

# **NurseryWeb Privacy Statement**

# Updated: April 24, 2018

NurseryWeb is committed to protecting your personal information in accordance with fair information practices and applicable data protection laws and regulations. NurseryWeb and any affiliated organizations that handles personal data, is responsible for ensuring compliance with the data protection requirements outlined in this statement.

# The GDPR:

relates to The General Data Protection Regulations due to come into effect on 25th of May 2018.

# **1.0 Introduction**

At NurseryWeb, we value our customers and respect their privacy while using our website. The following statement as listed will assist you to how we collect, use and safeguard information that you have provided to us on the website.

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# 2.0 Data Protection Policy

#### 2.1 Data Protection Officer

NurseryWeb has appointed the Director of Software Architecture as the Data Protection Officer (DPO) who will ensure that all personal data is obtained and processed in a manner that complies with this statement and data protection laws.

#### 2.2 Data Protection by Design

All IT systems, processes and applications have undergone strict assessments are reviewed in accordance with GDPR requirements. An annual data protection compliance audit will be performed to ensure an adequate level of compliance with data protection laws and GDPR.

#### 2.3 Data Protection Principles

#### 2.3.1 Principle 1: Lawfulness, Fairness and Transparency.

Personal Data will only be collected for one of the purposed specified in the applicable Data Protection regulation and the method of processing that will occur will be thoroughly explained to the Data Subject. By providing Personal Data, Subject consent to the use of data to fulfil the purpose of collection or as requested by Subject.

#### 2.3.2 Principle 2: Purpose Limitation.

Personal Data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible or exceed those purposes.

#### 2.3.3 Principle 3: Data Minimisation.

Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed and used.

#### 2.3.4 Principle 4: Storage Limitation.



In line with Principle 3, Personal Data shall be kept for no longer than necessary for the purposes outlined to the Subject.

#### 2.3.5 Principle 5: Accuracy.

Personal Data which needs to be stored for a defined period of time as requested must be kept accurate and up to date, thus out of date and redundant data shall not be retained unless specified by Subject.

#### 2.3.6 Principle 6: Integrity & Confidentiality.

Personal Data shall be processed and stored in a manner that ensures appropriate security of data, including protection against unauthorised processing and accidental loss, destruction or damage.

### 3.0 Data Processing

#### 3.1 What Type of Information Collected by NurseryWeb?

NurseryWeb is the sole owner to collect information on this website from our users. We do not provide any personally identifying information from users unless it is voluntarily provided to us from our support forms and contact us form. This form will include contact name, company name, country, email address, contact number and certain other information so that we are able to support you and provide you with the information as you have requested. You have no obligation to provide us with all this information, while without providing this information will not affect your ability to browse all functions of our website.

#### 3.2 Where do NurseryWeb store your data?

We only store data on our NurseryWeb managed secured environment, your data will never be transmitted outside of the UK unless you have specially requested us to do.

#### 3.3 How long does data is retained?

Personal data will not be retained for longer than necessary in relation to the purposes for which it was originally collected. All personal data shall be deleted as soon when the purpose of collecting is fulfilled and there is no longer a valid reason to retain.

#### 3.4 How NurseryWeb Use Any Information Collected?

When you provide your personally identifying information to us, you have been communicated that you are knowingly and voluntarily providing us the information. We will not sell or rent and share your personally identifying information to any third party outside of NurseryWeb unless it is needed to fulfill your request, e.g. to fulfill an order or regarding the reason you contacted us. When you access to this site, you consent to the transmission of your personally identifying information provided to us and to its use as described herein. The information provided may release when we believe release is appropriate to comply with law or to protect our rights.

#### 3.5 Safeguard Information Collected / Data Security

NurseryWeb is alert of your personally identifying information and take precautions to protect it. When you have provided us your sensitive information via the website, your information is protected both online and offline. This site does not store any personally identifying information online. Any of the information you have submitted to us via any forms on this website or email is being protected offline. Your personally identification information will only be used by our employees, who needed the information to perform specific job, e.g. billing or customer service. The computers and servers which we store your personally identifiable information are kept in a secure environment. A variety of security measures are implemented when a user enters, submits, or accesses their information to maintain the safety of personal information.

NurseryWeb respects all the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unauthorizes or unlawful processing of personal data.

#### 3.6 Data Subjects Accuracy



Data subjects must notify the data processor of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about the data subject is erased.

#### 3.7 Staff

NurseryCam staff is aware of the importance of keeping personal data safe and secure. Regular brief and updates on data protection practices to ensure staff maintain data integrity.

### **4.0 Website Hosting**

#### 4.1 Data Security Protection

#### 4.1.1 Secure Parent Accounts

**Individual Parent Account (6)** - Each parent has an individual password account. No account sharing is allowed, even between mum and dad. This enables us to closely monitor each account and catch any suspicious activity. Issuing of lost/stolen passwords will be restricted to an automated process.

