

Kudos Childcare Privacy and Cookie Policy

WHO ARE WE?

We are a leader in childcare services innovation.

OUR COMMITMENT

Kudos Recruitment and Coaching Limited (**Kudos Childcare, we, or us**) is committed to conducting its business in accordance with all applicable data protection laws and regulations and in line with the highest standards of ethical conduct.

This Policy sets out information about how we collect, use, store and transfer personal data which we receive through our website kudoschildcare.co.uk (the **Site**) or otherwise. That personal data might relate to users of our Site, actual or prospective users of our services (such as nannies or families), commercial partners, and any other individuals with whom we deal in the course of our business. We are a data controller in relation to that personal data, which means we determine the purposes and means of the processing of that personal data.

At Kudos Childcare, we strive to ensure continued and effective implementation of this Policy and expect our employees and third parties engaged by us to share in this commitment.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. If you have any concerns or need further information, our GDPR Compliance Manager and data protection representatives can be contacted directly here:

Kudos Recruitment and Coaching Limited

71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ

E-mail: compliancehelpdesk@kudoschildcare.co.uk.

SUMMARY

Full details are set out in the relevant sections of this Policy below, but in summary:

- we normally receive your personal data from you, but sometimes it might be from a third party with whom we are mutually acquainted (e.g. in the context of a referral);
- if you are a parent or guardian, then we will process personal data relating to you and your children to the extent you have provided it to us;
- we use your personal data to deliver our services, conduct our business, keep appropriate records and meet our legal obligations;
- we only provide your personal data to third parties for our business purposes or as permitted by law. We don't share your data with third party advertisers;
- we store personal data for specified periods;
- you have legal rights in relation to your personal data which you can exercise on request;
- the Sites use cookies; and
- you can contact us to enquire about any of the contents of this Policy.

Importantly, this Policy relates only to the personal data which we receive and use. If you're a parent engaging a nanny, then you will likely provide your nanny with personal data relating to you and to your

family. The nanny's use of that personal data will be governed by your own contract with him or her and by any privacy notice or policy issued by him or her.

PERSONAL DATA WE COLLECT AND USE

In this Section we have set out the kinds of personal data that we may collect, use, store and transfer. We have grouped that data together into different categories based on its subject matter, and based on the kinds of individuals to whom the personal data relate.

Data relating to almost everyone we deal with: e.g. Site users, enquirers, suppliers

We may process data about your use of our Site (**usage data**), which we obtain through our analytics tracking systems. The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.

We may process the contact details you provide to us (**contact data**), such as your first and last name, job title, email address, postal, correspondence or billing addresses, and/or telephone number(s).

We may process information contained in or relating to any enquiry or communication that you send to us or that we send to you (**correspondence data**). This could for example include customer support queries from our users (whether parents or nannies), enquiries from journalists or any other correspondence. The correspondence data may include the communication content and metadata associated with the communication, as well as any contact data you may provide to us in the context of that correspondence.

Data relating to registered users of our Site or services:

We may process the account data (**account data**) you provide to us in setting up or using an account via the Site, or in engaging with us offline to provide services to you (whether as a nanny or parent). The account data may include your contact data, date of birth, username and password, and account settings (such as preference settings). If you use a third-party application like Facebook or Google Accounts to log into your account on our website then we may receive and process account data from the relevant third party. Account data may also include account-related records (for instance, the record of the engagement of a nanny by a parent).

We may process any personal data which you include in any listing, comment, message, feedback or other submission you upload or post to our Site or provide to us for publication on our Site. We call all of this **user-submitted content data**. We do not pre-moderate or have any control over what you include in user-submitted content data, so we ask that you carefully consider your own privacy in deciding what to include in it. Because user-submitted content data is determined by you, it could potentially include *special categories of data*, such as data about *race, ethnic origin, politics, religion, health, sex life or sexual orientation*, although we ask that you avoid including any such data unless utterly necessary.

We may process information relating to payments we make to you or receive from you (**payment data**), which may include your contact details, your bank account details, national insurance numbers in the case of nannies or parents and the transaction details. **We do not collect or process your credit or debit card details when you make payments through the Site or in relation to our services.** We use a payment processing service provider and it is the payment processing service provider who will collect and process your card details.

Data relating to nannies

If you are a nanny, or applying to use our service as a nanny, then in addition to contact data, account data and payment data we may process personal data provided by you relating to your experience, qualifications, registration with OFSTED, place of study, rights to work in the United Kingdom, references and criminal record, as well as the contents and notes of any interview we may conduct with you electronically, over the telephone or in person and details of courses you may complete (all of which we'll call **nanny check data**). If permitted or required by law, we may process data relating to your health and fitness to work as part of the nanny check data. This is **special category data** which is subject to additional protections.

