

# Cranford Data Protection & Privacy Policy

## Introduction

Cranford Nursery School needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the nursery has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the nursery's data protection standards.

## Why this policy exists

This data protection policy ensures Cranford Nursery School:

- Complies with data protection law and follows good practice.
- Protects the rights of staff and customers.
- Is open about how it stores and processes individual's data.
- Protects itself from the risks of a data breach.

## Data Protection law

The General Data Protection Regulation 2018 describes how organisations – including Cranford Nursery School must collect, handle and store information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

Eight important principals underpin the Data Protection Act. These say that personal data must:

1. Be processed fairly and lawfully.
2. Be obtained only for specific lawful purposes.
3. Be adequate, relevant and not excessive.
4. Be accurate and kept up to date.

5. Not be held for longer than necessary.
6. Processed in accordance with the rights of data subjects.
7. Be protected in appropriate ways.
8. Not be transferred outside the European Economic Area (EEA) unless that country or territory ensures an adequate level of protection.

## People, Risks and Responsibilities

### Policy Scope

This policy applies to:

- The Head Office of Cranford Nursery School.
- All staff and volunteers of Cranford Nursery School.
- All contractors, suppliers and other people working on behalf of Cranford Nursery School.

It applies to all the data that the company holds relating to identifiable individuals, even if that information technically falls outside the General Data Protection Regulation Act 2018. This can include:

- Names on individuals.
- Postal addresses.
- Email addresses.
- Telephone numbers.
- Plus any other information relating to individuals.

### Data Protection Risks

This policy helps to protect Cranford Nursery School from very real security risks, including:

- **Breaches of Confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how the company uses data relating to them.
- **Reputational Damage.** For instance, the company could suffer if hackers successfully gained access to sensitive data.

### Responsibilities

Everyone who works for or with Cranford Nursery School has some responsibility for ensuring data is collected, stored and handled appropriately.

Key areas of Responsibility.

Fiona Harcourt is ultimately responsible for ensuring Cranford Nursery School meets its legal obligations.

### General Staff Guidelines

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally.
- Cranford Nursery School will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure by taking sensible precautions.
- In particular, strong passwords must be used and they should never be shared.
- Personal data should not be disclosed to unauthorised people, either within the company or externally.
- Data should be regularly reviewed and updated. If no longer required it should be deleted.
- Employees should request help if unsure about any aspect of data protection.

### Data Storage

These rules describe how and where data should be safely stored.

- Questions about storing data safely can be directed to the manager.
- When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it.
- These guidelines also apply to data that is usually stored electronically but has been printed.

- When not required paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are not left where unauthorised people could see them.
- Data printouts should be shredded when no longer required.
- When data is stored electronically it must be protected from unauthorised access, accidental deletion and malicious hacking attempts.
- Data should be protected by strong passwords that are changed regularly and not shared amongst employees.
- If data is stored on removable media it should be kept locked away securely.
- Data should only be stored on designated drives and servers and should only be uploaded to an approved cloud service.
- Servers containing personal data should be sited in a secure location away from office space.
- Data should be backed up frequently.
- Data should never be saved directly on laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by approved security software and a firewall.

## Data Usage

Personal data is of no use to Cranford Nursery School unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data employees should ensure the screens of their computers are locked when left unattended.
- Personal data should not be shared informally, in particular it should not be emailed.
- Data must be encrypted before being transferred electronically.

- Personal data should never be transferred outside the European Community.
- Employees should not save copies of personal data on their own computers.

### Data Accuracy

The law requires Cranford Nursery School to take responsible steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort Cranford Nursery School should put in ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure data is updated.
- Cranford Nursery School will make it easy for data subjects to update the information Cranford Nursery School holds about them.
- Data should be updated as inaccuracies are discovered. i.e. old phone numbers should be removed.

### Subject Access Requests

All individuals who are the subject of personal data held by Cranford Nursery School are entitled to:

- Ask what information the company holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the company is meeting its data protection obligations.

If an individual contacts Cranford Nursery School requesting this information this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller, [cranfordnursery@yahoo.com](mailto:cranfordnursery@yahoo.com) The data

controller can supply a standard request from although individuals do not have to use this.

The data controller will aim to provide the relevant data within 14 days.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

#### 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 Cranford Nursery School will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.

#### Providing information

Cranford Nursery School aims to ensure that all individuals are aware that their data is being processed and that they understand:

- How the data is being used.
- How to exercise their rights.

To these ends, the company has a privacy statement setting out how data relating to individuals is used by Cranford Nursery School.

A version of the statement is available on the company website.

#### Privacy Policy

Effective date: August 16, 2018

Cranford Nursery School ("us", "we", or "our") operates the <http://www.cranfordnurseryschool.co.uk/> website (the "Service").

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. This Privacy Policy for Cranford Nursery School is powered by [FreePrivacyPolicy.com](http://FreePrivacyPolicy.com).

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <http://www.cranfordnurseryschool.co.uk/>

#### Information Collection And Use

We collect several different types of information for various purposes to provide and improve our Service to you.

#### Types of Data Collected

##### Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address

##### Usage Data

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic

##### Use of Data

Cranford Nursery School uses the collected data for various purposes:

- To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer care and support

- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues

#### Transfer Of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Isle of Man and choose to provide information to us, please note that we transfer the data, including Personal Data, to Isle of Man and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Cranford Nursery School will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

#### Disclosure Of Data

#### Legal Requirements

Cranford Nursery School may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Cranford Nursery School
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

#### Security Of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage

is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

#### Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

#### Links To Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

#### Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

#### Changes To This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

#### Contact Us

If you have any questions about this Privacy Policy, please contact us:

By email: [cranfordnursery@yahoo.com](mailto:cranfordnursery@yahoo.com)

By phone number: 01624676086