Secure Parent Account Application Process (8) - Every parent has to obtain a secret PIN from their nursery before being able to submit an application through our secure application process. The account is only activated after the application has been reviewed and approved by the nursery management. In this process, not even the nursery owner knows the parent's account password.

#### 4.1.2 Secure Nursery Control Panel

**Full control over Parent Accounts (10)** - Nursery managers have full control of all parent accounts. Only the authorized manager can approve, suspend or delete parent accounts.

#### 4.1.3 Secure Central Server Protection

**Watchdogs (4)** - Watchdogs are programmed to routinely check all gateways and detect any suspicious activity or multiple failed attempts. If detected, our security staff are immediately alerted.

**Firewalls (5)** - Firewalls are used to prevent unauthorised internet users from accessing NurseryWeb servers. Each message entering or leaving the NurseryWeb servers are examined and those that do not meet our specified security criteria are automatically blocked.

**24 Hours Security Monitoring (12)** - Our dedicated monitoring team operates 24/7 to ensure that the highest security standard is maintained at all times. An abused account would be suspended immediately and dealt by our security personnel directly.

#### 4.1.4 Centralised Architecture

Most hackers don't crack into the systems by brute force. Banks and military organisations are often vulnerable because their systems involve many people and multiple access points. The NurseryWeb central server is built on a simple, proprietary platform where it is protected by layers of security functions which close off all possible loopholes.

#### 4.1.5 Website Data

All photos, images or text deployed on the website is subject to prior consent from the nursery. When you provided us with any form of website updates material, you consent to the transmission of your personally identifying information provided to us and to its use as described herein. NurseryWeb will not share these photo, images or data pertaining to the website across different platforms or customers.

NurseryWeb used Fasthosts and Nominet website service provider who are GDPR compliant. To find out more visit <a href="https://www.fasthosts.co.uk/terms/privacy-policy">https://www.fasthosts.co.uk/terms/privacy-policy</a>, <a href="https://www.nominet.uk/resources/privacy-policy/">https://www.nominet.uk/resources/privacy-policy/</a>



# **5.0 Email Service Hosting**

NurseryWeb used Mail Enable email service provider <u>https://www.mailenable.com/policies/privacy.asp</u> to host the email services for nurseries.

Personal data will not be retained for longer than necessary in relation to the purposes for which it was originally collected. All personal data shall be deleted as soon when the purpose of collecting is fulfilled and there is no longer a valid reason to retain. Any data for evidential purpose will be retained until the purpose of collecting is fulfilled or as requested by nursery.

### 6.0 Cookies

NurseryWeb use browser "cookies" on this site. A cookie is a piece of data stored on a site visitor's hard drive to help us on improving your future access to our site. The cookies we use will not provide any personally identifying information about you or provide us any way to contact you, furthermore, the cookies will not extract any information from your computer. The cookies we use may identify repeat visitors to our site. As say for instance, when we use a cookie to identify you, you would not have to log in a password more than once and therefore saving time for you while accessing our site. Kindly take note that our site does not require any log-in to view it, browser cookies may still be created for non-personally-identifying visit information. Cookies may enable us to track and target the interests of our users thus enhance the experience on our site. Usage of cookie will not linked to any personally identifiable information on our site.

### 7.0 Google AdWords' Remarketing

NurseryWeb utilize Google AdWords' remarketing to advertise advertisement trigger across the Internet. This AdWords remarketing will display relevant ads tailored to you based on parts you have viewed on NurseryWeb website by placing a cookie on your machine. This cookie will not in any way to identify you or give access to your computer. The cookie is meant to "This person visited this page, so show them ads relating to that page." Google AdWords Remarketing will allow us to tailor our marketing to better suit your needs and only display ads that are relevant to you.

Visitors may opt-out of Google's use of cookies by visiting <u>Google's Ads Settings page</u>. Alternatively, you may also opt-out of a third party vendor's use of cookies by visiting the <u>Network Advertising Initiative opt-out page</u>.

# 8.0 Breach Reporting

Any individual who suspects that a Personal Data Breach has occurred must immediately notify us at <u>support@nurseryweb.co.uk</u>, providing a description of what occurred. Once confirmed that a Breach has occurred, the Data Protection Officer and relevant officers will follow the relevant procedure based on the criticality and quantity of Personal Data involved. We view a Breach in Personal Data as serious offense. Immediate investigation shall commence and notification email will be sent to inform on the commencement of investigation. A full report of the Breach will be generated after the investigation is completed and sent to relevant individuals and nursery for report purpose.

# 9.0 Updates and Enquiries

Our Privacy Statement may vary from time to time and all updates will be posted on this page if any changes made. This statement is maintained and reviewed periodically to reflect the updated privacy laws and GDPR compliance. NurseryCam's Data Protection Officer is responsible for accuracy and maintenance of this policy. If you have any questions or enquiries regarding our Privacy Policy, kindly send us an email to support@nurseryweb.co.uk.