If you are a nanny, or applying to use our service as a nanny, then we may ask you to obtain a DBS check or provide a copy of one, or we may conduct one on your behalf, in each case subject to your prior written consent.

If you are a referee providing a reference for a nanny then the nanny check data may also include your name and the contents of your reference.

Data relating to family

We may receive personal data from parents or nannies relating to the family which is either looking for or receiving child care services. We call this **family data**. This information will include contact data, account data and payment data. It may also include additional information such as:

- the name and date of birth of children to be looked after;
- allergies and dietary requirements in relation to your children;
- information, related to special needs or medical history;
- emergency contact details, school or doctor contact details, and contact details for parents or guardians.

If you provide us with information relating to your family, then you must do so as their parent or guardian in relation to children, or with their permission in relation to adults (such as your spouse or partner).

Some of the family data may be **special category data** which is subject to additional legal protections. This could include information relating to your or your children's health, racial or ethnic origin or religious or philosophical beliefs.

Data relating to suppliers and other commercial partners

If we have some other commercial relationship with you or with your employer (for example, a supply, purchase, sponsorship or referral relationship) then we may handle contact data, correspondence data and any related documents (such as contracts, POs and invoices, proposals and so on). We call all of this **partner data**, and we process it for the purposes of administering our commercial relationship with you.

Personal data we obtain from others

Your personal data may be provided to us by someone other than you. For example, we might:

- be introduced to you in correspondence by a mutual acquaintance;
- receive your contact details from a nanny who has asked that we contact you as a reference;
- receive personal data through your social media account if you use it to log in;
- receive personal data through other users of the Site or our services (for instance, if a parent sends us feedback in relation to a nanny or vice versa); or
- received personal data through a third party agent (for example, if you apply for a nanny role through an intermediary).

Normally this data will be contact data, correspondence data, user-submitted content data or partner data as described above.

We might also conduct our own market research in relation to potential nannies or commercial partners and might obtain some personal data in doing so (for example, we might contact you if you have a public-facing profile, for example on LinkedIn, which suggests we might be able to work together).

Aggregate and anonymised data

We may derive anonymised, aggregate data from some of the other personal data provided to us (for example, analysis of usage data, or statistical or demographic data). Because it is anonymised, aggregate data is not treated as personal data under applicable law. We might also use data collected through the Site, or through telephone conversations or face-to-face interviews, for research purposes in anonymised form. Again, because it is anonymised, this data is not treated as personal data under applicable law.

HOW WE USE YOUR PERSONAL DATA

We have set out below, in table format, a description of all the ways we may use your personal data. We're also required by law to identify the **legal basis** on which we handle personal data. These legal bases are set out in Article 6 of the General Data Protection Regulation (**GDPR**). When we process personal data on the basis of our **legitimate interests** then we also need to identify those legitimate interests and have done so below.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us via email at complinedesk@kudoschildcare.co.uk if you would like further information.

Type of Data	Purpose/Activity	Legal Basis for Processing
Usage data	Analyzing the use of, and improving, our Site and services, security monitoring and fraud detection and to ensure the Site is presented in the most effective manner.	Our legitimate interests (Art 6.1(f) GDPR), namely delivering and improving our Site, informing marketing strategy, and ensuring the security of the Site.
Contact data and correspondence data	To communicate with you. If you have indicated your interest in our services then we may also process correspondence data to provide you with occasional news about our services and marketing communication about goods and services which may be of interest to you (although you will be free to unsubscribe, or manage your preferences, at any time). We may from time to time contact you to invite you to take part in a prize draw or	Our legitimate interests, namely properly administering our business and communications, developing our relationships with interested parties and addressing user concerns and queries. Where correspondence data relates to marketing, our legitimate interests in developing our business. Where correspondence relates to registered use of our Site, or to any contract or potential contract with you, then our legal basis may be for the performance of a contract with you, or to take steps at your request

