

## Privacy Policy

At Junior Adventures Group UK, we are committed to protecting the privacy of the personal information we collect about any person. Junior Adventures Group UK contains operational entities Energy Kidz Ltd, Fit For Sport Ltd, and Sherpa Kids England Limited which provide outside school hours care services.

### Collection of personal information

We primarily collect personal information in order to safely and effectively provide our services, and to hire, train and manage our staff. The types of personal information we collect include:

- Name
- Child's Name
- Contact details
- Emergency contact information
- Identification details (e.g. drivers' licence, date of birth)
- Payment information
- Gender
- Occupation
- Government benefit information
- Background on family (including any court orders)
- Child and family preferences and interests
- Information to tailor care provided
- Records of attendance and use of our services
- Information about your dealings and interactions with us
- For job applicants, employment related information including background, qualifications, references, past employment, availability and screening check information (e.g. working with children, right to work)
- Sensitive types of personal information, for example:
  - Health information (e.g. to enable us to be properly prepared for any medical incidents)
  - Ethnic or cultural background (e.g. to ensure we are aware of any additional requirements during care)
  - Disability/additional needs (e.g. to ensure we are aware of any additional requirements during care)
  - Special dietary requirements (e.g. to ensure we are aware when providing food during care)
- Photographs and videos (only with consent)
- Criminal record (e.g. as part of employment screening)

We collect some personal information pursuant to laws including The Childcare Act (and related regulations), The Children Act, The Income Tax Act and other tax laws, Health and Safety Act and workers compensation acts.

We collect personal information from various sources including:

- Written and online applications
- Records of our dealings with you including via email, telephone, in person or online
- Video and audio surveillance of our workplaces
- Your representatives
- Public sources, including information published online
- Information service providers
- Schools and relevant authorities
- For staff and job applicants: referees, past employers, professional associations or registered bodies, law enforcement agencies, educational institutions, medical and competency test providers and performance feedback.

Where you provide us with personal information about someone else you must have their consent to provide their personal information to us based on this Privacy Policy.

### **How we hold and protect personal information**

We hold all personal information in electronic form and in hard copies. We take care to appropriately protect the security of personal information from unauthorised access, modification and disclosure as well as misuse, interference and loss. Depending on the circumstances, some of the data security measures we employ include passwords for electronic data, secure premises for hard copy data, and appropriate data access restrictions.

### **How we use and disclose personal information**

We may collect, hold, use and disclose your personal information for the following purposes:

- Providing, assessing and improving our services
- Individually tailoring our services and care
- Ensuring that our services are provided in a safe environment
- Recording attendance
- Processing and facilitating payments and rebates
- Engaging, training and managing our staff
- Verifying your identity and personal information
- Maintaining and updating our records
- Conducting marketing and market research activities including communicating with you about our programs, products and services (unless you opt out – contact us to do so)
- Managing queries, feedback, investigations and regulatory inquiries
- Facilitating corporate transactions involving the sale of any part of our business.
- For job applicants and staff, we may also collect, hold, use and disclose your personal information for the following purposes:
  - Your possible or actual employment and/or work placement
  - Checking your right to work status with any Government Agency or their agents
  - To undertake criminal reference checking with any Government Agency

- Any test or assessment that you may be required to undergo including medical assessments
- Identification of your training needs or any other products that may assist your development or employability
- Our management of performance reviews, complaints, investigations or inquiries that involve you
- Any insurance claim or workplace rehabilitation that requires disclosure of your personal and sensitive information

We may not be able to do the things above without your personal information, for example we may not be able to contact you, or for job applicants we may not be able to consider your application.

**The third parties to which we disclose personal information include:**

- Your referees
- Our service providers, including providers of customer contact, delivery, customer support and IT services
- Our related companies
- Our insurers
- HMRC
- Any person with lawful entitlement to obtain the information

**Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting the Junior Adventures Group Data Protection Officer.

**Our websites**

If you visit [www.energy-kidz.co.uk](http://www.energy-kidz.co.uk); [www.fitforsport.co.uk](http://www.fitforsport.co.uk); [www.sherpakids.co.uk](http://www.sherpakids.co.uk) (our Websites), our system may record information such as your server address, top level domain (e.g. .com, .uk, etc), date and time of your visit to the Website, pages accessed, information downloaded, previous site visited and browser type. This information is used for statistical, reporting and website administration and maintenance purposes.

Like many other websites, our Websites may use 'cookies' from time to time. A cookie is a

piece of information that allows our system to identify and interact more effectively with your browser. The cookie helps us to maintain the continuity of your browsing session and remember your details and preferences when you return. You can configure your web browser software to reject cookies however some parts of our Websites may not have full functionality in that case. See [www.allaboutcookies.org](http://www.allaboutcookies.org) for instructions on deleting and rejecting cookies for many common browsers.

Our Websites may use Google services such as Google Analytics from time to time. For more about how Google collects and processes data, please see Google's privacy policy and their information at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

## Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

### You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as

you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please submit a written request to the Junior Adventures Group Data Protection Officer.

### **No fee usually required**

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.

### **What we may need from you**

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.

### **Time limit to respond**

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.

### **Changes to our Privacy Policy**

If there are any changes to this Privacy Policy, we will replace this page with an updated version. It is therefore in your own interest to check the "Privacy Policy" page any time you access our web site so as to be aware of any changes which may occur from time to time.

