

Website & CRM Privacy Policy

Introduction

This privacy notice provides you with details of how we collect and process your personal data through your use of our site www.hungrycaterpillars.co.uk and our **CRM System**. **Hungry Caterpillar Day Nurseries Ltd** is the data controller and we are responsible for your personal data. We have appointed a **Data Controller** who is in charge of privacy related matters for us. If you have any questions about this privacy notice, please contact the **Data Controller** using the details set out below.

Our full details are:

- **Full name of legal entity:** Hungry Caterpillar Day Nurseries Ltd, 12 Park Place, Newdigate Road, Harefield, Middlesex, UB6 6EJ
- **Our named Data Controller is:** Olivia Foley
- **Email address:** Olivia@hungrycaterpillars.co.uk
- **Postal address:** Hungry Caterpillar Day Nurseries Ltd, 12 Park Place, Newdigate Road, Harefield, Middlesex, UB6 6EJ

As part of *GDPR* it's important that the information we hold about you is accurate and up to date. If you have any changes to your data please let us know by contacting our **Data Protection Officer / Data Controller on this email address**

What data we collect and what we do with it

Personal data means any information capable of identifying any living individual or natural person however anonymised data is excluded.

From the data you share with us and on this website we may process the following categories of personal data about you:

- **Customer Data** this includes data relating to any purchases of services including but not limited to your name, title, billing/delivery address, email address, phone number, contact details, purchase details and your card details. We will only use this data to provide you with the nursery services you have purchased and to keep records of such transactions for our records. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.
- **Communication Data** this includes but is not limited to any communication that you send to us through our website, through email, text, social media messaging, social media posting, online chats or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment,

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pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

- **Technical Data** this includes but is not limited to data about your use of our website and online services such as your IP address, any login data, information regarding your choice of browser, length of visits to webpages, your journey through our website, how often you revisit the site time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system, we process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our marketing. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly maintain our website and help our business and to grow and define a marketing strategy.
- **Marketing Data** this includes but is not limited to data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in competitions, prize draws and free giveaways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this marketing. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy. We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display marketing on platforms including but not limited to: YouTube, Instagram, Twitter, Google ads display) and to measure or understand the effectiveness of the marketing you see. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).
- **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website effectively and ensure relevant content is provided to you. Like all companies to ensure the security of our website we maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

Collection of Sensitive Data

Hungry Caterpillar Day Nurseries Ltd do not collect any Sensitive Data about you. Under the GDPR sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union

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membership, information about your health and genetic and biometric data, we have no need to collect this data so don't. Sometimes we are required to collect personal data by law, or under the terms of the contract between Hungry Caterpillar Day Nurseries. If you fail to provide us with the information we require we may be forced to cancel your nursery place you ordered. If this does happen we will notify you at the time. We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email our data controller (as above). In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing. We may process your personal data without your knowledge or consent where this is required or permitted by law.

How we obtain your data

Often we collect data from you by you providing the data directly to us i.e. filling in a contact form on our website or entering a competition. However, we may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy for more details about this.

We will also receive data about you from 3rd party companies such as Google where we access their analytics platform, and Facebook where we use their display network, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.

We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

Marketing

When we engage with marketing activity our lawful ground of processing your personal data to engage with you using marketing communications is either your consent or our legitimate interests (specifically to grow our business).

Under PECR we may send you information about our company if you:

- You made a purchase or asked for information from us about our goods or services or
- You agreed to receive marketing communications and in each case you have not opted out of receiving such communications since.

You can still opt out of receiving marketing emails from us at any time. Before we share your personal data with any third party for their own marketing purposes we will get your express consent. You can ask us or third parties to stop sending you marketing messages at any time by selecting the unsubscribe option that will be on all marketing communication going forward.

Disclosures of your personal data

We may have to share your personal data with the parties set out below:

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- Other companies in our group who provide services to us.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies and Country Councils that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the GDPR and other Laws. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions and we will always have a legitimate reason for doing so.

International transfer of your data

Unfortunately countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal information, so the GDPR and other European Laws prohibit the transfer of personal data outside of the EEA unless the transfer meets certain criteria. Some of our third parties service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Sometimes we need to transfer your data outside of the EEA, when we do, we do our best to ensure a similar degree of security of data by ensuring a minimum of one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data (there is a full list on the ICO website that you can look at) by; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place. (Note Safe Harbour is invalid and we will never trust a company with this certificate)

Data security

Throughout our business we have put in place significant security measures to prevent your personal data from being breached. This includes your data being lost, used, altered, disclosed, or accessed without authorisation.

We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential and all employees have signed a Non-Disclosure agreement to this effect. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

Data retention

The data we collect from you will be retained only for as long as necessary to fulfil the purposes we collected it for. This will naturally include the purposes of satisfying any legal, accounting, or reporting requirements. For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

Your legal rights

GDPR gives you the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent. If you want to know more about your rights please take a look at the ICO website link provided here.

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to access your personal information that we hold on you (or to exercise any of the other rights), you can contact marketing@hungrycaterpillars.co.uk. Before we will release any information to you we will request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a robust security measure and is designed to ensure that you have both the right and legal basis for accessing such information. It protects your data from being disclosed to any person who has no right to receive it. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you. If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

Third party links

Our website www.hungrycaterpillars.co.uk sometimes includes links to third-party websites, plug-ins and applications. By 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, therefore we encourage you to read the privacy notice of every website you visit.

STATUTORY INFORMATION ABOUT HUNGRY CATERPILLAR DAY NURSERIES LTD

Registered in England and Wales Registered Company No. : 04011237

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Registered Office: Hungry Caterpillar Day Nurseries Ltd, Gautam House, 1-3 Shenley Avenue, Ruislip, Middlesex, HA4 6BP