	competition or complete a survey.	prior to entering into a contract with you (Art 6.1(b) GDPR).
Account data	Operating our Site, providing our services, registering you as a user of our services, ensuring the security of our Site and services, verifying logins, and communicating with you.	Performance of a contract with you (i.e. delivering our services through the account). Our legitimate interests, namely properly administering our business, services and communications.
Account data, nanny check data	Confirming the suitability of nannies to provide child care services. Considering nannies' applications in relation to potential future opportunities.	Performance of a contract with you (i.e. conducting checks as agreed in our terms of service, or conducting checks in preparation to entering into a contract). Our legitimate interests, namely providing assurance of a safe user experience to parents.
Account data, nanny check data	Assisting nannies with registration with OFSTED (on the Voluntary OFSTED Childcare Register)	Performance of a contract with the nannies (i.e. assisting them as agreed in our terms of service).
Health information contained in nanny check data	Assessing the fitness of nannies to work, helping to ensure any reasonable adjustments are made to take account of disability	The nanny's consent (Art. 6.1(a) GDPR, Art. 9.2(a) GDPR).
Criminal record information contained in nanny check data	Confirming the suitability of nannies to provide child care services.	The nanny's consent.
User-submitted content data	Operating our Site, providing our services, publishing user comments and feedback, assessing user reviews.	Our legitimate interests, namely operating our Site and services and ensuring a good user experience through comments, listings and feedback.
Special category data contained in user-submitted content data	Operating our Sites, providing our services, publishing user comments and feedback.	The user's consent.
Payment data	Making and receiving payments to and from our users.	Performance of a contract with the relevant users (i.e. taking payment, and facilitating payment, as described in our terms of service).
Account data, contact data, correspondence	Administering benefits and payroll in relation to nannies.	Performance of a contract with the relevant users (i.e. administering

data, nanny check data, payment data		benefits and payments as agreed in our terms of service).
Family data	Administering our services, liaising between parents and nannies.	Performance of a contract with the family member (i.e. delivering our services). Our legitimate interests, namely properly administering our business, services and communications.
Special category data contained in family data	Ensuring that nannies are appropriately briefed on special needs and allergies for safety purposes, and (where you have determined it to be relevant) on the religious and family context in which you are raising your child.	The family member's consent.
Partner data	Administering our commercial relationship with those with whom we do business.	Performance of a contract with the relevant partner. Our legitimate interests, namely properly administering our business and communications, and developing commercial relationships.
Contact data, correspondence data, account data, usage data, user-submitted content data	To form a view on what we think you may want or need, or what may be of interest to you, in order to inform the marketing communications we send to you.	Our legitimate interests, namely ensuring our marketing activities are tailored to your needs.
Contact data, correspondence data, payment data, partner data	To conduct credit checks or third-party ID checks and to recover debts	Our legitimate interests, namely avoiding credit risk or fraud, and ensuring we are able to recover debts.
Any personal data	For the purposes of legal compliance (e.g. maintaining tax records)	Compliance with our legal obligations (Art 6.1(c) GDPR).
Any personal data	For the purposes of bringing and defending legal claims	Our legitimate interests, namely being able to conduct and defend legal claims to preserve our rights and those of others.
Any personal data	Record-keeping and hosting, back-up and restoration of our systems,	Our legitimate interests, namely ensuring the resilience of our IT systems and the integrity and recoverability of our data.

MARKETING COMMUNICATIONS

You can ask us or third parties to stop sending you marketing messages at any time by:

- by following the opt-out links on any marketing message sent to you; or
- by contacting us via email at compliancehelpdesk@kudoschildcare.co.uk

PROVIDING YOUR PERSONAL DATA TO OTHERS

Our advisors. We may disclose your personal data to our insurers and/or professional advisers such as lawyers or accountants to take professional advice and manage legal disputes.

Disclosures designated by you. We may disclose your personal data to third parties designated by you, such as other users of the Site to whom you show public information such as user-submitted content data, or between parents and nannies.

Our service providers. We may disclose personal data to our service providers or subcontractors in connection with the uses we've described above. For example, we may disclose:

- any personal data in our possession to suppliers which host the servers on which our data is stored, or to freelance staff whose duties involve handling the relevant personal data;
- contact correspondence data to providers of email or email marketing services (for example, in order to send out service messages or newsletters to our users);
- account data to IT support service providers;
- account data, correspondence data and payments data to third parties who provide payroll, pensions and similar administrative services in relation to the nannies who use our services;
- payments data to our payment processing service providers;
- usage data to providers of analytics services; and
- partner data and other relevant personal data to third parties for the purposes of fraud protection, credit risk reduction and debt recovery.

We do not allow our data processors to use your personal data for their own purposes. We only permit them to use your personal data for specified purposes, in accordance with our instructions and applicable law.

Third party advertisers. We may share personal data with advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We will always obtain your consent before doing so.

Compliance. We may also disclose your personal data where necessary to comply with law.

Restructuring. If any part of our business is proposed to be sold or transferred, your personal data may be disclosed to the new owner or in connection with the relevant negotiations.

