



# Owls Daycare: Privacy Policy

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## 1. SUMMARY AND INTERPRETATION

- 1.1. This Policy explains the personal information we collect from you and for what reasons, how we use, store transfer such data and also how you can contact us to ask about your data and invoke your rights.
- 1.2. With this privacy policy (the "**Policy**"), we want to let you know how we at Little Scientists Club who is trading as Owls Daycare, established in the United Kingdom, with the address 18 College Parade, Salusbury Road, Queens Park, London, United Kingdom, NW6 6RL and with company registration number 10987305 (herein "**Owls Daycare**", "**Owls**", "**we**", or "**us**") promise to take care of the personal information we collect from you.
- 1.3. Such personal information includes the information you provide us with, for example, reserving a place for your child at Owls Daycare, subscribing to our mailing list, making enquiries via email and/or telephone calls, and what we learn when having you on our site such as your preferences.
- 1.4. We only collect, use, store and transfer ("**process**") your personal information in accordance with all applicable data protection legislation, including but not limited to the European Union General Data Protection Regulation (2016/679) ("**GDPR**") and applicable national data protection legislation (hereafter "**applicable law**").
- 1.5. Depending on whether you are a website visitor, customer and/or a user of our Products or services, we will process personal information including your contact details (email address, telephone number and postal address). For more information about the personal information we collect, use and otherwise process, please see section 6 below.
- 1.6. We will use your personal information for different purposes. We will for example use the data to provide you with the Product Service you have requested, to improve our Products or Services, to customise our Products or Services to you. For more information about how we use your data, please see section 7 below.
- 1.7. We may engage other companies in order to fulfil our purposes and obligations as set out in this policy, and we may transfer your personal information to countries outside the EU and EEA that may not have as strict privacy legislation as where you live. We will only transfer your personal information to such countries if we are allowed to do so, please see section 8 for more information. When we collect personal information about you, you are entitled to the following rights under applicable law:

- 1.7.1. the right to access and rectify your personal information;
  - 1.7.2. the right to object to our processing of personal information;
  - 1.7.3. the right to restrict to our processing of personal information;
  - 1.7.4. the right to demand us to delete your personal information; and
  - 1.7.5. the right to data portability.
- 1.8. For more information about the rights you have in relation to your personal information, please see sections 12-20 below. If you have any concerns as to how we use your personal information, we would kindly ask you to contact us first. However, you can always lodge a complaint with a relevant authority, specifically where you live, work or where you believe an infringement of you rights has occurred.
- 1.9. The relevant data protection authority in the United Kingdom is the Information Commissioner's Office (ICO), <https://ico.org.uk>.

## 2. WHO WE ARE

- 2.1. We are Little Scientists Club Limited trading as Owls Daycare, established in United Kingdom, with the address 18 College Parade, Salusbury Road, Queens Park, London, United Kingdom, NW6 6RL and with company registration number 10987305.
- 2.2. This Policy applies to the website operated by us including <https://owlsdaycare.co.uk>, <https://owlsdaycare.com> and all our products and services.
- 2.3. We are the controller of the personal information collected. If you have any questions or want to know more about how we use your personal information, please contact us by email to [info@owlsdaycare.co.uk](mailto:info@owlsdaycare.co.uk) or to the address stated in the beginning of this Policy.

### **3. WHO OUR PRIVACY POLICY APPLIES TO**

3.1. Our Privacy Policy applies to the following persons:

- 3.1.1. Children who attend or have attended Owls Daycare;
- 3.1.2. Parents of Children who attend or have attended Owls Daycare. Parents include fathers, mothers, legal carers/guardians and/or authorised family members;
- 3.1.3. Business partners;
- 3.1.4. Suppliers; and
- 3.1.5. All other persons who come into contact with Owls Daycare through the products or services offered by Owls Daycare.

### **4. WHAT WE PROMISE**

- 4.1. We promise to keep your data safe and to not to sell your data to third parties.
- 4.2. We promise to give you the right to access and delete your data, and to provide you with ways to manage and review your marketing choices as well as any other information (such as newsletters and email updates) you get from us.

