

PRIVACY POLICY

Last updated: 10th December 2019

Introduction

THATNURSERYLIFE LTD (the “data controller”) takes the privacy of users’ personal information very seriously and is committed to safeguarding their privacy and personal information, complying with the Data Protection Act 2018, the Privacy & Electronic Communications Regulations 2003 and the EU General Data Protection Regulations. This policy relates to all the data controller’s business activities as it pertains to the collection and processing of any personal information collected from users directly or via third party data providers. It covers individuals who:

- Visit the website known as thatnurserylifecom, or any sub-site or pages therein
- Use any of our products or services
- Contact us about our products, services, or content
- Have requested to be contacted by us in relation to recruitment opportunities, newly published content, opportunities to contribute or general updates about our products and services
- Apply for employment with the data controller

This policy will explain the following:

- What personal information may be collected about users
- How the data controller will use such information
- When the data controller may use such information to contact you
- How long the data controller will retain such information
- Under what circumstances such information may be shared with third parties
- The steps taken to keep such information secure
- User’s rights regarding the information collected and stored
- The use of cookies on websites operated by the data controller
- How the data controller can be contacted

For the purposes of clarity, where this policy refers to “personal information” this means information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data or digital identifier being matched to one or more factors to their physical, physiological, genetic, mental, economic, cultural or social identity.

Information that you provide to us

The data controller collects personal data as a result of various of its activities. These activities are listed below and are accompanied by an explanation of what data collected and the lawful basis on which such data is processed.

1. Registered users on our website

Users of thatnurserylife.com have the opportunity to register for a free user account. In doing so the data controller collects personal information including name, email address, job title, employer name and a profile photograph. This personal information is used:

- To meet its obligations arising from a user's use of our product or services. The lawful basis for processing data for this purpose will be "Contractual Need".
- To send users personalised communications which they have requested (through the "Communication Preferences" on their user profile) or which may be of interest to them. Such communications may relate to information on newly published content, new features on the website, new job opportunities available for applications, notifications of important dates and information on opportunities to contribute to the website. The lawful basis for processing data for this purpose will be "Legitimate Interest" and/or "Consent"
- To communicate with users in order to encourage their regular use of the website. A third-party tool is used to facilitate the automation of this activity with no significant effect on users' rights. The lawful basis for processing data for this purpose will be "Legitimate Interest" and/or "Consent"

2. Registered recruiters on our website

Users of thatnurserylife.com who have created a free user account have the option to additionally register themselves as a Recruiter. In doing so, they self-identify as a user who may wish to purchase the data controller's related products or services. The data controller collects additional information when a registered user further signs up as a Recruiter including the size of their organisation, the Ofsted registration number of their organisation and their organisation's logo. This additional personal information is used:

- To provide an accurate quotation for the cost of related products or services. The lawful basis for processing data for this purpose will be "Legitimate Interest"
- To pre-populate information on job vacancy adverts the user may create. The lawful basis for processing data for this purpose will be "Legitimate Interest"

3. Registered job seekers on our website

Users of thatnurserylife.com who have created a free user account have the option to additionally register themselves as a Job Seeker. In doing so, they self-identify as a user who is actively seeking a new employment opportunity. The data controller collects additional information when a registered user further signs up as a Job Seeker including a copy of their CV, qualification information, salary information and a contact telephone number. This additional personal information is used:

- To assist the data controller in presenting job opportunities which are most likely to be of interest to the user. The lawful basis for processing data for this purpose will be "Legitimate Interest"
- To share with recruiters in third party organisations when a user applies for a vacancy they are promoting. The lawful basis for processing data for this purpose will be "Consent"

4. Individuals who apply to work for the data controller

When an individual applies to work for the data controller, personal information including name, email address, postal address, telephone number, employment history, education history and referee details will be collected. This personal information is used:

- To assess the suitability of applicants for the role in question. The lawful basis for processing data for this purpose will be “Consent”
- To arrange and complete the interview and other selection processes, including communication about arrangements and background checks as permitted by law. The lawful basis for processing personal information for this purpose will be “Consent”

5. Current and former employees of the data controller

Personal information is collected from the employees of the data controller and retained when employees cease their engagement with the data controller. This personal information includes name, email address, postal address, telephone number, date of birth, banking details, national insurance number, copies of official documents and the contact details of emergency contacts. This personal information is used:

- To enable the correct and lawful employment and management of employees. The lawful basis for processing data for this purpose will be “Contractual Need”
- To contact third parties, who have been identified for this purpose, in the case of an emergency related to an employee’s time at work. The lawful basis for processing data for this purpose will be “Vital Interests”
- To comply with applicable tax, employment and health & safety laws. The lawful basis for processing data for this purpose will be “Public task”.