WHERE WE STORE YOUR DATA

When we store your personal data in our own systems, it is stored within the European Economic Area (EEA).

Some of the third parties to whom we may transfer your personal data, discussed above, may be located outside the EEA or may transfer your personal data to their own service providers located outside the EEA. If so, then we will ensure that transfers by our appointed data processors will only be made lawfully (e.g. to countries in respect of which the European Commission has made an "adequacy decision", or with appropriate safeguards such as the use of standard clauses approved by the European Commission or the use of the EU-US Privacy Shield). You may contact us if you would like further information about these safeguards.

Personal data that you submit for publication through our Site or services or otherwise make visible to other users may be available, via the internet, to others around the world. We cannot prevent the use (or misuse) of such personal data by others.

DATA SECURITY

We have put in place appropriate security measures to protect your personal data. We also have procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where required by law.

Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem.

RETAINING AND DELETING PERSONAL DATA

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In particular, where we have a contractual relationship with you we will keep all associated data for the duration of that relationship and for seven years afterwards (both to ensure that we have maintained records for the limitation period applicable under UK law to contractual claims, and to ensure that we have met HMRC requirements to maintain tax-related records).

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

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

In summary, these rights include the rights 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 your 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 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 transfer of your personal data to you or to a third party.** You can request that 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.
- **Right to 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 contact us via email at compliancehelpdesk@kudoschildcare.co.uk or via the Contact Us page on our website <http://www.kudoschildcare.co.uk>. All of these rights are complex and may be subject to specific exclusions or limitations on their exercise. Further information on your rights is available from the ICO’s website at www.ico.org.uk.

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.

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.

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.

COOKIES

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity which is in line with the processing activities outlined in this Policy.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user (except for IP addresses in some cases), but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We use or may in future use these kinds of cookies:

- **Strictly Necessary Cookies:** these cookies are essential to provide you with services available through our Site and to enable you to use some of its features. For example, they allow you to log in to secure areas of our Site and help the content of the pages you request load quickly. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.
- **Functionality Cookies:** These cookies allow our Site to remember choices you make when you use our Site, such as remembering your login details and remembering the changes you make to other parts of our Site which you can customise. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Site.
- **Analytical/Performance Cookies:** These cookies are used to collect information about traffic to our Site and how users use our Site. It includes the number of visitors to our Site, the websites that referred them to our Site, the pages that they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information and to monitor the level of activity on our Site.
- **Social Media Cookies:** These cookies are used when you share information using a social media sharing button or "like" button on our Site or you link your account or engage with our content on or through a social networking website such as Facebook, Twitter or Google+. The social network will record that you have done this.
- **Google Analytics:** The Sites use Google Analytics (an analytical/performance cookie) to help analyse how users use the Sites, collecting standard internet log information and visitor behaviour information in an anonymised form from which no user is identifiable. This information is transmitted to Google and processed to compile statistical reports on activity on the Sites. These reports allow us to optimise our user experience. Google provide a

browser add-on for users who wish to prevent their data from being used by Google Analytics. Further information is available at <https://tools.google.com/dlpage/gaoptout/>.

- **Third Parties:** Third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can obtain up-to-date information about blocking and deleting cookies via the support pages made available by your browser operator.

OTHER WEBSITES AND THIRD PARTIES

The Site may contain links to third party websites and refer to third party service providers and other entities. If you follow a link to any third party website or deal with any third party referred to on the Sites, then they may have their own privacy and cookie policies, and we are not responsible for their use of any personal data which you may provide to them.

CHANGES TO OUR PRIVACY POLICY

At Kudos Childcare, we keep this Policy under regular review to continuously capture each requirement and we will place any updates on the Site. We may notify you of significant changes to this Policy using the contact details you have given us.

HOW TO COMPLAIN

We do believe that we can resolve any query or concern you may raise about our use of your Personal Information. The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular within the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws may have occurred. The supervisory authority in the UK is the Information Commissioner (ICO) who may be contacted at:

Online: <http://ico.org.uk/concerns/>

Telephone: 0303 123 1113.

DATA PROTECTION REGISTRATION

We are registered as a data controller with the UK Information Commissioner's Office. Our data protection registration number is ZA480510.

HOW TO CONTACT US

Please contact us if you have any questions about our privacy policy or how we process the information we hold about you:

By email: compliancehelpdesk@kudoschildcare.co.uk

Or write to us at:

The Compliance Unit,

Kudos Recruitments and Coaching Limited

71-75 Shelton Street Covent Garden, London, United Kingdom, WC2H 9JQ

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