### **5. WHAT IS PERSONAL INFORMATION?**

- 5.1. Personal information can be any information relating to an identified or identifiable natural person. In other words, it can be any information that could allow us to identify you both directly and indirectly (like for example your name, email address, IP address, or your physical address). In this Policy, we will use the word "data" to refer to all personal information we collect.

## **6. REASONS FOR PROCESSING YOUR DATA**

6.1. We will only use and process data about you if we have one of the following reason to do so:

- 6.1.1. to fulfil a contract we have with you (for example, when you have purchased a product on our website or reserved a place for your child or children with Owls Daycare).
- 6.1.2. to enable us to allow parents to reserve a place for their child with Owls Daycare
- 6.1.3. when it is our legal duty (for example, for book keeping purposes and to fulfil our obligations in relation to authorities).
- 6.1.4. when you consent to it (for example, taking photographs and/or video footage of you and/or your child/children for the purposes of advertising or promoting our products and/or services, or, where applicable when you open an account with us); or
- 6.1.5. when it is in our legitimate interest (for example, to enforce our policies, manage our everyday business, to use in an anonymised and aggregated way in order to perform statistical analysis, for direct marketing purposes, to ensure information security, to prevent fraud or to transfer the data to different part of the organisation when necessary). When we rely on a legitimate interest we have concluded that our interest is not overridden by your interests or fundamental rights and freedoms. You are welcome to contact us to learn more about how we have reached this conclusion.

## 7. WHEN WE COLLECT YOUR DATA

7.1. We will collect data about you and your child when you use or purchase our Services, including in the following situations:

- 7.1.1. When you register a Owls Daycare account.
- 7.1.2. When you complete and submit a reservation form form for your child on our website.
- 7.1.3. When, if applicable, you subscribe to our mailing list or newsletter.
- 7.1.4. When you purchase any Owls Daycare products.
- 7.1.5. When you send us an enquiry about Owls Daycare or our services.
- 7.1.6. When you contact us or our support services, via emails, letters or telephone.
- 7.1.7. When you use our websites or apps.
- 7.1.8. In customer surveys.
- 7.1.9. When you provide us with feedback.
- 7.1.10. If you participate in user research initiatives.
- 7.1.11. If you take part in our competitions or promotions.
- 7.1.12. When you click on one of our ads or on the internet.
- 7.1.13. When you make a reservation or log in to our services using third party account.
- 7.1.14. When you work for Owls Daycare. In such case, please contact our Human Resources contact separately for more information.

7.1.15. When we take video footage of or images at our Daycare Setting.

## 8. WHAT DATA WE COLLECT

8.1. We use data that you have explicitly provided to us in different situations. We also use personal information that is generated by your device (e.g. type of device, make of device etc.) or when you use our Services. These categories are further explained below. Data that you explicitly provide us with, that we collect:

- 8.1.1. Title;
- 8.1.2. First Name;
- 8.1.3. Second name;
- 8.1.4. Email address;
- 8.1.5. Contact number;
- 8.1.6. Physical address;
- 8.1.7. First name of your child;
- 8.1.8. Second name of your child;
- 8.1.9. Age and date of birth your child;
- 8.1.10. Your relationship to the child you name in the reservation form; and
- 8.1.11. Security password

8.2. The above information is provided to us when you reserve a place for your child with Owls Daycare. We may collect some or all of the information listed above when you:

- 8.2.1. contact Owls Daycare, including email or other written means, in person or by telephone

8.3. Data we collect when you use our services includes:

- 8.3.1. Usage data. This includes your internet protocol (IP) address and cookies that may uniquely identify your browser. It also includes other data about how you use our Services. We gather this data from devices you use to connect to those Services, such as computers and mobile phones, using cookies and other internet tracking software.

