



RAFA KIDZ PRIVACY NOTICE – MAY 2019

RAFA Kidz Limited will comply and handle data/information in accordance with the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR) and any subsequent legislation on information handling and privacy.

We promise to respect the confidentiality of any personal data you share with us (or that we get from other organisations) to keep it safe, and we will always take every effort to protect your privacy.

We pride ourselves on our honesty, transparency and openness and will always be clear how, when and why we collect and process your information; we promise will never do anything with your details that you wouldn't reasonably expect.

WHO ARE WE?

RAFA Kidz Limited is a company limited by shares registered under Company Number 11927027 whose registered office is at Atlas House, Wembley Road, Leicester, LE3 1UT. We are registered as a data controller at the Information Commissioner's Office.

For simplicity throughout this notice, 'we' and 'us' means RAFA Kidz Limited. We are a wholly-owned subsidiary of the Royal Air Forces Association ("the Association"), which is a member-led welfare charity, registered with the Charity Commission in England and Wales under charity number 226686 and with the Office of the Scottish Charity Regulator under charity number SC037673. The Association is established to provide welfare to serving and former serving members of Her Majesty's Air Forces and their dependents.

The Association provides administrative support to us under a Resource Sharing Agreement. More information about how we share your personal data is set out below (see **Who do we share your personal data with?**).

You can contact us and / or the Association by phone on 0800 018 2361 or by email privacy@rafa.org.uk for more information about how we and / or the Association handle your data. You can also read the Royal Air Forces Association's privacy notice at www.rafa.org.uk/privacy.

WHAT TYPE OF PERSONAL INFORMATION DO WE HAVE?

The type of relationship you have with us will determine the specific information we will need to hold about you.

If you are a prospective customer:

Contact information that you provide when requesting further information via telephone, email, online or in person. Contact information may include your name, telephone number, and email/postal address. We will also collect general information about your child / children and your relationship to the RAF / Station (we provide preferential terms and give priority to serving families.)

If your child/children are registered in the nursery:

Data such as your child's full name and their date of birth, home address, and full details of parent/carers – full name, address, email address and National Insurance numbers, relationship to the RAF / Station; details of other persons with parental responsibility; contact numbers for those with parental responsibility; details of emergency contacts for when you are not

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Incorporated in England and Wales under company registration number 11927027.
VAT number 222464292. Registered office as above.

contactable; your child's dietary and medical conditions; and medical consents. Arrangements for payment of nursery fees.

We also create records during the course of providing services to you or your child such as notes from meetings/calls. Records created during the nursery day include the completion of forms recording activities and behaviours such as illness, sleep, nappy changes, meals, medication, learning, interactions with others, and accidents. We also take photographs of children to share with their parents and as part of their learning journey records.

If you are a prospective employee:

All personal data provided by you in your job application or speculative applications or CVs that you send to us any subsequent information supplied by you in connection with your application for employment and any information obtained from third parties such as prior employers, the Disclosure and Barring service (and similar for Scotland and Northern Ireland) and other sources. This will include contact information, right to work information, names and contact information for referees (it is your responsibility to obtain consent from referees before providing their personal information to us). We will also hold sensitive information (race/ethnic origin/medical) if you choose to submit it as part of the application process and we may request you complete a health questionnaire (certain roles only).

If you are an employee or worker:

Personal contact details such as name, title, postal address, telephone numbers, and a personal email address; date of birth; gender; next of kin and emergency contact information; National Insurance number; bank account details, payroll records and tax status information; salary, annual leave, pension and benefits information; recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process); employment records, accident records; performance information; information relating to work attendance and absence and punctuality; information about your use of our information and communications systems; photographs.

We may also request, with your permission collect, store, and use the following "special categories" of more sensitive personal information about your race or ethnicity, religious beliefs, sexual orientation and political opinions; trade union membership; health, including any medical condition, health and sickness records; any criminal convictions and offences.

If you engage with us online or via social media:

Your social media username and public comments/feedback on social media are collected so that we can respond to comments, questions or feedback. These online and social media sites typically have their own privacy policies explaining how they use and share your personal data. You should carefully review those privacy policies before using these sites to make sure that you are happy with how they collect and share your personal data.

