

# Privacy Policy

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## 1. Important notice

When you visit our website, we collect certain basic information and we recognise the importance of keeping this data secure.

This Privacy Policy sets out the basis by which any personal data we collect from you, or that you provide to us, will be processed by us. It describes who has access to this data and what your rights are. We are the “controller” of the data you provide to us.

Please read this Privacy Policy carefully to understand our practices regarding your personal data and how we will treat it.

You have the right to object to us processing your personal data for certain reasons – you can read more about this in the “Your rights” section of this policy.

*This policy only applies to our website. If you leave our site, we encourage you to read the privacy statements on the other websites you visit, as they will govern the use of any personal data you provide when visiting those websites.*

## 2. Information we may collect and why

Personal data is any information which identifies you personally, whether that be directly (for example, your name) or indirectly (for example, information about your use of our products and services).

We may collect and process the following data about you:

- **If you contact us** by email, letter, telephone, through our website or by submitting a comment on our site, or by any other means, we may keep a record of that correspondence;
- **Survey responses:** we may ask you to complete surveys for research purposes although you do not have to respond to them;

- **Your contact details** such as your name, email address and telephone number so that we can contact you in response to an enquiry you make through our website, by submitting a comment on our site, or in relation to the products and services that we have agreed to provide to you;
- **Transaction details:** we or our third-party providers will collect information relating to the transactions you undertake through our website and for the purposes of fulfilling your orders;
- **Details of your visits to our website** including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

### 3. Cookies

#### a) What are cookies?

When you visit our website, we collect information about how you have used our site through cookies. Cookies are small files which are stored on your computer, tablet or smartphone. They are designed to help websites remember who you are and other information about your visit.

#### b) What cookies are used on this website?

The types of cookies we and our business partners use on our website are broadly grouped into the following categories:

**Essential** – Some of the cookies on our website are necessary to be able to provide you with a service you have requested. An example of this could be a cookie used to enable you to log into your account on our website. You may not be able to use our site without these cookies.

**Analytics** – We use analytics cookies to provide statistics on how our website is used and to understand how visitors engage with it. An example is counting the number of different people coming to our site. We would find it difficult to analyse how well our website was performing and improve it without using these cookies.

**User** – We use these cookies to remember you the next time you visit our website, enabling us to personalise your experience so that it matches your interests.

**Social sharing** – We use third-party cookies to allow you to share our content on social network sites like Facebook. More information about this can be found in our “Third Party Cookies” section below.

**Interest-based advertising** – To try and ensure that the adverts you see on a website are relevant to you, third-party cookies may be used to collect information about your interests. Having these cookies does not increase the number of adverts you will see, but does make the adverts more relevant to you.

### **c) How can I reject or opt out of receiving cookies?**

You may refuse to accept cookies by activating a setting on your browser. However, if you select this setting, you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

For more information about cookies and how to stop cookies being installed or how to delete existing cookies from your hard drive visit: <http://www.allaboutcookies.org>.

### **d) Third party cookies**

Some of the cookies described in section 3B are stored on your machine by third parties when you use our website. Third parties may also read cookies on your browser to collect information or to provide content/ advertisements to you. We have no control over these cookies or how these third parties use them. They are used to allow that third party to provide a service to us, for example, site analytics. For more information on these cookies and how to disable them, please see:

- Internet Advertising Bureau website at <http://www.youronlinechoices.com/> where you will be able to opt out of receiving interest-based advertising cookies from some third parties; and/or
- If you want to know more about how cookies work and how to manage or delete them, visit the [World Wide Web Consortium's website](#).

