

## Privacy Notice for Educ8 Group

### Who we are

Educ8 Group are a group of individual companies operating within the education and training sector. Members of the group include PlayFit who provide out of school hours clubs, pre-school childcare and holiday playschemes, SportFit who provide instructors into primary schools, STARS Charity which is the foundation arm of Educ8, and numerous Educ8 Alternative Education sites for secondary schools and local authorities.

Each of our individual companies that form our group are individually registered with the Information Commissioners Office (ICO) and act as the “Controller” of the personal data you provide us.

### What is the purpose of this notice?

To describe how we collect and use personal data about you in accordance with the General Data Protection Regulation (GDPR).

### Description of processing

#### ***PlayFit & SportFit***

We process personal information to enable us to provide childcare, encourage and supervise educational play, to advertise our services, to maintain our own accounts and records and to support and manage our staff.

#### ***STARS Charity & Educ8 Alternative Education***

We process personal information to enable us to provide education and training to our customers and clients; to promote our services, to maintain our own accounts and records and to support and manage our employees.

### Type/classes of information processed

We process information relevant to the above reasons/purposes. This may include:

#### ***PlayFit & SportFit***

- personal details
- family details
- GP contact details
- lifestyle and social circumstances
- digital images of the child’s progress

#### ***STARS Charity & Educ8 Alternative Education***

- personal details
- family details
- business activities of the person whose personal information we are processing

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- financial details
- education and employment details
- goods or services provided

We also process sensitive classes of information that may include:

- physical or mental health details
- racial or ethnic origin
- religious or other beliefs
- trade union membership

- lifestyle and social circumstances
- financial details
- training details
- education and employment details
- goods and services

We also process sensitive classes of information that may include:

- physical or mental health details
- racial or ethnic origin
- religious or other beliefs
- trade union membership

## Who the information is processed about

We process personal information about:

### ***PlayFit & SportFit***

- our employees
- the children in our care
- advisers, complainants, enquirers
- suppliers

### ***STARS Charity & Educ8 Alternative Education***

- customers
- clients
- students
- trainers
- employees
- suppliers
- professional advisers and consultants
- complainants, enquirers

## Who the information may be shared with

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the General Data Protection Act (GDPR).

What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

- family, associates and representatives of the person whose personal data we are processing
- healthcare, social and welfare advisers or practitioners

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- business associates
- financial organisations and professional advisers
- credit reference agencies, debt collection and tracing agencies
- education, educators and examining bodies
- current, past or prospective employers
- employment and recruitment agencies
- schools
- local and central government
- persons making an enquiry or complaint
- suppliers
- service providers

## Our legal grounds for using your information

This section contains information about the legal basis that we are relying on when handling your information.

### ***Legitimate interests***

This means that the processing is necessary for legitimate interests except where the processing is unfair to you. We rely on legitimate interests for most of the ways in which it uses your information.

Specifically, we have a legitimate interest in:

- Providing educational services to your child;
- Safeguarding and promoting the welfare of your child (and other children);
- Promoting the objects and interests of the setting. This includes making sure that we are able to enforce our rights against you, for example, so that we can contact you if unpaid fees are due;
- Facilitating the efficient operation of the setting; and
- Ensuring that all relevant legal obligations of the setting are complied with.

If you object to us using your information where we are relying on our legitimate interests as explained above please speak to the Data Protection Officer.

### ***Necessary for a contract***

We will need to use your information in order to perform our obligations under our contract with you. For example, we need your name and contact details so that we can update you on your child's progress and so that we can contact you if there is a concern.

### ***Legal obligation***

Where the setting needs to use your information in order to comply with a legal obligation, for example to report a concern to Children's Services. We may also have

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to disclose your information to third parties such as the courts, the local authority, OfSTED or the police where legally obliged to do so.

***Vital interests***

For example, to prevent someone from being seriously harmed or killed.

***Public interest***

The setting considers that it is acting in the public interest when providing education.

The setting must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

***Substantial public interest***

The processing is necessary for reasons of substantial public interest.

***Vital interests:***

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

***Legal claims:***

The processing is necessary for the establishment, exercise or defense of legal claims. This allows us to share information with our legal advisors and insurers.

***Medical purposes***

This includes medical treatment and the management of healthcare services.

## Where we keep it and transferring information overseas

We are based in the UK and we store our data within the EU. Some organisations which provide services to us may transfer personal data outside of the EU, but we will only allow them to do if your data is adequately protected.

For example, some of our systems use Microsoft and/or Google products and services such as file storage. As both are US companies, it may be that using their products result in personal data being transferred to, or accessible from, the US. However, we will allow this as we are certain personal data will still be adequately protected (as Microsoft and Google are both certified under the USA's Privacy Shield scheme).

## For how long do we keep your information?

We keep your information for as long as we need to in order to educate and look after your child. We will keep some information after your child has left the setting, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law. An example of this may be where an accident or injury has occurred we need to keep records for a minimum of 3 years beyond the child's 18<sup>th</sup> birthday.

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored depends on the information in question and what it is being used for. For example, if you ask us not to send you marketing e-mails, we will stop storing your e-mails for marketing purposes (though we'll keep a record of your preference not to be e-mailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information. We will not retain your data for any longer than necessary and the longest time that we will hold your data will be six years.

## Requesting access to your personal data

Under data protection legislation you have the right to request access to information that we hold about you and if applicable your child. To make a request for your personal information, or be given access to your child's childcare record, contact the Data Protection Officer.

We want to ensure that you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as a data subject access request)
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason)
- the right to have inaccurate data rectified
- the right to object to your data being used for marketing or profiling; and
- where technically feasible, you have the right to personal data you have provided to us which we process automatically based on your consent or the performance of a contract. This information will be provided in a common electronic format.

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Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office, the UK supervisory authority for data protection issues at <https://ico.org.uk/concerns/>

## Contact

If you would like to discuss anything in this privacy notice, please contact:

**Tim Warner, Data Protection Officer, [tim.warner@educ8group.com](mailto:tim.warner@educ8group.com) or 07817 641240**