

# Data Protection and Privacy Policy

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## Introduction

At Busy Bees Education and Training (BBET) we recognise that our excellent people with outstanding skills form the strong foundations needed to deliver an exceptional service and continue the success of the company. With this in mind, we are passionate about learning and development and give all our employees and learners the opportunities to develop the skills and confidence needed to reach their full potential and succeed.

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## **Busy Bees Education and Training Privacy Notice**

This Privacy Notice ("Privacy Notice") constitutes the Information Notice required under the Data Protection Act 2018 and the UK General Data Protection Regulation.

### **1. What is this document and why should you read it?**

- 1.1 Busy Bees respects your privacy and is committed to protecting your personal data.
- 1.2 This Privacy Notice explains how and why Busy Bees Holdings including each of its operating entities in the United Kingdom (also referred to as "Busy Bees", "we", "our" and "us") collects and processes your personal data when you browse our website or when you complete a web form expressing your interest in our services or when you complete the registration process to enrol onto any training.
- 1.3 You should read this Privacy Notice, so that you know what we are doing with your personal data. This Privacy Notice supplements other privacy notices and policies which we may make available to you from time to time and is not intended to override them.
- 1.4 This Privacy Notice does not form part of any contract you may have with us including contracts under which we provide childcare services to you.

### **2. What does this Privacy Notice contain?**

- 2.1 This Privacy Notice contains the following sections:
  - 2.1.1 What types of personal data do we process and where do we get it from?
  - 2.1.2 How do we use your personal data and what is the legal basis on which we process it?
  - 2.1.3 Who do we share your personal data with, and why?
  - 2.1.4 How do we protect and keep your personal data secure?
  - 2.1.5 How long do we keep your personal data for?
  - 2.1.6 What are your rights in relation to your personal data and how can you exercise them?
  - 2.1.7 Cookies.
  - 2.1.8 Definitions.
- 2.2 The pages which follow explain each of the above sections.

### **3. General Information**

- 3.1 If you want more information about any of the subjects in this Privacy Notice or if you would like to discuss any issues or concerns with us or if you wish to exercise any of your data protection rights as set out in this Privacy Notice, you can contact us by email addressed to [DPO@BusyBees.com](mailto:DPO@BusyBees.com) or by writing to The Data Protection Officer, Busy Bees Holdings Limited, St Matthews, Shaftsbury Drive, Burntwood, WS7 9QP, UK.
  - 3.2 This Privacy Notice is published by Busy Bees Holdings Limited, Registered in England and Wales under Company Registration No 06903391 with its registered office at St Matthews, Shaftsbury Drive, Burntwood, WS7 9QP, UK.
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#### 4. What types of your personal data do we collect and where do we get it from?

- 4.1 We collect many different types of personal data about you and, if we provide you with training services. We cannot respond to your enquiry or request for information or manage our relationship with you and to provide you with training services without your personal data. Where we don't need your personal data, we will make this clear, for instance we will explain if any data fields in our enquiry or application forms are optional and can be left blank.
- 4.2 Further details of the personal data we collect, where we get it from and what we do with it are set out in the table below.
- 4.3 If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting your Development Coach. Please always check first whether there are any available self-help tools to correct the personal data we process about you.

Type of personal data	Collected from
<b>Contact Information</b> <ul style="list-style-type: none"> <li>Name(s)</li> <li>Address(es)</li> <li>Email address(es)</li> <li>Contact details including mobile telephone number(s)</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Publicly available information from online resources including when you browse our website</li> <li>Your use of online application forms</li> </ul>
<b>b) Personal Information</b> <ul style="list-style-type: none"> <li>Date of birth</li> <li>Gender</li> <li>Next of kin and details of other dependants</li> <li>Your marital or relationship status</li> <li>Lifestyle and social circumstances</li> <li>Emergency contact information</li> <li>National Insurance number</li> <li>Voice recordings from voice messages or telephone calls</li> <li>Previous training records</li> </ul>	<ul style="list-style-type: none"> <li>You</li> </ul>
<b>c) Identity and Background Information</b> <ul style="list-style-type: none"> <li>Passport, drivers licence or such like forms of ID</li> <li>Verification of your address</li> <li>Birth certificate(s)</li> <li>Your medical and health reports and dietary requirements</li> <li>Image or photographs</li> <li>Application form(s)</li> <li>Credit check reports</li> </ul>	<ul style="list-style-type: none"> <li>You</li> </ul>
<b>d) Financial Information</b> <ul style="list-style-type: none"> <li>Bank account details</li> <li>Direct Debit</li> <li>Credit and/or debit card</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your bank or building society</li> <li>Your local authority and related agencies</li> </ul>
<b>e) Special Category Personal Data</b> <ul style="list-style-type: none"> <li>Racial or ethnic origin (including your nationality), religious or philosophical beliefs</li> <li>Your health data including allergy and vaccination status, accident reports, risk assessments, day-to-day health and safety concerns</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your emergency contact(s)</li> <li>External agencies</li> <li>Police, local or central government authorities</li> <li>Your GP or health centre</li> </ul>
<b>f) Security, Location and Access Information</b> <ul style="list-style-type: none"> <li>Information (including image data) captured or recorded by electronic card access systems, CCTV and other security control systems to the extent they are available</li> </ul>	<ul style="list-style-type: none"> <li>You</li> <li>Your use of Busy Bees Education and Training security control systems</li> <li>Records held at our centres</li> </ul>

## 5. How do we use your personal data and what is the legal basis on which we process it?

- 5.1 We process your personal data for particular purposes in connection with your engagement with us including when you browse our website, telephone us, complete a web form or when you register and complete training.
- 5.2 We are required by law to always have a permitted reason or justification (called a “lawful basis”) for processing your personal data. There are **six** such permitted lawful bases for processing personal data. The table below sets out a non-exhaustive list of the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing. These may change at any time and from time to time in response to changed legal, regulatory or operational requirements including, your requirements.
- 5.3 Please note that where we have indicated in the table below that our processing of your personal data is either:
- 5.3.1 necessary for us to comply with a legal obligation; or
  - 5.3.2 necessary for us to take steps, at your request, to potentially enter into a contract with you, or to perform it
- and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract with you.
- 5.4 We may also convert your personal data into statistical or aggregated form, to better protect you or your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports.
- 5.5 We may use some of your personal data for checking your credit worthiness using an external agency for this purpose. We will discuss any adverse findings with you rather than relying on an automated decision.

