

Kool Kidz Group Privacy Policy

Policy Document

Date: 23rd May 2018

Table of Contents

1	Introduction	3
2	Terms	3
3	About Us	4
4	Key Questions our Privacy Policy Answers	4
5	Use of Our Website	5
5.1	Passwords for The Website.....	5
5.2	Information We Process	5
5.3	Personal Information	5
5.4	Data We Store on Our Website	5
5.5	Technical Information.....	5
5.6	Cookies.....	5
5.7	Third-Party Analytics.....	6
6	Accessing Your Personal Information & Communication Preferences	6
7	How We Use & Share your data	6
8	Security of Your Information	7
9	Children’s Data	7
10	External Websites	7
11	Offline Data Processing	8
12	Changes to This Privacy Policy	9
13	Contact Us	9
14	Version History	9

1 Introduction

Kool Kidz Group are committed to protecting your privacy and providing a safe online experience. For **Kool Kidz Group** offline privacy policy statements, please find the relevant section below.

GDPR stands for "The General Data Protection Regulation", which super-cedes the Data Protection Act (1998).

The aim of the GDPR is to unify all EU member states' approach to data regulation to ensure all data protection laws are applied identically in every country within the EU. It further directs that all organisations must use individuals' data responsibly and gives the individual a voice as to what information is recorded and how it is shared.

2 Terms

The following are the terms used in this document, including referenced documents.

"Data" generally means information which are computerised or in a structured hard copy form.

"Personal Data" means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

"Sensitive Personal Data" relates to information concerning a **data** subject's racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences.

"Processing" means obtaining, recording or holding the data or carrying out any operations on the data such as organisation, retrieval, modification, dissemination or destruction.

"Data Controller" means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be processed.

The **"Data Processor"** is the entity (that can be natural or legal person, public authority, agency or other body) which processes personal data on behalf of the controller under the controller's instructions.

"Data Subject" means an individual who is the subject of personal data. In other words, the data subject is the individual whom particular personal data is about.

3 About Us

Kool Kidz Group is the data controller and responsible for your personal data (collectively referred to as 'we', 'us' or 'our' in document).

Kool Kidz Group contact details can be found on our website:

- <https://koolkidzgroup.co.uk/contact-us/>

Kool Kidz Group is also the data processor in certain situations, which are defined within this document.

We use third-party organisations as defined below:

- Online booking system;
- Online File sharing system;
- Website hosting company;

Please note: We do not disclose the name of the above companies for security reasons.

4 Key Questions our Privacy Policy Answers

Our Privacy Policy answers the following questions:

1. Why is personal data processed – this is answered in the sections:
 - a. *How We Use & Share your Data;*
 - b. *Offline Data Processing;*
2. Whose personal data is processed – this is answered in the sections:
 - a. *Information We Collect;*
 - b. *Children's Data;*
3. What personal data is processed – this is answered in the section *Information We Collect;*
4. When is personal data processed – this is answered in the section *Offline Data Processing;*
5. Where is personal data processed – this is answered in the sections:
 - a. *Information we Collect;*
 - b. *Offline Data Processing.*

5 Use of Our Website

You can visit and read information on our website without giving us any personally identifiable information.

In order to provide you with the most efficient and enhanced personalised service and attention and to accommodate certain requests which you make, we request information about you in certain circumstances and collect certain information automatically.

5.1 Passwords for The Website

There is currently no public login to our website and therefore no functionality that requires a password.

5.2 Information We Process

We only process details that you send us via our contact form:

- Your name;
- Your child/children's name;
- Child/children's date of birth;
- Your email address;
- Your phone number;
- The dates you require the children to be booked into the camps.

5.3 Personal Information

We do not collect any personal information from visitors who simply visit the Website.

5.4 Data We Store on Our Website

Data that you enter in the booking form on the website is saved on the website server and a copy of your request is emailed to us.

5.5 Technical Information

In addition to the information described above, we may collect other information as follows:

- Internet Protocol ("IP") addresses - which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device;
- Web browser type, version and language;
- Referring and exit (web) pages and URLs;
- Date and time;
- The pages of our Website that you visit;
- The time spent on those pages and other statistics;
- Information about your device, operating system and version, carrier and country location, hardware and processor information, network type, and similar data.

5.6 Cookies

Our website may use cookies in order to deliver a better experience for you. Cookies are files with small amounts of data that a website stores on your computer or mobile device's hard drive so that certain information about your visit and web-browsing preferences will be recognised upon a return visit. Cookies serve functions such as "remembering" log-in names (and sometimes passwords), or enabling or saving shopping basket contents.

Like many websites, we may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us improve the experience you have with our Website. Most web browsers have a function that allows you to delete existing cookies on your device or you can set your browser options so that your device does not receive or accept cookies. Doing this may interfere with your ability to use the Website.