## **4. How we use your personal data**

We use your personal data for the following:

- To provide you with the products and services you have requested from us as a new or returning customer;
- To communicate with you about the products and services that we provide, including letting you know about major changes to those products and services or any related information;
- For direct marketing purposes (including by third parties) - if you have provided your consent or we otherwise have the right to do so, we may use your details to send you direct marketing and to keep you informed of promotional offers by email, SMS, post or telephone relating to our products and services;
- To track your usage of our website, communications, products and services - we use cookies and other technologies to track your activity on our website so that we can monitor its usage and provide you with a more personalised experience.
- To provide and improve customer support - for example, where you have questions about our products and services;
- To maintain our records and improve the accuracy of our data - we process personal data in the course of maintaining and administering our internal records; this includes processing your personal data to ensure that the information we hold about you is kept up to date and accurate;

- To respond to enquiries, complaints and/or to deal with any disputes in the most effective manner, which may arise in the course of us providing our products and services to you;
- In certain circumstances to investigate, detect and prevent fraud and comply with our legal obligations. This may require us to provide your personal data to law enforcement agencies if they request it.

*Please note that you have the right to unsubscribe from our direct marketing at any time by clicking the “Unsubscribe” link in any of our emails or by contacting us and asking to be removed from our direct marketing list.*

## **5. Legal grounds for processing**

Data protection law requires us to only process your personal data if we satisfy one or more legal grounds, such as gaining your consent or if it is necessary for the performance of a contract.

In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

The Early Years Foundation Stage (Welfare Requirements) Regulations 2012 place a legal obligation upon us to collect and process certain information. In these circumstances, we do not require your consent to collect this information as we have a fair and lawful reason for doing so.

## **6. Who we share your personal data with**

The information that you provide to us, whether mandatory or voluntary, will be regarded as confidential. We do not share information about you with anyone without consent unless the law and our policies allow us to do so. This may be necessary, for example, in order to comply with any legal obligation or in order to protect the rights, property or safety of our business, our customers or others. This includes, in specific cases, exchanging information with other organisations for the purposes of fraud protection.

We routinely share information without consent with:

- schools that children attend after leaving us;
- our local authority for the purposes of the Early Education Entitlement for 2, 3 and 4-year-olds and the Early Years Census;
- the Department for Education (DfE) as part of statutory data collections.

We are obliged to share confidential information without authorisation from the person who provided it, or to whom it relates, when:

- there is evidence that a child is suffering, or is at risk of suffering significant harm;
- There is reasonable cause to believe that a child may be suffering, or is at risk of suffering, significant harm;
- It is to prevent significant harm arising to children, young people or adults, including the prevention, detection and prosecution of serious crime.

We may also provide your personal data to our suppliers and service providers, including other companies in our group, who provide certain business services for us and act as “processors” of your personal data on our behalf.

In some cases, the personal data we collect from you may be transferred outside the European Economic Area (EEA) and such destinations may not have laws which protect your personal data to the same extent as in the EEA. We and our processors are required by law to ensure that, where this happens, your personal data is treated securely and is protected against unauthorised access, loss or destruction, unlawful processing and any processing which is inconsistent with the purposes set out in this Privacy Policy.

## **7. How long we keep your personal data for**

We keep your personal data no longer than is necessary for the purpose(s) for which it was provided. When determining the retention periods relevant to different types of data, we take into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- the statute of limitations under applicable law;
- potential or actual disputes; and
- guidelines issued by relevant data protection authorities.

Otherwise, we are obliged to securely erase your personal data from our systems when it is no longer needed.

## **8. Your rights**

Under data protection legislation, you have the right to request access to information that we hold about you.

You also have the right to:

- object to the processing of personal data that is likely to cause, or is causing, damage or distress;
- withdraw consent where given;
- prevent data processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of data protection regulations.

If you have a concern about the way we are collecting or using your personal data, please feel free to contact us by using the details set out on our website.

If you are not satisfied with our response to any enquiries or complaint or believe our processing of your personal data does not comply with data protection law, you can make a complaint to the Information Commissioner’s Office (ICO) in the following ways:

- In writing to the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF;
- By calling 0303 123 1113;

- By visiting the ICO website at <https://ico.org.uk/concerns/>

## **9. Links to other websites**

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **10. Changes to this Privacy Policy**

This Privacy Policy was last updated on 12th September 2018.

Any changes we may make to our Privacy Policy in the future will be posted on this page. However, we advise that you check this page regularly to keep up to date with any necessary changes.