- 8.3.2. Location data
- 8.3.3. Platform type, such as hardware platform (PC, Android, iOS, Microsoft Xbox, Sony PlayStation and any other hardware)
- 8.3.4. Preferred language
- 8.3.5. Information about your device, hardware and software
- 8.3.6. Referral pages and page exit time

## 9. HOW WE USE YOUR DATA

9.1. We would like to use the personal data you provide to us for a variety of different purposes. For certain of these purposes it is appropriate for us to obtain your prior consent. These are as follows:

- 9.1.1. where, in the provision of our services to you and your child, or children, we need to use the information you provide to us about your child's or children's health;
- 9.1.2. where we would like to use photos or images taken of you or your child in promotional materials;
- 9.1.3. where we would like to take photographs, images and/or video footage of your child and/or children to show their progress and participation in our daycare setting to:
  - 9.1.3.1. yourselves (i.e. the parents, carers or legal guardians),
  - 9.1.3.2. other parents where your child is, or children, are also present in any photographs, images and/or video footage alongside their children,
  - 9.1.3.3. the public as part of promotional materials.



- 9.1.4. where we have exciting new services and activities which we think you will be interested in; or
- 9.1.5. where an opportunity arises to work for or with Owls Daycare.
- 9.2. We use the consent box mechanism in the consent form we provide to you to obtain your consent to our using your child's personal data for the specific purposes set out above. You can choose to give your consent to some or all of these purposes. We will comply with the choices you make.
- 9.3. In some instances we may not obtain your consent to our processing of your personal data and instead we can rely on another lawful basis in order to do so. As examples, this may be because we need to use your personal data in order to:
- 9.3.1. provide you with the services or goods you have elected to receive from us (i.e. in the ordinary course of our business);
  - 9.3.2. contact you in the case of an emergency, or unforeseen circumstances; and
  - 9.3.3. to improve our services.
- 9.4. These purposes for which we can use your personal data are set out below:
- 9.4.1. In order to perform our contractual obligations to you. This would include our fulfilling orders you have placed for Services (including online), contacting you in relation to any issues with your order or where we need to provide your personal data to our authorised personnel (including, but not limited to, all authorised teachers and administrative personnel) so that they may provide you with such Services and communicate with you about them (e.g. where there is a change to the time or location of a class).

- 9.4.2. In order to comply with our own legal obligations, e.g. health and safety legislation, or to assist in an investigation (e.g. from the Police).
- 9.4.3. In order to share your personal data with our authorised personnel (including, but not limited to, all authorised teachers and administrative personnel) so that we can add your child to the register for each class.
- 9.4.4. In order to use your personal data to operate our business, but otherwise than in performing our contractual obligations to you (and includes our providing your personal data to our authorised personnel (including, but not limited to, all authorised teachers and administrative personnel) for the same purposes). These would be our 'legitimate interests' for the purposes of Data Protection Legislation and are as follows:
- 9.4.4.1. to send you important notices such as communications about changes to our terms and conditions and policies;
  - 9.4.4.2. to assist in the investigation of suspected illegal or wrongful activity. This includes exchanging information with other companies and organisations (including Government) for the purposes of fraud protection and credit risk reduction;
  - 9.4.4.3. to deal with any misuse of the website;
  - 9.4.4.4. to provide you with important real-time information (usually by SMS text message) about classes or services you have booked (e.g. a change of time or location of the class due to unforeseen circumstances);
  - 9.4.4.5. to send you information you have requested;
  - 9.4.4.6. to deal with your enquiries;
  - 9.4.4.7. to develop, deliver and improve our Services;

9.4.4.8. to help us develop our website to be more useful to you;

9.4.4.9. for internal purposes for hosting, research, analysis, testing, monitoring, customer communication, risk management and administrative purposes;

9.4.4.10. to protect and defend our rights or property;

9.4.4.11. to sell, make ready for sale or dispose of our business in whole or in part including to any potential buyer or their advisers; or

9.4.4.12. in order to enforce or apply our terms of use, terms and conditions of supply and other agreements with third parties. In order to use the health-related personal data you provide to us about your child in order to protect the vital interests of you and your child in situations where you are physically or legally incapable of giving consent for us to do so. For example, this would enable us to make this type of personal data available to each of our authorised personnel (including, but not limited to, all authorised teachers and administrative personnel) in situations where we and/or our franchisees are required to comply with a specific legal requirement and there is not time to gain your consent. This would especially be relevant in an emergency situation.

