



## Privacy & Data Protection Policy

At Inventors & Makers we respect the privacy of the children attending our classes and workshops, and the privacy of their parents or carers. Our aim is to ensure that all those using and working at Inventors & Makers can do so with confidence that their personal data is being kept secure.

This **Privacy Policy** aims to give you information on how Inventors & Makers collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our mailing list **OR** email an enquiry **OR** sign up to one of our classes.

It is important that you read this **Privacy policy** together with any other **Privacy policy** or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This **Privacy Policy** supplements other notices and privacy policies and is not intended to override them.

21ST CENTURY EDUCATION LIMITED (Inventors & Makers' incorporated company) is the controller and responsible for your personal data.

We will respect confidentiality in the following ways:

- We will only ever share information with a parent about their own child.
- Staff only discuss individual children for purposes of planning and group management.
- Staff are made aware of the importance of confidentiality during their induction process.
- Information given by parents to the class leader or staff will not be passed on to third parties without permission unless there is a safeguarding issue (as covered in our **Safeguarding Policy**).
- Concerns or evidence relating to a child's safety, will be kept in a confidential file and will not be shared, except with the designated Child Protection Officer and the manager.
- Issues relating to the employment of staff, whether paid or voluntary, will remain confidential to those making personnel decisions.
- Confidential records and all personal data are stored securely in password protected folders on a password protected computer.
- Students on work placements and volunteers are informed of our confidentiality policy and are required to respect it.

## INFORMATION THAT WE COLLECT

Personal data, or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your first name and last name, your child's first name and last name, your child's date of birth, your child's gender.
- **Contact Data** includes your email address, your telephone number, and the phone numbers of any emergency contacts for your child.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes enquiries, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving updates and marketing from us and our third parties and your communication preferences.
- **Special Categories of Personal Data** includes information about your child's health, allergies, dietary preferences and doctor; information about your child's attendance, work and progress; information about any incidents or accidents during a class; and images of your children where express consent for this has been given.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide

you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including through:

1. **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - subscribe to our mailing list;
  - contact us through the website;
  - email us directly;
  - sign up for one of our classes;
  - register in full for one of our classes;
  - have your child attend one of our classes;
  - enter a competition, promotion or survey;
  - provide feedback.
2. **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns.
3. **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - (a) analytics providers such as Google based outside the EU;
    - (b) search information providers Google based outside the EU.

## HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

See the Glossary item **LAWFUL BASIS** to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	Identity Contact	Performance of a contract with you
To process your class sign up, including: <ul style="list-style-type: none"> <li>- Managing payments, fees and charges</li> <li>- Collecting and recovering money owed to us</li> </ul>	Identity Contact Financial Transaction Marketing and Communications	Performance of a contract with you  Necessary for our legitimate interests (to recover debts due to us)
To register your child and enable them to take part safely in a class	Identity Contact Special Categories: health, allergies, dietary requirements, doctor	Performance of a contract with you  Necessary to comply with a legal obligation  Necessary for a third party's legitimate interests (to provide appropriate care for your child)
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>- Notifying you about changes to our terms of our privacy policy</li> <li>- Asking you to leave a review or take a survey</li> </ul>	Identity Contact Profile	Performance of a contract with you  Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)

	Usage Marketing and Communications	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation exercise)  Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity Contact Profile Usage Marketing and Communications Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact Technical Usage Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

	Marketing and Communications	
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## **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can unsubscribe from our emails at any time.

## **PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or signed up to a class with us and you have not opted out of receiving that marketing.

## **THIRD PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## **OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time BY emailing [info@inventorsandmakers.com](mailto:info@inventorsandmakers.com), clicking the unsubscribe link in one of our emails or messaging us through our website.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## **DISCLOSURES OF YOUR PERSONAL DATA**

We will only share information with outside agencies on a need-to-know basis and with consent from parents, except in cases relating to safeguarding children or criminal

activity. If we decide to share information without parental consent, we will record this in the child's file, clearly stating our reasons.

We will only share relevant information that is accurate and up to date. Our primary commitment is to the safety and well-being of the children in our care.

Some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the normal running of our business, for example in order to take online bookings, to track work and progress during a class, and to manage our payroll and accounts. Any such third parties comply with the strict data protection regulations of the GDPR. Third parties are set out in the *Glossary*.

We may also disclose data to third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this **privacy policy**.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **DATA RETENTION**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

## **THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their **privacy** statements. When you leave our website, we encourage you to read the **privacy policy** of every website you visit.

## **SUBJECT ACCESS REQUESTS**

Parents/carers can ask to see the information and records relating to their child, and/or any information that we keep about themselves.

Staff and volunteers can ask to see any information that we keep about them.

We will make the requested information available as soon as practicable, and will respond to the request within one month at the latest.

If our information is found to be incorrect or out of date, we will update it promptly.

Parents /carers can ask us to delete data, but this may mean that we can no longer provide care to the child as we have a legal obligation to keep certain data. In addition, even after a child has left our care we have to keep some data for specific periods so won't be able to delete all data immediately.

Staff and volunteers can ask us to delete their data, but this may mean that we can no longer employ them as we have a legal obligation to keep certain data. In addition, even after a staff member has left our employment we have to keep some data for specific periods so won't be able to delete all data immediately.

If any individual about whom we hold data has a complaint about how we have kept their information secure, or how we have responded to a subject access request, they may complain to the Information Commissioner's Office (ICO).

## **DATA PROTECTION ACT**

We comply with the requirements of the Data Protection Act 1998, regarding obtaining, storing and using personal data.

## **GDPR**

We comply with the requirements of the General Data Protection Regulation (GDPR), regarding obtaining, storing and using personal data.



# GLOSSARY

## LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

## THIRD PARTIES

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Educational apps and websites that track student progress with the express consent of parents only.

## CHANGES TO THE PRIVACY POLICY & YOUR DUTY TO INFORM US OF CHANGES

We keep our **privacy policy** under regular review as shown at the end of this policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data’s accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

This policy was adopted by Inventors & Makers	Date: 21 January 2020
To be reviewed: 21 January 2021	Signed: <i>Laura Cross</i>

Written in accordance with the *Statutory Framework for the Early Years Foundation Stage (2017): Safeguarding and Welfare Requirements: Managing behaviour [3.52-3.53]*.

If you have any questions about this privacy policy or our privacy practices, please contact us via:  
Full Name: 21st Century Education Limited  
Email Address: [info@inventorsandmakers.com](mailto:info@inventorsandmakers.com)  
Postal Address: 50 Argyle Road, London, W13 8AA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.