

## **Privacy and cookies**

### **Privacy Notice**

#### **Introduction**

When you use Sleep Matters' services, you trust us with your personal data. We are committed to keeping that trust, which starts with sharing our privacy practices. This Privacy Notice explains in detail what personal data we collect and how we use that information.

This Notice applies to any user of Sleep Matters' services, websites and social media anywhere in the world. Sleep Matters' services include child care, consulting, educational advising and tuition assistance.

This Notice is not intended to apply to any user whose personal data we are processing as a job applicant, apprentice, agency worker, employee and supplier.

Effective Date of Privacy Notice: 25 May 2018

#### **Who controls your personal data?**

Sleep Matters at 23 Hillhouse Wynd, Kirknewton, EH27 8BU, UK is the data controller.

For any questions, please contact us by email

at [babymattersbooking@gmail.com](mailto:babymattersbooking@gmail.com) or by post at the address listed above.

For simplicity throughout this Notice, 'we' and 'us' means Sleep Matters.

#### **What legal basis do we rely on to process your personal data?**

The privacy law in the European Union requires us to have a legal basis for processing your personal data. Below is a list of the legal basis we rely on:

**Consent:** We rely on your consent to process your personal data in very limited circumstances such as when you provide personal data to receive publications (e.g. newsletters, brochures, research studies), information on events or webinars and news about our company and services. After you sign up to receive communications you have the right to opt out at any time.

**Performance under a Contract:** Most of your personal data we process is necessary to perform our obligations under a contract we have with you. We can only provide the service to you or your dependants, if you provide us with the personal data necessary to perform the contract.

**Legal Obligations:** Across all of the services we provide, there are many laws that require us to process your personal data. We can only provide the service to you or your dependants, if you provide us with the personal data required under law. Examples include child care regulations, safeguarding/health/safety regulations.

**Legitimate Interests:** In some situations, we process your personal data to pursue our legitimate interests as a business. We will only process your

personal data if our legitimate interests do not materially impact your interests, fundamental rights, or freedoms. Examples include:

If you are a prospective, current or former customer, using your contact details to follow-up either by email, post, telephone or in-person to obtain your feedback on our service offering, reasons for choosing or not choosing our services and your experiences with our company.

If you are a prospective, current or former customer, using your email address to send you our newsletters, invitations to our webinars, informational publications, and new/enhanced service updates. You have the right to opt out of receiving these communications at any time.

Using your purchase, utilisation and enquiry history to make personalised offers for our services available to you.

Combining the demographic information of our customers such as post codes, number of children and children's ages to identify service trends.

Combining the care and service information of our customers to identify trends, learning opportunities and training needs within the company, as well as, to calculate statistics and support improving our service or developing new services.

Tracking your website interactions to determine the effectiveness of our websites, promotional campaigns and advertising.

### **When do we collect your personal data?**

How you interact with us, determines when we collect your personal data.

When you use our websites and social media:

Visiting any of our websites or engaging with us on social media.

Contacting us for information or customer service.

Creating an account and updating your account information.

Making a booking for our services.

Making a payment for our services.

When you contact or receive services directly:

Contacting us for information or customer service on the telephone, email or in person.

Booking a visit or appointment for one of our services.

While receiving services, completing electronic and paper forms, assessments and other documentation.

### **What personal data do we collect and process?**

The main reason we collect and process your personal data is to provide, evaluate and improve our services and your experiences with us.

Information you provide voluntarily (by telephone, online or in-person):

If you are a prospective customer, your contact details and other information necessary to fulfill your request for information.

If you are a customer, when booking our services or during the course of receiving our services:

Types of personal data may include your: personal and work contact details, dependant's details such as name, date of birth, gender, allergies, food restrictions, special needs, health information, and emergency contact details for doctors and alternative carers; and payment details.

Information we create/process when you use our services:

Details of your visits to our website and social media, as well as information gathered by the use of cookies in your web browser (\* see information below to learn more about how we use cookies).

For all our services, we create records during the course of providing services to you or your dependants such as notes from meetings/calls. Records created during child care include notes or the completion of forms recording activities and behaviours such as illness, sleep, nappy changes, meals, medication, learning, interactions with others, and accidents.

