

Data Protection and Confidentiality

In2Care is committed to protect the privacy of individuals who either visit our website, make a booking through our booking system or attend one of our services.

Data controller

The Data Controller who is responsible for your personal data is Chris Glover at In2Care Ltd whose office is situated at 12 Milbanke Court, Milbanke Way, Bracknell, Berkshire, RG12 1RP. Our contact details are Tel: 07899 995 249 email: info@in-2-care.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We appreciate the chance to deal with any concern you have prior to raising the issue with the ICO.

Personal Data we collect from you and how this is processed

When using our website's online facilities or when opening an account with our customer service team, you will be required to provide personal data in relation to yourself but also for the children who you will register to attend our services. When providing any personal information relating to a child you warrant that you are a person with parental responsibility for such child.

Personal data means information that specifically identifies you (or your child) as an individual or is capable of doing so.

Information we collect

Personal data is collected from you when you register to use our services, make bookings, enter into any of our competitions or promotions, submit a customer review, apply for a job or enter into correspondence with us.

The information we collect about you, as both the person with parental responsibility for the child registering for our services and the account holder is:

- your name, address and contact details
- ethnicity and spoken languages
- details of any feedback you give us by phone, email, post or via social media
- your account details, such as username, login details
- information relating to your child/children
- medical information related to your child/children
- dietary information related to your child/children
- name and contact number of authorised emergency contacts and collectors (x3)
- Various permissions including sun cream or group photo permission

We use this personal information to:

- create and manage your account with us
- verify your identity
- provide services to you
- ensure safeguarding of your child/children
- customise our websites and its content to your particular preferences
- notify you of any changes to our website or to our services that may affect you

- improve our services

The collection of any health or special care related information is so that we can ensure our services are run safely and the interests of your child are protected while in our care.

In order to protect the interests of the children attending our services we may from time to time determine that attendance of a particular child due to health or other requirements is not in the best interests of that child or the other children. We will not share this information with any other third parties unless in an emergency such as to health workers in the event your child becomes ill.

We may also collect and store information about the behaviour of you or your child as part of our behaviour expectations as set out in the Booking Terms and Conditions. We will discuss any issues with you first, but we may need to share this information with a school.

Information we collect from other parties other than yourselves

We generally only collect information directly from you about you and your child and sometimes information direct from your child. In some limited situations, such as where a school or local authority is providing the funding for your child's attendance, registration information about you and the child may be provided directly by them.

In addition, we may collect from other parties practical and operational information such as child whereabouts on a particular day from a school in order to ensure safe and proper collection of such children from their school activities.

Information we provide to third parties

We generally do not provide any personal data about you or your child to a third party. However, the following are times when personal data is provided to a third party:

- To any contracted activity professional who helps us run and supervise any specific activity session
- To a school or local authority or other party who is providing access to the facilities used for the activity course and where such information is needed for registering those at the facility
- Where we are required to under our OFSTED registration or other legal obligations, which may include situations where notification is needed to a regulatory or supervisory authority in connection with the welfare of the child, or otherwise.

Our legal basis for processing your personal information

When we use your personal information we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

consent: where you have given us clear consent for us to process your personal information for a specific purpose

contract: where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract

legal obligation: where our use of your personal information is necessary for us to comply with the law (not including contractual obligations)

legitimate interests: where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests)

The personal information we collect, when and how we use it

For further details on when we collect personal information, what we collect as well as how we use it, please read the following sections:

When is information is collected - When you register with us the following is collected:

What information we ask for - Contact details: your name, gender, ethnicity, email address, address, telephone number, credit or debit card information, and information relating to your child(ren) or child(ren) you care for including but not limited to their name, date of birth, gender, ethnicity, parental authority, address, school, picture, medical conditions, food allergies, religious needs, disabilities and special educational needs, behavioural information and attendance.

How and why we use your information - We ask for this to:

- to create and manage your account with us
- to communicate with you about your account
- to allow the school, childcare centre, facility or club you are registered with to provide the best level of care to your child/children
- so that the school, childcare centre, facility or club you are registered with can ensure safeguarding arrangements are in place.

We rely on contract, legal obligation and legitimate interests as the lawful bases for collecting and using the personal information.

Our legitimate interests are making sure we can keep in touch with you and provide the details to the relevant school, childcare centre, facility or club.

Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully

exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please submit a written request to In2Care's Data Protection Officer.

No fee required *

*You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

How long do we keep your data for?

We will keep this information for a maximum of one year after your schools or childcare provider close their account with us.

This policy was adopted by: In2Sport	Date: 6 th September 2022
To be reviewed: September 2023	Signed: L M Hall