



## WayMakers Data Website Privacy Notice

This privacy notice provides you with details of how we collect and process your personal data through your use of our site <http://www.waymakers.co.uk> including any information you may provide through our site when you consider our service or sign up to our newsletter.

We need to collect and use certain types of personal information about the people we deal with, such as current, past and prospective parents, suppliers, affiliates, employees, professional contacts and others with whom we communicate.

In addition, we may occasionally be required, by law or via our professional body to collect, use and share certain types of personal information to comply with the requirements of government departments, agencies and regulators.

Under the Data Protection Legislation, all organisations which handle personal information must comply with a number of important principles regarding the privacy and disclosure of this information.

We believe that the lawful and correct treatment of personal information is critical to our successful operation. We recognise that to maintain our professional reputation and integrity, we must be fully compliant with this legislation.

By providing us with your data, you warrant to us that you are over 13 years of age.

### Data Protection Legislation

In the United Kingdom and the European Economic Area (EEA), "Data Protection Legislation" means all applicable data protection and privacy legislation or regulations including The Privacy and Electronic Communications (EC Directive) Regulations 2003 (also known as PECR) and any guidance or codes of practice issued by the European Data Protection Board or the Information Commissioner, together with:

- prior to 25 May 2018, the UK Data Protection Act 1998; and
- from 25 May 2018 onwards Regulation (EU) 2016/679 (the "General Data Protection Regulation" or "GDPR"), as amended by the UK Data Protection Act 2018.

We fully endorse and adhere to the principles of data protection set out in the Data Protection legislation and will:

- fully observe the conditions regarding the fair collection and use of personal information.
- meet our legal obligations to specify the purposes for which we use personal information.
- only collect and process the personal information needed to carry out our business or to comply with any legal requirements.
- ensure that the personal information we use is as accurate as possible.
- ensure that we don't hold personal information any longer than is necessary.



- ensure that people know about their rights to see the personal information we hold about them.
- take appropriate technical and organisational security measures to safeguard personal information; and
- ensure that personal information is not transferred abroad without suitable safeguards.

Additionally, we will ensure that:

- there is someone with specific responsibility for data protection in the organisation - Alex Kelly who can be contacted on [alex@waymakers.co.uk](mailto:alex@waymakers.co.uk)
- we regularly review and audit how we handle personal information.
- the ways we handle personal information are clearly described.
- everyone handling personal information understands that they are responsible for following good practice.
- everyone handling personal information is appropriately trained and properly supervised.
- we regularly assess the performance of people who handle personal information.
- anybody wanting to make enquiries about handling personal information knows what to do; and
- Queries about handling personal information are dealt with properly and courteously.
- If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.
- It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [alex@waymakers.co.uk](mailto:alex@waymakers.co.uk)

### **The types of personal data we collect and use**

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender, National Insurance numbers.
- **Contact Data** may include your billing address, delivery address, email address and telephone numbers.
- **Financial Data** may include your bank account details and other financial details.



- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.

## **Sensitive Data**

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

## **Using your personal data: the legal basis and purpose**

We will process your personal data:

- As necessary to perform our contract with you and to update our records

As necessary for our own legitimate interests e.g. for good governance and managing our business operations and to send you information and your interests and fundamental rights do not override those interests.

- As necessary to comply with a legal obligation e.g. when you exercise your rights under data protection law and make requests; for compliance with legal and regulatory disclosures, for establishment and defence of legal rights; to verify your identity and anti-money laundering checks.
- Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at [alex@waymakers.co.uk](mailto:alex@waymakers.co.uk)

## **Change of purpose**

- We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please contact Alex Kelly on [alex@waymakers.co.uk](mailto:alex@waymakers.co.uk)
- If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

## **DISCLOSURES OF YOUR PERSONAL DATA**

Subject to applicable data protection law we may share your personal data with:



- Government bodies and agencies in the UK;
- Sub-contractors and other persons who help us provide our services;
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Service providers who provide IT and system administration services.
- Courts, to comply with legal requirements;
- In an emergency or to otherwise protect your interests;
- Anyone else where we have your consent or as required by law.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Data retention periods**

- 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 unauthorised 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.
- By law we must keep basic information about parents (including Contact, Identity, Financial and Transaction Data) for seven years after we stop working with your child.



***In some circumstances we may anonymise 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 rights under applicable data protection law**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please contact Alex Kelly on [alex@waymakers.co.uk](mailto:alex@waymakers.co.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.

### **THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice.