

# The Clubhouse Ltd

## Privacy Policy

The Clubhouse Ltd acts as a Data Controller for the purposes of [GDPR](#). To process your booking/enquiry we need to collect personal details about you and all the children on your booking. We will respect and protect your privacy at all times. This policy sets out how we will collect, use and store any personal data about you and your child(ren).

By creating an account with us, you are agreeing to us storing and processing this information as set out below. You are responsible for ensuring you have the agreement from all persons on your account and booking to pass on their details to us.

### What is our legal basis for processing data?

Our lawful bases for processing data are as follows:

Contract – the processing of data is necessary to fulfil our service agreement with customers

### When do we collect data?

When you register your details with us or make a booking we will need to collect certain personal details in order to process your booking and make the necessary arrangements for your child(ren) to attend activities.

Prior to attending an activity we will also need to collect more sensitive personal data, specifically relating to the children on your bookings, such as medical conditions, allergies and educational needs in order to ensure we can provide the appropriate care for your child. During activities you may need to complete forms which will require personal information relating to you or your child or if you contact us with a query/complaint.

We may also collect data from you in other ways that will request your name, address, email address and telephone number.

### What data do we collect?

Account Holder details - Name, address, DOB, telephone numbers, email address, encrypted log in password, details of your interactions with us e.g. a query on your account/complaint, details of your visits to our website (see Cookies), personal details to help tailor our services to you.

Children's details – Name, address, DOB, medical, behavioural or educational needs, school and registered GP.

The law requires us to take reasonable steps to ensure data is kept accurate and up to date. We remind customers to update details when logging into their account.

### Cookies

Our website uses cookies. Some cookies are essential and are there to enable you to make your booking and transact, others are non-essential and are used to track visitor behaviour on the site, determine relevant products to show you for re-marketing purposes, track where visitors have come from or to improve user experience. Cookies are not harmful and do not contain any personal information e.g. address or DOB. You can choose to accept or decline cookies when you first visit the site by accessing the preference panel from your browser's main menu (usually found under Edit, Tools or Options). If you choose to remove cookies, some of our site may not function properly for you and your use of the site may be impaired.

We may collect details about your device and visits to this site including IP address, browser type, device type, page interaction information, traffic data and location information. This is statistical information to help us provide the best online experience for our customers and does not identify any individual.

## How do we use your data?

If you have a booking with us, we will use your data in relation to delivering our childcare services, to contact you with information relating to your booking and your child(ren)'s time at an activity, to protect the welfare of your child, to comply with our legal obligations and to process payments.

Third Parties - We will not pass on your personal information to other users of the site and we will only ever pass on your personal details to a third party if it is necessary to fulfil a particular service on your behalf or as part of our normal business activities. Any details passed on will be transferred in a secure manner.

Should any safeguarding concerns or legal proceedings require us to pass on your personal information we trust you will understand that we have a duty to comply with the law. Please be aware that the way in which your personal details would be legally protected within the UK may differ from other countries.

## How do we protect data?

Storage - Once data is received, we will take all reasonable steps to ensure your data is secure to prevent unauthorised access to it. All information you provide is stored on secure databases, our IT systems are password protected and all payment transactions are encrypted.

Security and passwords - When you create an account with us you are assigned a Customer ID number. Your account will require an email and password so that you can access your details online. The password is automatically generated by the booking system and we recommend you keep this password safe for future bookings.

Please do not share your password with anyone. Unfortunately, the passing of data via the internet is not completely secure therefore any transmission is at your own risk. Please keep these details safe and not written down anywhere. If you change your personal details or if you suspect that someone else has used your password, please notify us as soon as possible.

## How long do we keep data for?

Once a child leaves our care we retain only the data required by statutory legislation and industry best practice, and for the prescribed periods of time. Electronic data that is no longer required is deleted and paper records are disposed of securely.

## Your rights

You have the following rights in relation to your data:

Right to access, rectification, erasure, data portability, object and automated decision making (including data profiling).

If you would like to exercise any of these rights please write to:

General Manager, The Clubhouse Ltd, Tickle Trout Cottage, Houghton Road, Stockbridge SO20 6LE

Please note that in some circumstances we will still need to retain certain data in order to comply with our legal obligations.

If a subject access request is put forward, we will send the information within one month and free of charge – this will be sent in a protected file.

If you are not happy with the way we have handled your data, or responded to your requests you can lodge a complaint with the Information Commissioner's Office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or by phone on 0303 123 1113.

## Changes to our policy

We reserve the right to update this policy from time to time and we will keep you informed by updating this statement on our website.