

# PRIVACY AND COOKIES POLICY

## JUST FOR FUN HOLIDAY CLUB LIMITED PRIVACY NOTICE FOR PARENTS

### 1 INTRODUCTION

1.1 We are committed to protecting and respecting your and your child's privacy. Just for Fun Holiday Club runs children's daytime activities camps across Wiltshire. In this privacy notice, references to "we", "us", "our", or "Just for Fun Holiday Club" is a reference to Just for Fun Holiday Club Limited and the activity camp which your child is attending, may be attending, or has attended.

1.2 This privacy notice sets out the basis on which any personal data we collect from you or your child, or that you provide to us, is handled by us. We also have a privacy notice addressed to your child. This is available on our website.

1.3 Please read the following carefully to understand our views and practices regarding your and your child's personal data and how we will treat it.

1.4 For the purposes of the General Data Protection Regulation 2016/679 ("GDPR"), we are the data controller and our trading address is 27-28 Commercial Road, Swindon SN1 5NS.

1.5 If you are reading this privacy notice online, we recommend that you print and retain a copy for future reference.

### 2 INFORMATION WE COLLECT ABOUT YOU AND YOUR CHILD

Information you give us

2.1 You may give us personal data about you or your child, in several ways; these include:

2.1.1 using, visiting or interacting with our website (such as filling out forms or registering on our website);

2.1.2 visiting one of our activity camps;

2.1.3 corresponding with us by phone, e-mail or post; and

2.1.4 sending information directly to us, for example when paying our fees, giving us medical records or information about your child's health, completing activity camp registration forms, signing up to our terms and conditions or providing information as requested by us and/or which is necessary from time to time.

2.2 The information you give us may include the following information about you and / or your child:

2.2.1 full name;

2.2.2 gender;

2.2.3 date of birth;

2.2.4 contact details (including home address, e-mail address, and mobile, home and/or work phone number);

2.2.5 parent login information (i.e. username and password) for the website;

2.2.6 financial and credit card information;

2.2.7 education and health records (including special education needs, medical or physical conditions and/or accidents);

2.2.8 current registered doctor's surgery;

2.2.9 family circumstances (including your relation to the child); and

2.2.10 which camp site(s) your child visited.

Technical information we collect about you when you visit our website.

2.3 With regard to each of your visits to our website we may automatically collect the following information:

2.3.1 technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform; and

2.3.2 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.

2.4 Our website may contain links to and from the websites of our partner networks, advertisers, suppliers 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.

Information we receive from other sources.

2.5 We may be working closely with third parties (including, for example, your child's current school, medical practitioners, photographers, local authorities, education authorities, business partners, payment and delivery services, debt collectors, lawyers, and credit reference agencies) and may receive information about you from them.

2.6 We may also use CCTV footage to ensure the activity camp is safe. We may receive information about you if you use any of the other websites we operate or the other services we provide.

### **3 COOKIES POLICY**

3.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them, please see our cookie policy.

## **4 CONTACT US**

4.1 Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to the Just for Fun Holiday Club Data Protection Co-Ordinator at [info@justforfunholidayclub.co.uk](mailto:info@justforfunholidayclub.co.uk) or write to us at Just for Fun Holiday Club, 27-28 Commercial Road, Swindon SN1 5NS.

## **5 USES MADE OF THE INFORMATION**

Information you give to us.

5.1 We will use the information you give to us to pursue the following legitimate interests:

5.1.1 to provide daytime activities for your child;

5.1.2 to protect the welfare of your child and to promote the objects and interest of Just for Fun Holiday Club and the Active Learning Group;

5.1.3 to store this information on our chosen management information system;

5.1.4 to manage any queries or disputes you or your child may have with us or that we have with you or your child;

5.1.5 to enforce our terms of use with you or any other contract we may have with you;

5.1.6 where your child is attending or has attended one of our daytime activity camps, to provide you with information about other similar services (for example, summer camps) that we offer as part of extra-curricular experiences and overall development of your child; and

5.1.7 to send out surveys to you by email or SMS in order for you to provide feedback to us on our daytime activity camps.

5.2 In order to pursue the legitimate interests referred to in paragraph 5.1 we rely on software applications and other technology to process personal data about you and your children. This includes our management information system. The third parties we use to deliver these applications are carefully chosen and vetted by us to ensure that, among other things, your and your child's personal data is kept secure. For further information on the kind of technology we use, please contact our Data Protection Co-Ordinator.

5.3 We will also use the information you give to us as is necessary to carry out our obligations arising from the contract (or potential contract) between you and us and to provide you with the information and services that you request from us. For example, we will provide daytime activity camps for your child and will use personal data where necessary to deliver this service. We will also use your personal information to invoice you for our services pursuant to the contract between you and us. We will also require a certain amount of personal information about you and your child at the registration stage.

5.4 Inevitably, there will be an overlap between what we do that is necessary to (a) perform our contract with you and (b) pursue a legitimate interest although we have tried our best to demarcate these as set out above. If you have any questions about these please contact our Data Protection Co-Ordinator.

Information we collect about you from our website.

5.5 We will use this information for the following legitimate interests:

5.5.1 to contact you if you have made an enquiry to us directly or via our online enquiry form and/or to inform you about available places at the camp in the future;

5.5.2 to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

5.5.3 to improve our website to ensure that content is presented in the most effective manner, and your online experience is as effective and appropriate as possible, for you and for your computer; and

5.5.4 as part of our efforts to keep our website safe and secure.

