



*Enriching children's lives through practical learning and outdoor activities*

## **Privacy policy**

GENERAL PRIVACY POLICY FLOURISH @ THE FARM is a Ltd Company

### **FLOURISH @ THE FARM PRIVACY NOTICE FOR PARTICIPANTS.**

What is this notice? We are required by data protection law to look after and protect information that we hold about you. This privacy notice sets out the basis on which any personal data we collect from you, or that you give to us, is used by FLOURISH @ THE FARM What is personal information? Personal information is any information which is about you and is capable of identifying you. Examples of this would be your name, any medical information we need to know about and which of our programs you joined. Please make sure you read this privacy notice carefully and if you have any questions about it, please speak to your activity leader.

### **WHAT PERSONAL INFORMATION MIGHT FLOURISH @ THE FARM HOLD ABOUT YOU WITH YOUR CONSENT?**

- Childs full name
- Childs gender
- Childs date of birth
- Family home address and home telephone number
- Childs relevant medical records (including special education needs, allergies and/or accidents)
- Parents or guardians' contact details
- Any records we need to hold about you for safeguarding or child protection purposes

### **INFORMATION WE RECEIVE FROM OTHER PEOPLE OR COMPANIES**

We might work closely with other businesses, institutions or people such as nurses or doctors, photographers, social services, business partners or our accountants and lawyers. We might receive information about you from them. However, all information FLOURISH @ THE FARM receive will be fully confidential.

FLOURISH @ THE FARM hold holiday camps for children and is managed by the FLOURISH @ THE FARM.

### **CONTACT US IF YOU HAVE FURTHER QUESTIONS**

If you have any questions about this privacy notice, then please speak to your activity leader or contact [ben@flourishatthefarm.co.uk](mailto:ben@flourishatthefarm.co.uk). We will make sure that your question or query is handled by the right person. We take data protection very seriously and all staff will adhere to our confidentiality responsibilities.

### **HOW WE USE YOUR INFORMATION**

FLOURISH @ THE FARM is interested in doing the following things with your information (these are called "legitimate interests"):

- looking after your children, teaching your children, keeping a record of you and promoting the objects and interest of FLOURISH @ THE FARM; and
- managing any queries or disputes you may have with us or that we have with you. We will also use the information you give us as is necessary to carry out our obligations arising from the contract between us.

### **SENSITIVE PERSONAL DATA**

When we hold details about your medical condition or health, this type of information is called "sensitive personal data" which means FLOURISH @ THE FARM must adopt higher standards of care to make sure this kind of data is safe and doesn't fall into the wrong hands. We will need to hold sensitive personal data about your child (a) for carrying out our obligations in the field of social security or social protection law, (b) for identifying medical problems or provision of health care or (c) to protect your vital interests.

### **INFORMATION WE GIVE TO OTHER PEOPLE OR COMPANIES**

Your information will be protected and only viewed by relevant Flourish staff members.

In order to pursue one of the legitimate interests set out above, we may share your personal information with: members of the "Active Learning Group", local authorities, SEN co-ordinators, social services or the police where we have reason to believe there are concerns with safety.

If you are not British, we may have to provide information about you to UK Visas and Immigration. We may also need to share your information with our business partners, professional advisors and suppliers.

## **WHERE WE NEED YOUR CONSENT**

We will seek parent/ legal guardians' permission if we decide to post any photographs of you on any of our marketing materials (including our prospectus or website). Where you have given permission, you can withdraw this permission at any time.

You do not have to give us details about your race, religion or ethnicity if you do not want to. If you do provide us with this information, we only intend to use these details to assist us with the day-to-day running of the activity camp (for example, if your religion means that you have particular dietary requirements then we will be much better informed if we have this information to cater to your needs) and equal opportunities monitoring purposes. Where you have given this information to the activity camp, you can ask us to withdraw this information at any time.

## **YOUR RIGHTS**

Under data protection law, you have the following the rights: Request access to your personal information (commonly known as a "subject access request" or "SAR"). This enables you to receive a copy of the personal information we hold about you/your child and to check that we are lawfully processing it. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you/your child corrected. Request erasure of you/your child's personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. Object to processing of you/your child's personal information. This enables you to ask us to stop using your personal information. This enables you to ask us to suspend the processing of personal information about you/your child, for example if you want us to establish its accuracy or the reason for processing it. Request the transfer of your personal information to another organisation (e.g. another activity camp).

Right to object to marketing. If you do not want us to process your personal data for direct marketing, please tell us and we will ensure that we no longer do this. Right to complain to the ICO. Whilst we would always prefer it if you approach us first about any complaints or queries you may have, you always have the right to lodge a complaint with the Information Commissioner's Office.

## **HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

We will not keep any personal information about you for any longer than is necessary for the purposes for which the personal data are used.

## **CHANGES TO THIS PRIVACY NOTICE**

We might decide to make changes to this privacy notice and we will let you know about those changes when they are made.

