No. 3764546) and for Peques 2 (Fulham Baptist Church) is Peques World Nurseries Ltd (Co. No. 9485115). Both companies have registered offices at St John's Church, North End Rd, Fulham, London, SW6 1PB.

### Why we collect personal information?

We limit the collection of personal information to what is necessary to provide you with high quality services, to support your specific needs and requests, and to meet our business needs in connection with the services. Below we have highlighted the reasons for the collection of your personal information:

- To respond adequately to your requests for services or information
- To provide services to families that includes child care
- To provide employer services to all our employees, students and volunteers
- To provide a safe, healthy, and successful environment for those to whom we provide services
- To provide resource material/information regarding our services and areas of interest to our customers, such as parenting, child care, education, wellbeing, and work/life balance
- To aid in the administration of our services to our customers
- To administer first aid, emergency and other medical care, when necessary
- To comply with laws, and government regulations/standards
- To support our business purposes and functions related to the services, such as education, training, curriculum, communication, administration, and record-keeping
- To facilitate and process payments for the services
- To fulfil tax, reporting, and other financial requirements and obligations
- To administer employee payroll, tax/regulatory compliance and other record keeping
- To consider applications for employment and accredited education.

#### Consent for use of your personal information:

All clients, employees, students and volunteers will be asked to give written consent to authorise collection, use and disclosure of personal information for the purpose outlined in this privacy policy. In light of the nature of our services, as well as applicable laws and regulatory requirements, if you choose to withhold some types of personal information or opt out of providing it, we may not be able to provide the services requested.

### The personally identifiable information we collect:

We typically collect personal information about our clients, employees, students and volunteers through the registration and recruitment process.

This personally identifiable information may include:

#### Clients

- [Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.]
- [Date of birth.]
- [Gender.]
- [Marital status and dependents.]
- [Next of kin and emergency contact information.]
- [Start date.]
- [Location of services provided.]
- [CCTV footage and other information obtained through electronic means.]
- [Photographs and videos]
- [Payment details]
- [Allergies and special dietary requirements]

- [Special needs and health information]
- [Emergency contact details for doctors]
- [Records created during the course of providing service to you or your dependents such as notes on the activities, behaviours, illnesses, medication, food, etc.; photographs, videos, CCTV; and other documentation records.]
- [Information about your race or ethnicity]

### Prospective clients

- [Personal contact details such as name, addresses, telephone numbers, and personal email addresses.]

#### Employees, students and volunteers

- [Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.]
- [Date of birth.]
- [Gender.]
- [Marital status and dependants.]
- [Next of kin and emergency contact information.]
- [National Insurance number.]
- [Bank account details, payroll records and tax status information.]
- [Salary, annual leave, pension and benefits information.]
- [Start date.]
- [Location of employment or workplace.]
- [Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).]
- [Information about criminal convictions and offences.]
- [Employment records (including job titles, work history, working hours, training records and professional memberships).]
- [Remuneration history.]
- [Performance information.]
- [Disciplinary and grievance information.]
- [CCTV footage and other information obtained through electronic means.]
- [Photographs and videos]
- [Emergency contact details for doctors]
- [Information about your race or ethnicity]

## **Sharing personally identifiable information**

Peques Anglo-Spanish Nursery Schools considers your personal information confidential and does not share it with others except as described in this privacy policy. There are limited circumstances that require Peques Anglo-Spanish Nursery Schools to disclose your personal information to others in order to deliver services or to meet necessary business purposes. We may disclose your information, as necessary to the following:

- To your Employer: Peques Anglo-Spanish Nursery Schools services are often made available to you as a benefit through employer-sponsored programs. In order to meet our obligations to your employer, Peques Anglo-Spanish Nursery Schools will provide details of your use of the services to your employer, which may include your name, dates of use, reasons for use, and other available details. We will disclose only information relevant to the utilization of the services.
- <u>For Business Transfers</u>: As we continue to develop our business, we might sell or buy assets. If any Peques Anglo-Spanish Nursery Schools business unit is sold or substantially all of Peques Anglo-Spanish Nursery Schools is acquired, personal information relevant to the operation sold could be transferred as part of the transaction.
- <u>To Meet Legal Requirements</u>: We may share personally identifiable information with law enforcement or other government entities as required by law/regulations or as we reasonably determine to be necessary to protect our rights or the rights of others, to prevent harm to persons or property, to fight fraud, or to enforce our web site terms of use.

### How can individuals update their personally identifiable information?

Peques Anglo-Spanish Nursery Schools is committed to collecting personal information that is accurate,

complete, current and reliable for its intended use. It is the responsibility of the data subject to inform the relevant setting of any changes to the personal information that is held about them and it is the responsibility of the data controller to update this information once informed.

The data subject can request to withdraw consent for their personal identifiable information held by the company at any time as long as this does not affect the ability to provide the service or employment to the subject.

### Subject access request

It is your legal right as a data subject to have access to any personally identifiable information that Peques Anglo-Spanish Nursery Schools holds about you. Should you want access to such information then you will need to ask the manager for a Peques Anglo-Spanish Nursery Schools' Data Subject Request Form and then complete it and send it to the attention of the Managing Director, Peques Anglo-Spanish Nursery Schools Head Office, St John's Church, North End Rd, Fulham, London, SW6 1PB. The company will endeavour to provide an audit of all personally identifiable information held within thirty days of the request. Should the request be deemed excessive then a fee may be charged and an extended time frame agreed.

### **Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to authorised personnel and third parties that we are obliged to by law.

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.

### **Electronic Information**

We store all our electronic identifiable information on password protected desktop computers accessible to authorised personnel only, and on internet clouds via our nursery management software called "Instant Nursery Manager" and on our on-line Learning Journal software called "Tapestry". Both software systems are password protected and operate their clouds in the UK regulated by EU law. Privacy Policies for both software companies is available on request to the Peques administrator.

We do not use USB memory sticks or other portable drives to store, transfer or share personal identifiable data as this is deemed as a high security risk.

## **Hardcopy Information**

The hardcopy of personal information we collect will remain in a locked facility at the setting where you receive the services or provided the information and accessible to authorised personnel only.

#### **Data Retention**

We will only retain your 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. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a client, employee, worker, student or volunteer of the company we will retain and securely destroy your personal information in accordance with the company's retention periods.

#### **Data Protection Officer**

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact them in writing at <a href="mailto:data@peques.co.uk">data@peques.co.uk</a> or by post at Peques Anglo-Spanish Nursery Schools Head Office, St John's Church, North End Rd, Fulham, London, SW6 1PB.

Peques is a registered member of the Information Commissioners Office (ICO) which is the UK supervisory authority for data protection issues. You have the right to make a complaint at any time to the ICO which you can do via their website <a href="https://www.ico.org.uk">www.ico.org.uk</a>.