Utilisation information, such as dates of service, type of service, user of service and reasons for service.

Payment information.

Social media username and public comments/feedback on social media so that we can respond to comments, questions or feedback. These online and social media sites typically have their own privacy policies explaining how they use and share your personal data. You should carefully review those privacy policies before using these sites to make sure that you are happy with how they collect and share your personal data.

### **Why do we collect personal data?**

We limit the collection of personal data to what is necessary to provide you with high-quality services, to support your requests, and to meet our business needs in connection with the services. We do not sell your personal data to any third parties. Below we have highlighted our reasons for collecting your personal data:

Respond adequately to your requests for services or information.

Provide services to individuals and families that include childcare and other dependant care, education (general, higher and accredited education), wellbeing and work/life support, and consulting.

Provide a safe, healthy, and environment for those to whom we provide services.

Provide resource material/information regarding our services and areas of interest to our customers, such as parenting, childcare, adult care, education, wellbeing, and work/life balance.

Aid in the administration of our services to our customers.

Administer first aid, emergency and other medical care, when necessary.

Comply with laws, and government regulations/standards.

Support with education, training, curriculum, communication, administration, and record-keeping.

Facilitate and process payments for the services.

Fulfil tax, reporting, and other financial requirements and obligations.

Prevent or detect unlawful acts.

### **Where do we process and store your personal data?**

Electronic Information: Your personal data is held on electronic storage data systems in the UK.

Hardcopy Information: The hardcopy of personal information we collect is held in the UK.

### **Who do we share your personal data with?**

We consider your personal data confidential and do not share it with others except as described in this Privacy Notice. There are limited circumstances that require us to disclose your personal data to others in order to deliver services, or to meet our legal obligations or legitimate business interests.

Examples include:

Subcontractors and Other Agents: We sometimes employ or contract with other companies and individuals to perform functions on our behalf, such as providing dependant care services and supporting our systems. Depending upon the type of service they are providing, we may share sensitive personal data only as appropriate and necessary for the performance of the service. These parties are under contractual obligations to use your personal data only as directed by us and as needed to perform these functions. All are under a legal duty to handle such data in accordance with Baby Matters' this Privacy Notice.

Meet Legal Requirements: We share personal data if required by law/regulations or as we reasonably determine to be necessary to protect our rights or the rights of others, to prevent harm to persons or property, to fight fraud, or to enforce our website terms of use.

### **How long do we keep your personal data?**

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected and as required under law. At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

### **What rights do you have over your personal data?**

You have the right to request:

Access to the personal data we hold about you, free of charge in most cases.

The correction of your personal data when incorrect, out of date or incomplete.

That we stop using your personal data for direct marketing (either through specific channels, or all channels).

That we stop any consent-based processing of your personal data after you withdraw that consent.

To ask for copies of your personal data, please make a Data Subject Access Request by email to [babymattersbooking@gmail.com](mailto:babymattersbooking@gmail.com) or by post to 23 Hillhouse Wynd, Kirknewton, EH27 8BU. To ask for your information to be amended, please contact us at the above email or postal address.

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data. You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request. There are several ways you can stop direct marketing communications from us:

Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from that particular mailing list.

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated. To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites.)

### **How do we protect your personal data?**

We utilise appropriate technical, administrative and physical safeguards to protect your personal data we collect in both physical and electronic format. We provide training to our staff and conduct periodic quality assurance audits. However, no computer system or information can ever be fully protected against every possible hazard. As a result, Baby Matters cannot guarantee the security and privacy of the information you provide to us.

### **Will this Privacy Notice change?**

This Privacy Notice is subject to change and we will post revisions on our website. Please check back periodically, especially before you provide any personal information. This privacy policy was last updated in May 2018.

### **Questions?**

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact us:

Email us at [babymattersbooking@.com](mailto:babymattersbooking@.com)

Or write to us at 23 Hillhouse Wynd, Kirknewton, EH27 8BU, United Kingdom.

### **\* How we use cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.