Dated 15th February 2020 FLOURISH @ THE FARM NOTICE FOR PARENTS/GUARDIANS ONLY

## **1 INTRODUCTION**

1.1 We are committed to protecting and respecting your and your child's privacy. FLOURISH @ THE FARM run children's camps at THE FARM Stratford upon-Avon. 1.2 This privacy notice sets out the basis on which any personal data we collect from you or your child, or that you provide to us, is handled by us. 1.3 Please read the following carefully to understand our views and practices regarding your and your child's personal data and how we will treat it. 1.4 For the purposes of the General Data Protection Regulation 2016/679 ("GDPR"), FLOURISH @ THE FARM is based at 'THE FARM'

Stratford upon-Avon and its address is: THE FARM, Kings Lane, Snitterfield, Stratford upon Avon, CV34 0ja 1.5 If you are reading this privacy notice online, we recommend that you print and retain a copy for future reference.

## **2 INFORMATION WE COLLECT ABOUT YOU AND YOUR CHILD**

Information you give us 2.1 You may give us personal data about you or your child, in a number of ways; these include: 2.1.1 using, visiting or interacting with our website (such as filling out forms or registering on our website); 2.1.2 visiting one of our camps; 2.1.3 corresponding with us by phone, e-mail or post; and 2.1.4 sending information directly to us, for example when paying our fees, giving us medical records or information about your child's health, camp registration forms, signing our terms and conditions or providing information as requested by us and/or which is necessary from time to time. 2.2 The information you give us may include the following information about you and / or your child: 2.2.1 full name; 2.2.2 gender; 2.2.3 date of birth; 2.2.4 contact details (including home address, e-mail address, and mobile, home and/or work phone number); 2.2.5 parent login information (i.e. username and password) for the website; 2.2.6 financial and credit card information; 2.2.7 education and health records (including special education needs, medical or physical conditions and/or accidents); 2.2.8 current registered doctor's surgery; 2.2.9 family circumstances (including your relation to the child); and 2.2.10 which camp your child visited. Technical information we collect about you when you visit our website

2.3 With regard to each of your visits to our website we may automatically collect the following information: 2.3.1 technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and 2.3.2 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), and methods used to browse away from the page and any phone number used to call our number. 2.4 Our website may contain links to and from the websites of our partner networks, advertisers, suppliers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. Information we receive from other sources 2.5 We may be working closely with third parties (including, for example, your child's current school, medical practitioners, photographers, local authorities, education authorities, business partners, collectors, lawyers) and may receive information about you from them. 2.6 We may receive information about you if you use any of the other websites we operate or the other services we provide.

### **3 COOKIES**

3.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy which is made available on our website.

### **4 CONTACT US**

4.1 Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to [ben@flourishatthefarm.co.uk](mailto:ben@flourishatthefarm.co.uk) or visit us at THE FARM Stratford upon Avon.

### **5 USES MADE OF THE INFORMATION**

Information you give to us. 5.1 We will use the information you give to us to pursue the following legitimate interests: 5.1.1 to provide camps for your child; 5.1.2 to protect the welfare of your child 5.1.3 to store this information on our chosen management information system; 5.1.4 to manage any queries or disputes you or your child may have with us or that we have with you or your child; 5.1.5 to enforce our terms of use with you or any other contract we may have with you; 5.1.6 where your child is attending or has attended one of our camps, to provide you with information about other similar services (for example, one day activity camps) that we offer as part of extracurricular experiences and overall development of your child; and 5.1.7 to send out surveys to you by email in order for you to provide feedback to us on our residential summer camps. 5.2 In order to pursue the legitimate interests referred to in paragraph 5.1 we rely on software applications and other technology to process personal data about you and your children. This includes our management information system. The third parties we use to deliver these applications are carefully chosen and vetted by us to ensure that, among other things, your and your child's personal data is kept secure. 5.3 We will also use the information you give to us as is necessary to carry out our obligations arising from the contract (or potential contract) between you and us and to provide you with the information and services that you request from us. For example, we

will provide camps for your child and will use personal data where necessary to deliver this service. We will also use your personal information to invoice you for our services pursuant to the contract between you and us. We will also require a certain amount of personal information about you and your child at the registration stage. 5.4 Inevitably, there will be an overlap between what we do that is necessary to (a) perform our contract with you and (b) pursue a legitimate interest although we have tried our best to demarcate these as set out above. If you have any questions about these please contact our Data Protection Co-Ordinator (see paragraph 4). Information we collect about you from our website 5.5 We will use this information for the following legitimate interests: 5.5.1 to contact you if you have made an enquiry to us directly or via our online enquiry form and/or to inform you about available places at the camp in the future; 5.5.2 to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; 5.5.3 to improve our website to ensure that content is presented in the most effective manner, and your online experience is as effective and appropriate as possible, for you and for your

computer; and 5.5.4 as part of our efforts to keep our website safe and secure. Information we receive from other sources 5.6 We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out above (depending on the types of information we receive). 5.7 Also, health practitioners may provide us with information (particularly sensitive personal data) about your child which may need to be added to our medical, special educational needs or child protection file. This kind of processing of sensitive personal data may be necessary (a) for medical diagnosis or provision of health care and/or (b) to protect the vital interests of your child or another