Information we receive from other sources.

5.6 We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out above (depending on the types of information we receive).

5.7 Also, health practitioners may provide us with information (particularly sensitive personal data) about your child which may need to be added to our medical, special educational needs or child protection file. This kind of processing of sensitive personal data may be necessary (a) for medical diagnosis or provision of health care and/or (b) to protect the vital interests of your child or another person taking into account the mental and physical capacity of your child.

5.8 In order to achieve the purposes described in paragraph 5.7, we may do the following:

5.8.1 keep a list of your child's allergies or medical requirements in case of emergency. It is necessary for the camp to have a list readily available to our staff so that we are able to look after your child promptly in the event of a medical emergency; and

5.8.2 rely on software applications and other technology to process medical information (such as allergies, accident's and injuries) about you and your children. For further information on the kind of technology we use, particularly in the context of processing sensitive personal data about your child, please contact our Data Protection Co-Ordinator.

When we disclose information

5.9 In order to pursue one of the legitimate interests set out above, we may share your and your child's personal information with:

5.9.1 local authorities, SEN co-ordinators, social services or the police where we have reason to believe there are safeguarding concerns in respect of your child;

5.9.2 where your child is not British, we may have to provide information about you or your child to UK Visas and Immigration;

5.9.3 business partners, professional advisors, debt collectors, suppliers and sub-contractors for the performance of any contract we enter into with them or you; and

5.9.4 credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

5.10 We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we need to get your consent

5.11 We will not market services to you (other than in accordance with paragraph 5.1.6 above) without your consent and you have the right to ask us not to use your contact details for marketing.

5.12 We will also seek your permission if we decide to post any photographs of your child on any of our marketing materials (including our prospectus, advertisement's or website).

5.13 You or your child do not have to give us details about your child's race, religion, or ethnicity if you do not want to. If you do provide us with this information, we only use these details to assist us with the day-to-day running of the daytime activity camp (for example, if your child's religion means that he or she has particular dietary requirements then we will of course be much better informed if we have this information to cater to your child's requirements) and for equal opportunities monitoring purposes.

Where you have given consent to the above, you can withdraw this consent at any time.

## **6 TRANSMISSION OF PERSONAL INFORMATION OUTSIDE THE EEA**

6.1 The data that we process about you and your child may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). We try to limit this where possible, but it may be necessary where, for example, one of our suppliers has a data centre outside the EEA. We will take all steps reasonably necessary to ensure that your and your child's data is treated securely and in accordance with this privacy notice and that the appropriate legal safeguards are in place prior to the transfer, for example particular ensuring that any contracts between us and the recipient of the information have EU-approved standard data protection clauses or are recognised as having adequate protection for the transfer of personal data.

## **7 YOUR RIGHTS**

7.1 Under the GDPR, you and your child have the following rights:

7.1.1 Right to correction. You have the right to have inaccurate personal data about you or your child rectified.

7.1.2 The right to erasure. You have the right to request that we delete your and your child's personal data where: (a) the personal data are no longer necessary in

relation to the purposes for which they were collected or processed; (b) you withdraw your consent to processing for which we previously obtained your consent; (c) you object to the processing and, as a result, we agree to cease that processing (please see paragraph 7.1.5 for more details); (d) the personal data has been unlawfully processed; and (e) we are required to erase the personal data in order to comply with the law.

**7.1.3 Right to restriction.** You have the right to obtain from us the restriction of processing where: (a) you contest the accuracy of the personal data we hold about you; (b) the personal data has been unlawfully processed; (c) we no longer need the personal data but they are required in limited circumstances; and (d) you object to the processing and, as a result, we agree to cease that processing (please see paragraph 7.1.5 for more details).

**7.1.4 Right to request transfer.** In certain circumstances, you have the right to receive personal data from us in a structured, commonly used and machine-readable format and the right to transmit it to a third party organisation.

**7.1.5 Right to object.** You have the right to raise an objection to any of our processing in paragraphs 5.1 and 5.2. Please tell us if you object to any type of processing that we do and we will work with you to address any concerns you may have.

**7.1.6 Right to object to marketing.** If you do not want us to process your personal data for direct marketing, please tell us and we will ensure that we no longer do this.

**7.1.7 Right to complain to the ICO.** Whilst we would always prefer it if you approached us first about any complaints or queries you may have, you always have the right to lodge a complaint with the Information Commissioner's Office.

**7.1.8 Right to request access.** You have the right to access personal data we hold about you. We encourage you to contact our Data Protection Co-Ordinator and request our standard SAR form for you to complete in order to help us process your request.

## **8 HOW LONG WE KEEP PERSONAL INFORMATION**

**8.1** We will not keep any personal data about you for any longer than is necessary for the purposes for which the personal data are processed.

**8.2** We follow a personal data retention policy which determines how long we keep specific types of personal information for. For further information about the criteria, we use to determine what periods we keep specific information, please contact our Data Protection Co-Ordinator. By way of summary, once a child in our records reaches the age of 15, we will delete their records soon afterwards (unless we think there is a good reason to keep them longer).

## **9 USE OF OUR WEBSITE**

**9.1** Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot

guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 10 CHANGES TO OUR PRIVACY NOTICE

10.1 Any changes we make to this privacy notice in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

This policy was adopted by: Just for Fun Holiday Club	Date: 01/06/21
To be reviewed: 01/07/22	Signed: