

PRIVACY POLICY

Document created by:

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Position	Founder
Date	10/09/20

Document last modified by:

Name	J. Johnson
Position	Founder
Date	21/07/23

Date of next review	11 th January 2025
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We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Young Giants Limited (Company Number 12495621) the registered office of which is at: 2-4 Packhorse Road, Gerrards Cross, Buckinghamshire, England, SL9 7QE
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic data Biometric data (where used for identification purposes) Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to; student or parent

Personal data we collect about you

We will collect and use the following personal data about you:

- Name of client or contact (business to business data, from local and education authorities, schools and PRUs)
- Name of parents/carers and learner
- Contact information, including email address and telephone number
- Date of birth of learner
- Photograph of learner
- Gender of learner
- Passport or other ID information of parents and /or learner

- Special categories of information (such as ethnicity, language, country of birth, nationality, information regarding health, special educational needs, allergies and disability).
- Emergency contact details
- Welfare concerns of learner
- Technical Data includes internet protocol (IP) address, your login data, 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 our website.
- Usage Data includes information about how you use our website, product and services
- Cookies Data like many websites, we use "cookies" to enhance your experience and gather information about visitors and visits to our websites.

How your personal data is collected

We collect some of this personal data directly from you (the parent or learner, or client, or client contact) in person, or email. However, we may also collect information from local authorities, school and other alternative education providers regarding parents or children.

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where the parent has given consent for processing their or their child's data (where required and as per applicable laws)
- to comply with our legal and regulatory obligations;
- for the performance of a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business reason to use your personal data, so long as this is not overridden by your own rights and interests.

How and why we use your personal data—Special category personal data

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g.:

- we have your explicit consent to process your child's data
- the processing is necessary to protect your (or someone else's) vital interests; or
- the processing is necessary to establish, exercise or defend legal claims.

Who we share your personal data with

We may have to share learner's and their family's data with third parties, including third-party service providers and other bodies such as:

- Education Authorities
- Local Authorities
- Schools
- Tutors who provide education services
- Any third-party providers we may commission or work in collaboration with
- Our cloud service provider

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

Cookies

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our service. All Cookies used by and on our website are used in accordance with current UK Cookie Law.

How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used. For more information on how long we retain your information, please contact us.

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data. Please see our Subject Access Request template at Appendix A
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to

	continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. We do not undertake automated decision making.
The right to withdraw consents	<p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time</p> <p>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>

For more information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below) or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights.

If you would like to exercise any of those rights, please:

- see below: '**How to contact us**'; and
- provide enough information to identify yourself
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

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

If you want detailed information from Get Safe Online on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with The Information Commissioner who may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

Changes to this privacy policy

We may change this privacy notice from time to time, when we do we will inform you via *our website*.

How to contact us

You can contact us by email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint:

enquiries@younggiants.co.uk

APPENDIX A

SUBJECT ACCESS REQUEST TEMPLATE

Ask for your copies of your data

You have the right to ask for copies of your personal data we store and use. This is your right of access, also known as making a subject access request or SAR. We'll normally respond at the latest within one calendar month of receiving your request. There may be times where we need longer or we may need to charge a reasonable fee for admin costs. We'll let you know if this is the case.

You don't have to use this form to ask for copies of your data, but it's helpful for us to know what you're looking for so we can respond fully and promptly.

Please send your completed form to us using the contact details at the bottom of the page.

You can read more about your right of access by visiting: <https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/>

1. Who is making this request?

We're asking for your contact details so we can send your response and discuss your request with you (if needed). You only need to give us relevant details. For example, you only need to give us your postal address if you'd like us to respond by post or if you think it would help us identify you. We may ask you for proof of ID if we feel it's reasonable and proportionate. The timescale for responding to your request will start when we receive this.

Your name:

Contact number:

Email address:

Postal address:

Are you making this request on behalf of someone else?

Yes

No (please move to question 3)

2. Please provide the contact details of the person you are making the request for:

If you're making the request on behalf of someone else, we need to know who they are and their contact details in case we need to get in touch.

Name of other person:

Contact number:

Email address:

Postal address:

Other contact information for the person you are making the request for:

You also need to give us proof of your authority to act on their behalf. For example, this could be written authorisation from them or a relevant power of attorney.

Please send proof of authority together with this form when you make your request.

Yes, I've got proof of my authority to act on someone else's behalf and I'll include it with my form. (Please move to section four.)

No, I haven't got any proof of authority yet, but will send it at a later date. I understand you can't action my request until you receive this information.

3. How would you like us to respond to you?

We'll try and respond to you in the way that suits you. Please let us know if you need us to make any adjustments for you e.g. large font.

Email

Post

Other (please specify)

4. What personal data are you requesting?

If you know exactly what personal data you're looking for, it's helpful if you let us know. For example, if you need a specific email, we could search for this using a particular word or phrase.

Briefly describe your request:

5. Is there a date range of the personal data you're asking for?

It's helpful if you're as specific as possible about your request. For example, if you've been a customer for several years, but you only need data about your recent purchase history, you could ask for data about things you've bought only in the last few months.

Date from:

Date to:

6. Can you tell us anything else to help us with our search?

If there's anything else of relevance you can tell us to help us identify you or the data you're requesting, please include this here. For example, any aliases, date of birth, order number or a customer reference number.

Further information to help us find the data you need:

Thank you. We'll be in touch. If you'd like more information about how we use your data, have a look at our [Privacy Policy](#) above and our [Data Retention Policy](#).