

## LITTLE CITY UK LIMITED – PRIVACY POLICY

### Our Contact Details

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**Little City UK Limited** (company registration number: 11677188) (“**we**”, “**us**”, “**our**”) have produced this privacy policy to provide you with information on how and why we collect, store, use and share your personal information.

It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the **General Data Protection Regulation (GDPR)**, and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

### **Terms used in this policy**

Personal information	Any information relating to an identified or identifiable individual.
Special category personal information	<p>Personal information revealing:</p> <ul style="list-style-type: none"><li>- racial or ethnic origin;</li><li>- religious beliefs;</li><li>- philosophical beliefs;</li><li>- genetic information; and</li><li>- health or sexual orientation.</li></ul> <p>We will only process special category information with your explicit <b>consent</b>, usually obtained through ticking a box to confirm your consent. <b>You may contact us to withdraw your consent at any time.</b></p>

**Personal information we collect about you/ your child**

<b>PERSONAL DATA TYPES</b>	<b>PERSONAL DATA WE COLLECT FROM YOU</b>
<b>Identity Data</b>	<ul style="list-style-type: none"> <li>● Your first name, last name, username or similar identifier.</li> <li>● The name of the child /children attending the play session.</li> <li>● Photographs taken of you / the children during the play session by Little City (with your consent).</li> </ul>
<b>Contact Data</b>	<ul style="list-style-type: none"> <li>● Billing address, home address, email address and telephone numbers.</li> <li>● If you message us via Facebook and Instagram, your account username details.</li> </ul>
<b>Transaction Data</b>	<ul style="list-style-type: none"> <li>● Where Party / Home Hire is booked directly through Little City – billing information, transaction, payment card information, name of the account holder, sort code and account number.</li> <li>● Where Little City sessions are booked through Bookwhen – sort code and account number details where we need to make a refund.</li> </ul>
<b>Marketing and Communications Data</b>	Your preferences in receiving marketing from us and your communication preferences.
<b>Profile Data</b>	Orders made by you, feedback and survey responses.
<b>Special Category:</b>	<p><b>Health Data:</b> Details of your health, specifically in relation to confirming whether you, or anyone in your household, is suffering from any symptoms of COVID-19 or are self-isolating for 14 days in response to experiencing COVID-19 symptoms.</p> <p>Any other information which you provide which falls into Special Category personal data (see page one for categories).</p>

## How and why we use your personal information

We will only use your personal data if we have a proper reason for doing so and this information is set out below.

<b>How we use your personal information:</b>	<b>Type of personal information used:</b>	<b>Reason why we use your personal information:</b>
<p>To process and deliver your order for our Little City services, including to:</p> <ul style="list-style-type: none"> <li>(a) process a play session booking (either online or in person);</li> <li>(b) coordinate a party/ group/ private hire booking;</li> <li>(c) process payments and any required refunds; and</li> <li>(d) contact you to inform you of any changes, cancellations, or queries with regards to a play event booking.</li> </ul>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Transaction</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary for our legitimate interests (to recover debts due to us)</li> </ul>
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>(a) notifying you about changes to our terms or privacy policy;</li> <li>(b) asking you to leave a review or take a survey; and</li> <li>(c) maintaining accurate customer records.</li> </ul>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary to comply with a legal obligation</li> <li>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services so we can improve our business)</li> </ul>

To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
Using photographs of you /your child in our printed and online publicity.	(a) Identity – (specifically through photographs) (b) Special Category data.	(a) Necessary for our legitimate interests (to advertise and grow our business) (b) Your specific consent (see separate related Consent Form)
In relation to health-related personal data, to ensure safe working practices and limit the spread of Covid-19 (Coronavirus).	(a) Identity (b) Special Category Health Data Under (c) Contact	(a) For our legitimate interests or those of a third party, eg to make sure we are following government guidelines and ensuring safe working practices for staff, customers and other third parties (b) Your specific explicit consent (provided at the time of booking by ticking a box on the booking form)

**When Little City will not provide a privacy notice to data subjects**

If you are booking a play session for multiple children, Little City requires the person booking to provide the name of each child attending the session. This is to provide Little City with a register of those at a play session for health and safety purposes. As we process each child’s name by recording and storing it on a register of attendees, Little City is obliged to notify each adult who holds parental responsibility for such a child of this processing. In situations where one adult books a play session on behalf of multiple children, Little City is under an obligation to provide a privacy notice to each parent detailing Little City’s processing of their child’s name. To provide this information, this would involve Little City requesting the contact details and then contacting the parent of each child booked to attend the session.

Given the personal data being processed is limited to a child’s name and the purpose of processing is limited to managing safety, Little City considers that providing a privacy notice

to each parent in the above situation would require a disproportionate effort from Little City. Relying on the 'disproportionate effort' legal exemption means that Little City is not obliged to provide such a Privacy Notice. Little City has carried out an assessment of the above approach to confirm it is a proportionate approach.

### **How we get the personal information and why we have it**

We may collect personal information:

- directly from you:
  - in person, by telephone, email or direct contact from you via Facebook or Instagram;
  - when you complete our online booking forms; and/or
  - when you visit our website: <https://www.littlecityuk.com/>.
- directly from a third party, for example:
  - **bookwhen.com** ('Bookwhen') – this is a separate online booking and reservation systems which collect your data when you book a LittleCity session using either of these platforms.
  - **Stripe** – when you book through Bookwhen, Stripe processes your payment details and we will access only the details necessary to provide you with a refund.

### **Sharing your personal information**

We will only **share** your personal information with:

- **The Panda Party Company** if, at the time you make a booking, you select 'Yes' to order party bags, and we will pass your name, telephone number and email address to The Panda Party Company. The Panda Party Company will then make contact with you to organise the sale of party bags.
- Little City has a number of franchises. In the unlikely event that a particular Little City service provider is unable to attend an event, a member of the franchise will provide cover for that event, and the booking information relevant to the play session will be shared with that member providing cover.

## **Marketing**

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

We rely on your express opt-in consent before we send you marketing emails. You will receive marketing emails from us only if you have ticked a box to confirm you would like to have your email address added to our email subscription list.

You have the right to have your email address removed from our mailing list at any time by:

- contacting us using the details set out at the top of this notice; or
- using the 'unsubscribe' link in emails.

We will never share your personal information with other organisations for marketing purposes.

### **Where your personal information is held**

Information Little City and its franchisees store information on personal laptops, personal mobile phones, and filing systems. Each device and filing system has appropriate security measures to prevent personal information from being accidentally lost, used or accessed unlawfully.

### **How long your personal information will be kept**

We will keep your personal information while we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to assist with the UK's 'track and trace' coronavirus strategy;
- to keep records required by law.

When it is no longer necessary to retain your personal information, we will delete or anonymise it. In most cases, all information gathered at booking stage will be deleted after 6 months of the booking.

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object:  —at any time to your personal information being processed for direct marketing (including profiling);  —in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- complete a data subject request form— for a template letter please access: <https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/preparing-and-submitting-your-subject-access-request/> ; or
- email, call or write to us using the details set out at the beginning of this notice and providing us with proof of your identity and details of the right you want to exercise.

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 could refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it could 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.

### **How to complain**

We hope that we can resolve any query or concern you may raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

### **Changes to this privacy policy**

This privacy notice was published on 30th June 2020.

### **Notice Format**

If you would like this notice in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).