Information provided to us by third parties

1. Un-registered users on our website

Where a user accesses thatnurserylife.com but does not sign up for, or log into, a user account, they are considered to be an un-registered user. In this case, data is collected by a third-party service – Google Analytics – and subsequently provided to the data controller. Very little personal information about such users but an IP address, browser type, ISP and operating system information will be. Additionally, the data collector may from time to time use a third-party service – HotJar- to collect and provide screen-recordings of user activity on the website. It is unlikely that such information will be personally identifiable information, but in the event that it is, the lawful basis for processing such information will be “Contractual Need” It should be noted that this information is collected about all users accessing the website, including registered users. The lawful basis for processing this information in relation to registered users – where it is more likely to be personally identifiable – is also “Contractual Need”

How long is personal information retained?

Personal information related to those using our website and accessing our products or services will be kept as long as it is needed to be used by us in relation to our obligations. Data is retained for up to 5 years after a user’s last interaction with the website in order to provide continuity of service should the user re-engage subsequently.

Personal data as it relates to current or former employees will be retained for as long as the law requires it to be retained.

How will personal information be shared?

Some personal information will be shared between the data controller and third-party suppliers of services and tools. These relationships, and the current third parties involved are as follows:

- Hosting of thatnurserylife.com; Bluehost
- User management and engagement; Intercom
- Website visitor analytics; Google Analytics
- Payment processing; Stripe
- Accountancy; Prasinus Limited

In the course of sharing information with some of these partner organisations, it may be necessary for data to be transmitted and/or stored at a destination outside of the European Economic Area (EEA). Where this is the case, the data controller will require a data processing agreement which safeguards the storage and use of data in accordance with the Data Protection Act. No third party is permitted to use personal information shared with them by the data-controller for their own marketing or promotional purposes, or any purpose other than those explicitly required by the data controller.

In certain, limited circumstances the data controller may disclose personal information if required to do so by law, or whilst acting in good faith and believing such a disclosure to be necessary in order to:

- Meet legal obligations or to comply with legal actions served upon the data controller such as a warrant for search or a subpoena
- Protect and/or defend the rights and/or property of the data controller
- Act under extraordinary circumstances to protect the personal safety or wellbeing of user or other member of the public

How is personal data kept secure?

The data controller is committed to protecting the security of all personal information. A range of security technologies and processes are deployed to prevent unauthorised access and/or disclosure. Servers storing personal data are housed in secure, controlled environments with strict access control systems in place. The transmission of data between servers and user's computers is encrypted using the SSL protocol. Although all reasonable steps are taken to secure personal data, the data controller can not offer any warranty or promise that data is secure; all transmission of data from users to our website is at their own risk.

What choices can a user make about their information?

Any user can review, edit or request the deletion of any personal information held about them by the data controller at any time, and without charge, by contacting the data controller in writing or by email. In addition, the following specific rights and choices are provided by law:

- The right to view a copy of all personal data held by the data controller, free of charge
- The right to have corrections made to inaccurate personal data by the data controller, free of charge
- The right to withdraw or amend consent for the processing of personal data where this is the lawful basis for such processing. This includes consent to be contacted, which can be adjusted directly in the user profile page of the website.
- The right to have personal data deleted by the data controller, provided it is not needed for contractual, legal or public duty reasons, free of charge

Use of cookies

The data controller makes use of cookies to help manage the website, and to aid in the smooth and effective experience of users. The cookies used may be session cookies, or persistent cookies, depending on their function.

The cookies used on the website can be divided into the following 4 categories:

- **Strictly Necessary Cookies:** These are essential to the operation of the website, such as those which grant a logged-in user access to restricted areas of the website. Without these cookies, the website would fail to operate correctly. These cookies do not gather information about a user which could be used for marketing, or to track user behaviour on the internet. Cookies in this category can not be disabled.
- **Performance Cookies:** These are designed to collect information about a user's behaviour on the website, such as which pages are visited most often. These cookies do not gather information which can identify an individual user but operate in aggregate to improve how the website works. Without these cookies the data controller is unable to learn more about the website's operation in order to make continuous improvements.
- **Functionality & Profile Cookies:** These remember choices individual users make on the website, such as their username, general location and content of particular interest. They may also be used to provide services on the website which a user has asked for, such as leaving a comment on piece of content. Although these cookies may be able to be linked to a user's identity, they are not able to track browsing activity on websites which are not operated by the data controller. Without these cookies the website can not remember previous choices or customize the browsing experience for a user.
- **Targeting Cookies:** These are generally served by third-party service providers such as Google Ads and are used to gather information about users browsing habits across many different websites. For example, one of these cookies might identify that a user has visited the website, and subsequently cause the displaying of a related advert on a different website ("retargeting"). Although these cookies track behaviour widely, they are not usually able to personally identify users.

Complaints, changes to policy & contact details

All users and members of the public have a right to complain about the data controller to the UK's Information Commissioner's Office (www.ico.org.uk)

This policy will be updated from time to time, without users necessarily being specific notice of a change. The data controller advises all users to regularly review the policy for any changes in how their personal data is collected, stored or processed.

The data controller can be contacted by post at the company's publicly available registered address, or by emailing team@thatnurserylife.com with "FAO Data Protection Officer" in the subject line.