



## **Privacy Policy**

The Fearless Frog Ltd

Last updated	17-02-21
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### Definitions

<b>Business</b>	means The Fearless Frog, a limited company.
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means Nicola Harriott.
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Business.

### **1. Data protection principles**

The Business is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## 2. General provisions

- a. This policy applies to all personal data processed by the Business.
- b. The Responsible Person shall take responsibility for the Business' ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Business shall register with the Information Commissioner's Office as an organisation that processes personal data.

## 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Business shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the Business shall be dealt with in a timely manner.

## 4. Lawful purposes

- a. All data processed by the Business must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).
- b. The Business shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Business' systems.

## 5. Data minimisation

- a. The Business shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

I may collect the following information:

- Parent/Carer/Customer name, address and contact information including email address and phone number
- Emergency contact details
- Child's name and date of birth
- Any allergy or relevant health information about the child
- Whether or not the customer provides consent for photographs

## 6. Accuracy

- a. The Business shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## 7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Business shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## 8. Security

- a. The Business shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## 9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Business shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

### **Links to other websites**

My website may contain links to other websites of interest. However, once you have used these links to leave my site, you should note that I do not have any control over that other website. Therefore, I cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Controlling your personal information**

If you have previously agreed to me using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at [thefearlessfrog ltd@gmail.com](mailto:thefearlessfrog ltd@gmail.com)

I use Happity to book and manage registrations.

I will not sell, distribute or lease your personal information to third parties unless I have your permission or are required by law to do so. I may use your personal information to send you promotional information about third parties which I think you may find interesting if you tell me that you wish this to happen.

You may request details of personal information which we hold about you under the Data Protection Act 1998. A small fee will be payable. If you would like a copy of the information held on you please e-mail [thefearlessfrog ltd@gmail.com](mailto:thefearlessfrog ltd@gmail.com). If you believe that any information I am holding on you is incorrect or incomplete, please write to or email me as soon as possible at the above address. I will promptly correct any information found to be incorrect.

### **How we use cookies - Google Sites website**

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 webpage 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.