If you visit our premises

CCTV cameras may capture images and children's images throughout the nursery day. Depending on the positioning of external cameras we might capture car number plates.

HOW AND WHEN DO WE COLLECT YOUR PERSONAL DATA?

How you interact with us determines when we collect your personal data. Most information we will collect from you directly:

- When you engage with us online or via social media e.g. use our websites, apps and social media
- When you contact us for information or customer service on the telephone, email or in person
- When you book a visit or appointment
- When you register for our services
- While you receive services, e.g. completing electronic and paper forms, assessments and other documentation
- When you apply for a job or become an employee
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If you fail to provide certain information when requested, we may not be able to perform the respective contracts we have entered into with you or we may be prevented from complying with our respective legal obligations to parents.

We will also collect information about you from third parties:

- If you receive government funding, we receive personal data from the government on your eligibility for the funding and other reporting identifiers
- Government agencies may provide us with personal data to support their regulatory obligations or investigations
- Third-party marketing companies provide us with contact details for individuals who have consented to receive marketing materials. You have the right to opt-out of these communications at any time – please contact them directly
- Current or past employers providing employment references

Google Analytics

We use Google Analytics to analyse the use of our websites by generating statistical and other information. Details captured during your visit to our websites will include, but are not limited to, traffic data, location data, weblogs and other communication data and the resources you access. However, all data collected is anonymous and will not identify you as an individual.

Google, not us or the Association, stores this activity information. You can view Google's privacy policy at <http://www.google.com/privacypolicy.html>.

To opt out of being tracked by Google Analytics across all websites visit <https://tools.google.com/dlpage/gaoptout>.

Cookies

Like most websites, we use “cookies” to help us make our site – and the way you use it – better. Cookies mean that a website will remember you. They are small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields. There are more details in the Association's cookie policy.

In addition, the type of device you use to access our website or apps and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you're using, what your device settings are, and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

WHY DO WE HOLD YOUR PERSONAL INFORMATION?

We can only collect, hold and use your personal data where we have a lawful basis. There are a number of lawful basis on which we rely and these are set out below.

Performance under a contract:

Most of your personal data we process is necessary to perform our obligations under a contract we have with you, either to provide nursery services to you and your child or in relation to your employment contract (if you are an employee). We can only provide the service to you or your child and manage employment contracts if you provide us with the personal data necessary to perform the contract.

Legal obligations: There are many laws that require us to process your personal data. We can only provide nursery services to you or your child if you provide us with the personal data required under law. Examples include childcare statutory regulations, safeguarding/health/safety regulations, tax and government funding regulations. We are also legally obliged to collect, retain and disclose certain information about our employees.

Legitimate interests: In some situations, we process your personal data to pursue our legitimate interests as a business. We will only process your personal data if our legitimate interests do not have a material impact on your interests, fundamental rights or freedoms.

Examples include:

- If you are a prospective, current or former customer, using your contact details to follow up either by email, post, telephone or in person to obtain your feedback on our service offering, reasons for choosing or not choosing our services and your experiences with our company.
- If you are a prospective, current or former customer, using your contact details to send you, **by post**, publications (e.g. newsletters, brochures), information on activities, events and news about us, the Association and any other Association group company and the services they provide. **You have the right to opt out of such postal marketing at any time.** Contact us on 0800 018 2361 or by email privacy@rafa.org.uk.
- Using CCTV cameras/footage to assist with crime prevention, monitoring our policies/procedures, training and development, internal and external investigation/proceedings and law enforcement activities.
- Recording calls to the nurseries and our HQ to assist with monitoring our policies and procedures and identifying opportunities for training and development.

Consent: We rely on your consent to process your personal data in very limited circumstances such as:

- If we need to process special category data;
- If you provide personal data to receive, **by email or telephone**, publications (e.g. newsletters, brochures), information on activities, events and news about us, the Association and any other Association group company.

Where we rely on your consent to process information you have the right to withdraw your consent at any time.

WHAT DO WE DO WITH YOUR PERSONAL INFORMATION?