9.4.5. sending you surveys in connection with our goods and services; and

9.4.6. notifying winners of online competitions;

9.5. We will do our best to inform you when we carry out any of the above activities, but it may be that we are unable to do so in each case.

9.6. In addition to the above, we use the information we collect from you and from your use of our Services, to provide, maintain, protect and improve the Services we offer and deliver, and to develop new ones. Where relevant, and if applicable, with your consent, we also use the

information to offer you tailored content, like giving you more relevant ads and inform you about new courses that you might be interested in. We will not use your data for any other purpose than the purpose for which the data is originally collected.

9.7. To operate our business and to enhance you and your child's/children's experience and enjoyment of our Services, we use your information in the following ways:

- 9.7.1. To operate, improve, develop and provide you with our services;
- 9.7.2. To provide you with recommendations and course offers that you may like;
- 9.7.3. To respond to enquiries, comments or feedback from you;
- 9.7.4. To understand trends in usage;
- 9.7.5. To help tracking and correcting errors and bugs in our services;
- 9.7.6. To customise your experience of our services;
- 9.7.7. To maintain the integrity and security of the services;
- 9.7.8. To provide the platform that enables the processing of transactions and communicate with you regarding these transactions;
- 9.7.9. To create reports, analyses or similar for the purpose of research and business intelligence and be able to track potential problems, behaviour and trends;
- 9.7.10. To enforce Term and Condition, Cookies Policy and this Privacy Policy;
- 9.7.11. To send you newsletters and promotional notices and offers you have previously agreed to;
- 9.7.12. To keep our services fair, investigate and prevent fraud and illegal behaviour; and
- 9.7.13. To comply with applicable laws and regulations.

## 10. WHO WE SHARE YOUR INFORMATION WITH

10.1. To be able to provide you with the Services and the best possible experience, we will share your data with other companies and organisations. We will only do so if our partners can provide the same level of security to keep your data safe as implemented by us and if our partners can ensure that they comply with applicable laws and

privacy regulations. We may share your information with the following partners:

- 10.1.1. Payment providers (for example PayPal)
- 10.1.2. Advertising partners and attribution platforms to help us understand the effectiveness of our marketing campaigns (for example, Google, Instagram, Twitter and Facebook)
- 10.1.3. Data storage providers including Wix.com.

## **11. SECURITY MEASURES TO PROTECT YOUR DATA**

11.1. We maintain physical, electronic and procedural safeguards to help guard your data in compliance with applicable privacy regulations.

## **12. IF YOU CHOOSE NOT TO SHARE YOUR DATA**

12.1. You may at any time withdraw the specific consent you give to our processing your personal data as set out in this policy.

12.2. We may need to collect data to be able to fulfil our legal obligations or fulfil the terms of a contract we have with you or to be able to even present you with the Services. If you choose not to give us this data, it may prevent us from meeting our obligations. It may also mean that we cannot perform the Services needed to run the Services you have purchased or policies. It may also mean that we have to cancel a product or Service you have with us. Any data collection that is optional will be clearly indicated as such at the point of collection.

## **13. HOW LONG WE WILL KEEP YOU DATA**

13.1. We will only hold your personal data for so long as is necessary for us to do so, however because this depends in each case on how each of our customers interact with us, we keep the length of time that we hold your personal data for under continual review. To do this we regularly review the personal data we hold and which of our customers are still receiving our services. Where we no longer need to process

your personal data for the purposes set out in this Privacy Notice then we will delete your personal data from our system. This means that if you or your child does not attend Owls Daycare a long period of time and then return to us then we may not have retained your details. In such instances, you may need to enrol with us again in order to receive our goods and services.

13.2. We may keep your information for longer for research or statistical purposes. If we do, we will make sure your information is anonymised and non-traceable to you as a person. We will also keep it for longer if we cannot delete it for legal or regulatory reasons.

13.3. We will however delete all data that is no longer necessary after a reasonable period. For example, any inactive Owls Daycare account will after a period of two years be deleted.