person taking into account the mental and physical capacity of your child. 5.8 In order to achieve the purposes described in paragraph 5.7, we may do the following: 5.8.1 keep a list of your child's allergies or medical requirements within the camp premises in case of emergency. It is necessary for the camp to have a list readily available to our staff so that we are able to look after your child promptly in the event of a medical emergency; and 5.8.2 rely on software applications and other technology to process medical information (such as allergies, accidents and injuries) about you and your children. For further information on the kind of technology we use, particularly in the context of processing sensitive personal data about your child, please contact our Data Protection Co-Ordinator (see paragraph 4). When we disclose information 5.9 In order to pursue one of the legitimate interests set out above, we may share your and your child's personal information with: 5.9.1 local authorities, SEN co-ordinators, social services or the police where we have reason to believe there are safeguarding concerns in respect of your child; 5.9.2 where your child is not British, we may have to provide information about you or your child to UK Visas and Immigration; 5.9.3 business partners, professional advisors, debt collectors, suppliers and sub-contractors for the performance of any contract we enter into with them or you; and 5.9.4 credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you. 5.10 We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we need to get your consent 5.11 We will not market services to you (other than in accordance with paragraph 5.1.6 above) without your consent and you have the right to ask us not to use your contact details for marketing. 5.12 We will also seek your permission if we decide to post any photographs of your child on any of our marketing materials (including our prospectus, advertisements or website). 5.13 You or your child do not have to give us details about your child's race, religion or ethnicity if you do not want to. If you do provide us with this information, we only use these details to assist us with the day-to-day running of the residential summer camp (for example, if your child's religion means that he or she has particular dietary requirements then we will of course be much better informed if we have this information to cater to your child's requirements) and for equal opportunities monitoring purposes. Where you have given consent to the above, you can withdraw this consent at any time.

## **6 TRANSMISSION OF PERSONAL INFORMATION OUTSIDE THE EEA**

6.1 The data that we process about you and your child may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). We try to limit this where possible but it may be necessary where, for example, one of our suppliers has a data centre outside the EEA. We will take all steps reasonably necessary to ensure that your and your child's data is treated securely

and in accordance with this privacy notice and that the appropriate legal safeguards are in place prior to the transfer, for example particular ensuring that any contracts between us and the recipient of the information have EU-approved standard data protection clauses, or are recognised as having adequate protection for the transfer of personal data.

## **7 YOUR RIGHTS**

7.1 Under the GDPR, you and your child have the following rights: 7.1.1 Right to correction. You have the right to have inaccurate personal data about you or your child rectified.

7.1.2 The right to erasure. You have the right to request that we delete your and your child's personal data where: (a) the personal data are no longer necessary in relation to the purposes for which they were collected or processed; (b) you withdraw your consent to processing for which we previously obtained your consent; (c) you object to the processing and, as a result, we agree to cease that processing (please see paragraph 7.1.5 for more details); (d) the personal data has been unlawfully processed; and (e) we are required to erase the personal data in order to comply with the law. 7.1.3 Right to restriction. You have the right to obtain from us the restriction of processing where: (a) you contest the accuracy of the personal data we hold about you; (b) the personal data has been unlawfully processed; (c) we no longer need the personal data but they are required in limited circumstances; and (d) you object to the processing and, as a result, we agree to cease that processing (please see paragraph 7.1.5 for more details). 7.1.4 Right to request transfer. In certain circumstances, you have the right to receive personal data from us in a structured, commonly used and machine-readable format and the right to transmit it to a thirdparty organisation. 7.1.5 Right to object. You have the right to raise an objection to any of our processing in paragraphs 5.1 and 5.2. Please tell us if you object to any type of processing that we do, and we will work with you to address any concerns you may have. 7.1.6 Right to object to marketing. If you do not want us to process your personal data for direct marketing, please tell us and we will ensure that we no longer do this. 7.1.7 Right to complain to the ICO. Whilst we would always prefer it if you approached us first about any complaints or queries you may have, you always have the right to lodge a complaint with the Information Commissioner's Office. 7.1.8 Right to request access. You have the right to access personal data we hold about you. We encourage you to contact our Data Protection Co-Ordinator and request our standard SAR form for you to complete in order to help us process your request.

## **8 HOW LONG WE KEEP PERSONAL INFORMATION**

8.1 We will not keep any personal data about you for any longer than is necessary for the purposes for which the personal data are processed. 8.2 We follow a personal data retention policy which determines how long we keep specific types of personal information for. For further information about the criteria we use to determine what periods we keep specific information, please contact our Data Protection CoOrdinator (see paragraph 4). By way of summary, once a child in our records reaches the age of 15, we will delete their records soon afterwards (unless we think there is a good reason to keep them longer).

## **9 USE OF OUR WEBSITE**

9.1 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you

not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### **10 CHANGES TO OUR PRIVACY NOTICE**

10.1 Any changes we make to this privacy notice in the future will be posted on our website and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy notice.

Dated 15th February 2020