We use your information in order to:

- To respond adequately to your requests for services or information;
- To provide resource material/information regarding our services and areas likely to be of interest to you;
- To provide our services to you;
- To provide a safe, healthy and successful environment for those to whom we provide services;
- To administer first aid, emergency and other medical care, when necessary;
- To comply with laws and government regulations/standards;
- To facilitate and process payments for the services we offer;
- For tax purposes and other financial requirements and obligations;
- To administer employee payroll, benefits, tax/regulatory compliance and other record-keeping and administration requirements;
- To consider applications for employment;
- To promote the services that we offer and those of the Association and other group companies.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We are committed to keeping your personal data confidential and we will never sell your personal data to a third party. We will only share your personal data where the law allows or requires us to do so, for example:

- We may need to disclose your details if required by law or regulation or as we reasonably determine to be necessary to protect our rights or the rights of others, to prevent harm to persons or property, to fight fraud, e.g. to the police, other agencies, for example HMRC, regulatory bodies or our legal advisors.
- We may also share your data with third parties who provide data processing services on our behalf. Where this the case we will ensure they protect your data and only use/hold it temporarily, for the specific purposes that we instruct them to.
- We will share your data with the Royal Air Forces Association as set out below.

As a subsidiary of the Association we receive administrative support from the Association under a Resource Sharing Agreement. In respect of the nursery services we provide to customers, the Association acts as a data processor and there is a written data processing agreement in place. In respect of other data handling activities, including in relation to employees, both we and the Association will be data controllers.

The Association is a registered charity, established to provide welfare to serving and former serving members of Her Majesty's Air Forces and their dependents. It relies on public support, particularly from the RAF family; fundraising (including through events) and donations are crucial to sustaining the Association's long term survival and it is reliant on its members and volunteers to both financially support and directly deliver its welfare work. We were set up by the Association to provide nursery services primarily for the benefit of serving RAF personnel and their families and as such in respect of marketing and promoting the aims, ideals and services

of us and the Association, we and the Association have a shared interest and act as joint data controllers in respect of the personal information of past, present and potential future supporters and customers.

Given the nature of the relationship between us and the Association and other Association group companies, we will share supporter and customer contact details with the Association so it can write to you about its activities and how you can support its work, balancing your right to privacy with your reasonable expectations about being kept informed. The Association promises not to bombard you with communications and **at any time you can opt out** of receiving such communications from the Association by phoning 0800 018 2361 or privacy@rafa.org.uk.

The Association's marketing communications include information about its welfare work and how you can help support it through membership, volunteering, fundraising, donating, participating in events or purchasing goods from its trading company, RAFATRAD Limited. You can read the Royal Air Forces Association's full privacy notice at www.rafa.org.uk/privacy.

HOW DO WE STORE YOUR PERSONAL DATA?

We ensure that there are appropriate physical and technical controls in place to protect your personal details. Your personal information will be held and/ or hosted securely within the UK or the EU.

Paper records are always locked away, either at the nursery or at the Association's HQ in Leicester.

Electronic records are held on the Association's network which is protected and routinely monitored and we also use an online nursery management system, which helps us manage our nursery smoothly. Where we use external companies to collect or process personal data on our behalf we do comprehensive checks on these companies before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect or have access to. We'll only ever allow your data to be used/held temporarily by suppliers working on our behalf.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff and contractors.

HOW LONG WE RETAIN YOUR INFORMATION AND HOW WE KEEP IT UP TO DATE

We will only keep your information for as long as we need it. In some cases there are statutory timescales on how long we should keep your information, for example, employment records for six years after an employee leaves. We will delete your information according to these statutory limits, or according to guidance issued including by the Information Commissioner or in accordance with insurance requirements.

We are committed to ensuring that we keep your information accurate, and up-to-date. We would therefore appreciate it if you would let us know if your contact details change.

YOUR RIGHTS

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal data in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us using the details below if you wish to make a request.

Vikki Hall – Director of Governance & Risk

RAF ASSOCIATION

Atlas House

Wembley Road

Leicester

LE3 1UT

Tel: 0800 018 2361

Email: privacy@rafa.org.uk

Post: FREEPOST The Royal Air Forces Association

How to complain:

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

CHANGES TO PRIVACY NOTICE

We may change our Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our website or by notifying you directly.

Date Originated	MAY 2019	Signature
Date Reviewed		