5.7 Third-Party Analytics

We use third-party analytics services (such as Google Analytics) to evaluate and aggregate visitor data. These services help us evaluate visitors' use of the Website including time spent on certain pages, which areas of the Website receive the most traffic, how often visitors visit pages within the Website, provide general geographic location about visitors and the source of referred traffic (from other websites or via search engines, etc.). These third party analytic services use cookies and other technologies to help analyze and provide us with the data. By visiting and using the Website, you consent to the collection and review of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.

For more information on Google Analytics, including how to opt out from certain data collection, please visit <https://www.google.com/analytics>.

Please be aware that If you opt out of any service, you may not enjoy the full functionality of the Website.

6 Accessing Your Personal Information & Communication Preferences

To manage your receipt of marketing and non-transactional communications, you may unsubscribe by clicking the "unsubscribe" link located on the bottom of any related email from the Company.

7 How We Use & Share your data

We use the collected information to evaluate and administer our Website, fulfil your requests, respond to any problems that may arise, such as difficulties in navigating our Website or accessing certain features, and to gauge user trends.

We may also access or utilise information collected to provide our services, process orders, administer our programs, maintain and improve our Website and services to you, solicit your feedback, and to inform you about our products and services and those of our third-party marketing partners.

Under certain circumstances we may be obligated or compelled to disclose the Information:

- When required by law, court order, or other government or law enforcement authority or regulatory agency;
- Whenever we believe that disclosing such Information is necessary or advisable to protect the rights, property or safety of the Company or others.

Please see the section [Offline/How We use Your Data](#) for examples of how your data may be used by us in various cases.

8 Security of Your Information

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we incorporate standard industry practices internally and with our services providers, which we believe suits the degree of sensitivity of the information involved, we cannot guarantee its absolute security. Because we work with third-party businesses and vendors in various aspects of our business including operating this website, database management, website security, etc., we cannot guarantee the absolute security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to and from us over the Internet. In particular, e-mail sent to or from the Website may not be secure, and you should therefore take special care in deciding what information you send to us via email.

Please also see our [Data Protection Policy](#).

9 Children's Data

We are strongly committed to protecting the safety and privacy of children who visit our website. We do not knowingly collect Personal Information **from** children under the age of 13 through the Website.

If you are under 13, please do not give us any Personal Information.

We encourage all parents to talk to their children about online safety and to monitor their children's use of the Internet. If you have reason to believe that a child under the age of 13 has provided Personal Information to us, please contact us, and we will make best efforts to delete that information from our databases.

Because our business is based on hosting holiday camps for children, we do need to know the basic information about them – their names, date of birth and gender.

10 External Websites

We do not control and are not responsible for the privacy practices or content of third-party websites, including those of affiliates, business partners, sponsors, advertisers, or other websites to which we may link from time to time. When visiting any third-party websites, you are responsible for reviewing the Privacy Policy and terms of use applicable to each site. They may be different than those that you see here.

11 Offline Data Processing

Offline data processing is defined as processing that we undertake excluding our website and includes:

Contact and personal information:

- Parent's name, address, phone number, email address.
- Children's name, date of birth and gender;

Sensitive data:

- Any medical conditions or history;
- Allergy information;
- Medicine that is being taken;

Order information:

- Camp booking orders that you purchase from us.

Note that we do not administer any medication that has not been provided to us by the child's parent without written consent.

As part of our standard operations in running our business, the table below defines how and why we plan to use your personal data.

Purpose/Activity	Type of data	Lawful basis for processing
We complete a booking form to <i>register</i> you as a customer	(a) Contact (b) order information	Performance of a contract with you
We issue you with a confirmation of order/invoice	(a) Contact (b) order information (c) order details (d) financial information	(a) Performance of a contract with you (b) Necessary for our legitimate interests to receive payment for services ahead of event
Record health information	(a) Contact	Required as part of child protection and safeguarding

12 Changes to This Privacy Policy

The Company may update this Privacy Policy from time to time as necessary to protect our users and to comply with a changing environment. We recommend that you check the Privacy Policy when you visit our Website to be sure that you are aware of and understand our current policy. We have no intentions of making any changes to our Privacy Policy and practices to make them less protective of personal information collected in the past. By accessing the Website and/or using our services after making any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the information is governed by the Privacy Policy in effect at the time we collect the information. You are advised to review this Privacy Policy periodically for any changes.

13 Contact Us

If you have any questions about this Privacy Policy, please contact us via email at info@koolkidzgroup.co.uk with "Privacy Policy" in the subject line.

14 Version History

01 – Privacy Policy 20180518 – initial document approved by [Customer].