

## Privacy Policy

### Purpose of this Privacy Policy

This privacy policy covers Hackney Play Association's collection, processing and storing of users' data for the services we deliver and for our digital platforms, including our website [www.hackneyplay.org](http://www.hackneyplay.org), mailing lists and social media platforms. It contains our commitments to keeping users' data safe and information to help users make appropriate decisions about their interactions with these platforms.

### General

We collect and process your data in order to provide you with Hackney Play Association services.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure any personal information we hold.

You can contact us at any time to ask what data we hold about you (a Subject Access Request) and to ask us to delete any data we hold about you. We will respond within 30 days. Our main contact for data enquiries is: [info@hackneyplay.org](mailto:info@hackneyplay.org).

If you're unhappy with the way we've handled your data or your request for access to it, you're entitled to make a complaint to the Information Commissioner's Office - see <https://ico.org.uk/>.

### Information we may collect from you

We may collect and process the following data about you:

- Information that you provide by filling in forms on our website. This includes information provided at the time you subscribe to our mailing list or when you get in touch with us through the website.
- If you contact us, we may keep a record of that correspondence.
- Information that you provide to enable you to use our services. This includes information provided at the time of registering to use our sites, including information about both child and parent/carer, through application, admission and registration forms, permission/consent forms, attendance registers, observations and planning, photographs,

Hackney Play Association works to improve play opportunities for children and young people in Hackney.

Registered Charity No. 272651.

health and SEND records, accident and incident records, child protection/safeguarding records, complaint records.

- CCTV may be in operation at our settings for building security purposes.

### **Where we store your personal data**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure any personal information we hold.

All information you provide to us is stored in lockable files or on password protected computers.

### **Uses made of the information**

We may use the Personal Information we collect for a range of reasons, including:

- To provide our service and to support you to use our services.
- For administration and accounting and to ensure that the content and services that we offer are tailored to your needs and interests.
- To provide you with information, products or services that you request from us or which we feel may interest you.
- To carry out our obligations arising from any contracts entered into between you and us.
- To communicate with you about your use of our services and provide customer support.
- To notify you about changes to our service.
- To share information with parents/carers about their children. Where we have given you (or where you have chosen) a password which enables you to access a childcare software package, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- To meet statutory requirements.
- To bill and collect money owed to us by you.
- To provide information to representatives and advisors, including lawyers and accountants, to help us comply with legal, accounting, or security requirements.
- To meet legal requirements, including complying with court orders and other appropriate legal mechanisms.
- To prosecute and defend a court, arbitration, or similar legal proceeding.
- To respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- To carry out other legitimate business purposes, as well as other lawful purposes about which we will notify you.

### **Our Website**

Our website and Hackney Play Association (the owner) take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. Our website is hosted by GreenNet and GreenNet's Code of Practice on Data Protection is available at: <https://www.greennet.org.uk/about/code-practice>.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your

information, we will use strict procedures and security features to try to prevent unauthorised access.

## **External Links**

Hackney Play Association aims only to include safe and relevant external links on our website; however, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website. Hackney Play Association cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note they click on external links at their own risk and this website and Hackney Play Association cannot be held liable for any consequences or damages caused by clicking links to any external websites.

## **Email News and Updates**

If you sign up to any of Hackney Play Association's mailing list we will hold and process your data (name and email address) in order to send you email bulletins. We will use tracking data in our mailing software (Mailchimp and Mailman) to analyse engagement with the newsletter and to improve its content and distribution on an ongoing basis.

We will not use your data for any other purpose or share it with any other organisation. You can opt out of our mailing list at any time using the link in the footer of the email or by contacting [info@hackneyplay.org](mailto:info@hackneyplay.org).

## **Social Media Platforms**

This applies to Hackney Play Association's accounts on facebook and twitter. These platforms operate on their own terms and conditions which visitors to Hackney Play Association's pages should read with regard to their privacy and personal data. Twitter's privacy policy can be found at <https://twitter.com/en/privacy> and Facebook's privacy policy can be found at <https://en-gb.facebook.com/policy.php>. Our website offers social sharing buttons which help users share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

Hackney Play Association will monitor users' behaviour on our social media platforms using the tracking data gathered by the respective platforms. We will use this data in anonymised form and will not link it to any identifying information or use it for profiling individual users.

Hackney Play Association will not use any of our social media platforms to ask for personal or sensitive information and encourages users wishing to discuss sensitive information to contact us through primary communication channels such as by telephone or email.

## **Disclosure of your information**

We may disclose your/your child's personal information to third parties:

- To share information with government bodies that fund us.
- To enable a transfer of children's records from our nursery to schools when a child leaves our setting to start school.

- To fulfil our duty to safeguard children and follow child protection procedures as set out in 'Working Together to Safeguard Children'. See our 'Safeguarding' policy for further information.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use and other agreements; or to protect the rights, property, or safety of Hackney Play Association, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- Any other person with your consent.

### **Legal basis for processing your data**

Our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it. We may process your data because:

- we are legally obliged to, eg to meet the statutory requirements of Ofsted and the Children's Act 1989;
- the processing is necessary for the performance of the contract with you to provide our services;
- the processing is necessary because of vital interests, eg making a safeguarding referral;
- the processing is necessary for performing a public task, eg completing headcount and census returns for the local authority; or
- it is in our legitimate business interests to do so, and this is not overridden by your data protection interests or fundamental rights and freedoms.

In some instances, we will rely on your consent to process personal data and where we do this, it will be flagged to you at the time.

### **How long do we keep your personal information?**

We keep your personal information for as long as we need to for the purposes for which it was collected or (if longer) for any period for which we are required to keep personal information to comply with our legal and regulatory requirements. Our retention periods will vary depending on the type of data involved.

When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymise it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal

Information and isolate it from any further processing until deletion is possible.

### **Your rights**

You are responsible for ensuring that information you provide to us is accurate, complete and up-to date. You can review and change your information by contacting the lead worker at the setting you/your child uses.

You have a number of rights in relation to your personal data, these include the right to:

- find out how we process your data;
- request that your personal data is corrected if you believe it is incorrect or inaccurate;
- request that your data is deleted;
- obtain restriction on our, or object to, processing of your personal data;

if we are relying on consent, you can withdraw your consent to our processing of your personal data (including any direct marketing);

- if we are relying on legitimate interests for direct marketing, you can object to receiving such direct marketing;
- obtain a copy of the personal data we process concerning you;
- lodge a complaint with the UK supervisory body, the Information Commissioner's Office (the ICO) here <https://ico.org.uk/>. If you have a concern or complaint about the way we handle your data, we ask that you contact us in the first instance to allow us to investigate and resolve the matter as appropriate.

If you would like to exercise any of your rights or find out more, please contact us.

### **Reminder**

You can contact us at any time to ask what data we hold about you (a Subject Access Request) and to ask us to delete any data we hold about you. We will respond within 30 days. Our main contact for data enquiries is: [info@hackneyplay.org](mailto:info@hackneyplay.org)

If you're unhappy with the way we've handled your data or your request for access to it, you're entitled to make a complaint to the Information Commissioner's Office - see <https://ico.org.uk/>.