13.4. We will also delete data upon request. For more information, please read section 16 of this Policy

#### **14. ACCESSING, CHANGING AND UPDATING YOUR DATA**

14.1. You have the right to access the data relating to you. This includes the right to be informed whether or not data about you is being processed, what data about you is being processed, and the purpose of the processing. You also have a right, upon your request, to access information about any evaluation or assessment of the balancing test we are required to conduct when we process your data based on our legitimate interest. Furthermore, you have the right to rectify or add data if the personal information is inaccurate or incomplete. As soon as we become aware of any inaccurate personal information being processed, we will always rectify your data without undue delay and notify you accordingly.

#### **15. RIGHT TO OBJECT TO THE PROCESSING OF YOUR DATA**

15.1. You are also entitled to object to the processing of your data on grounds related to your particular situation. Please note however, that we must still process some personal information about you to provide

the Services to you. This means that you cannot object to all our use of personal information and still require us to provide Services to you.

## 16. RIGHT TO ERASURE

16.1. You are entitled to request that we erase data related to you. We will erase your data upon request provided that it is no longer necessary for the purpose (for example you cannot require all personal information about you to be erased and still receive Services from us) or we have a legal obligation to store personal information.

## 17. RIGHT TO RESTRICTION

17.1. You are entitled to require us to restrict our processing of your personal information if you contest the accuracy of the data, if the processing is unlawful but you do still not want us to erase the data, if the data is no longer needed to fulfil the purpose it was collected for or you have informed us that you do not consider us to have a legitimate interest for certain processing.

## 18. HOW TO GET A COPY OF YOUR DATA OR RECEIVE A COPY OF YOUR DATA

18.1. You can request a copy of your data by requesting it from us in writing, either by email to [info@owlsdaycare.co.uk](mailto:info@owlsdaycare.co.uk) or by letter to our physical addresses provided at the top of this Policy.

18.2. If you request access to personal information about you that you yourself have provided and (i) if the personal information is being processed automatically and (ii) in accordance with a contract between you and us or based on your consent, you may request that the data is provided in a structured, commonly used and machine-readable format and you may also request that the personal information is transmitted to another controller, if this is technically feasible.

## 19. HOW TO ENFORCE YOUR RIGHTS

- 19.1. You can contact us in writing, either by email to [info@owlsdaycare.co.uk](mailto:info@owlsdaycare.co.uk) or by letter to our physical addresses provided at the top of this Policy to get a list of all the data we have collected from you or to get such data deleted or invoke your other rights as explained above. We will do our best to answer your request in a timely manner but please note that it may take a couple of working days. Thank you for your patience and understanding.
- 19.2. Please note that if we cannot identify and guarantee who you are, we might ask you to provide us with additional information. Please note that we will not delete any data if we are unable to verify that you are their rightful owner. We will however always use our best effort to help you out.

## 20. HOW TO WITHDRAW YOUR CONSENT

- 20.1. You can withdraw your consent to our processing of your personal information at any time. However, we will no longer be able to provide you with certain products or Services.

## 21. CHANGES IN OUR PRIVACY POLICY

- 21.1. This Policy may change from time to time. Any changes to this Policy will be posted on this page and on our websites, <https://owlsdaycare.co.uk> and <https://owlsdaycare.com>, and if the changes are significant, we will provide you with a more noticeable notice, like for example by email. If you are asked to accept material changes to this Policy and decline to do so, you might not be able to continue using our Services.

## 22. HOW TO CONTACT US AND HOW TO RAISE A COMPLAINT WITH US

- 22.1. Please let us know if you are not happy with the way we use and process your data by contacting in writing, either by email to



[info@owlsdaycare.co.uk](mailto:info@owlsdaycare.co.uk) or by letter to our physical addresses provided at the top of this Policy.

22.2. We will also appreciate to get feedback from you if you think that this Policy or any part of it is unclear. Our address is LITTLE SCIENTISTS CLUB LIMITED, 18 College Parade, Salusbury Road, Queens Park, London, United Kingdom, NW6 6RL.

22.3. You always have the right to lodge a complaint with the relevant authority in particular where you live, work or where an alleged infringement of the GDPR has occurred.

### **23. OTHER USEFUL INFORMATION**

23.1. Information about privacy rights for can be found on <https://www.eugdpr.org/>