Processing Activity	Legal Basis for Processing
<p><b>Managing all aspects of our relationship with you</b> including, but not limited to, providing you with information about our services, considering your request to train, our fees and charges and your ability to pay, your bank account details, credit and or debit card information, carrying out credit checks, managing absence and sickness records, understanding health and dietary needs and special education needs, accidents and injuries, progress and development.</p>	<ul style="list-style-type: none"> <li>The processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or</li> <li>We have a legitimate interest in carrying out the processing for the purpose of managing and operating our business; or</li> <li>The processing is necessary for <b>compliance</b> with a legal obligation; or</li> <li>We have obtained your prior consent to the processing (this legal basis is only used in relation to processing that is entirely voluntary - it is not used for processing that is necessary or obligatory in any way).</li> </ul>
<p><b>Operating our business</b> including administering our business activities, operating, and managing our website and mobile Apps, providing content to you, displaying advertising and other information to you, communicating, and interacting with you through our website, mobile Apps or telephone and our services, and providing customer service, including handling enquiries and complaints.</p>	<p>The processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering with us; or</p> <ul style="list-style-type: none"> <li>We have a legitimate interest in carrying out the processing for the purpose of our website, mobile Apps, or our services to you.</li> <li>We have obtained your prior consent to the processing (this legal basis is only used in relation to processing that is entirely voluntary - it is not used for processing that is necessary or obligatory in any way).</li> </ul>

Processing Activity	Legal Basis for Processing
<p><b>Communications and marketing</b>, communicating with you through any means (including by email, telephone, SMS, social media, post or in person) about news, offers or services that we believe may be of interest to you, subject always to obtaining your prior opt-in consent to the extent required under applicable law, telling about changes to our services, providing you with information about our mobile Apps, providing you with information about other services we offer, maintaining and updating your contact information where appropriate, and obtaining your opt-in consent where required.</p>	<p>The processing is necessary in connection with taking steps to enter into any contract with us or to take steps prior to entering into a contract with us;</p> <ul style="list-style-type: none"> <li>• We have a legitimate interest in carrying out the processing for the purpose of contacting you, subject always to <b>compliance</b> with applicable law.</li> <li>• We have obtained your prior consent to the processing (this legal basis is only used in relation to processing that is entirely voluntary - it is not used for processing that is necessary or obligatory in any way).</li> </ul>
<p><b>Evaluation of registration forms</b> to assess and consider your request to place</p>	<ul style="list-style-type: none"> <li>• The processing is necessary in connection with taking steps to enter into any contract with us or to take steps prior to entering into a contract with us;</li> <li>• We have obtained your prior consent to the processing (this legal basis is only used in relation to processing that is entirely voluntary - it is not used for processing that is necessary or obligatory in any way) ; or</li> <li>• We have a legitimate interest in carrying out the processing for the purpose of managing our operations and resources.</li> </ul>
<p><b>Maintaining emergency contact</b> (which involve us holding information on those you nominate in this respect)</p>	<p>The processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or</p> <ul style="list-style-type: none"> <li>• We have a legitimate interest in carrying out the processing for the purpose of managing and operating our business; or</li> <li>• The processing is necessary to protect the vital interests of you.</li> </ul>
<p><b>Financial management</b> including, arising from registrations and enrolments, managing your account with us, finance, corporate audit, insurance, service provider and supplier management, the services we provide to you and billing.</p>	<ul style="list-style-type: none"> <li>• The processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us;</li> <li>• The processing is necessary for <b>compliance</b> with a legal obligation.</li> <li>• We have a legitimate interest in carrying out the processing for the purpose of managing and operating the financial affairs of our business; or</li> <li>• We have obtained your prior consent to the processing (this legal basis is only used in relation to processing that is entirely voluntary - it is not used for processing that is necessary or obligatory in any way).</li> </ul>
<p><b>Surveys</b> engaging with you for the purpose of obtaining your views on our services.</p>	<p>We have a legitimate interest in carrying out the processing for the purpose of conducting surveys, satisfaction reports and market research; or</p> <ul style="list-style-type: none"> <li>• We have obtained your prior consent to the processing (this legal basis is only used in relation to processing that is entirely voluntary - it is not used for processing that is necessary or obligatory in any way).</li> </ul>

Processing Activity	Legal Basis for Processing
<p><b>Management of IT systems</b> for the purpose of the management and operation of our communications, IT and security systems, and audits (including security audits) and the monitoring of such systems.</p>	<ul style="list-style-type: none"> <li>• The processing is necessary for <b>compliance</b> with a legal obligation; or</li> <li>• We have a legitimate interest in carrying out the processing for the purpose of managing and maintaining our communications and IT systems.</li> </ul>
<p><b>Compliance with applicable laws</b> relating to our training operations including legal and regulatory obligations applying to us and judicial or administrative orders regarding custody, access, safeguarding, education and special needs.</p>	<ul style="list-style-type: none"> <li>• The processing is necessary for <b>compliance</b> with a legal obligation.</li> </ul>
<p><b>To protect our safety and security and those of our staff, learners and visitors</b> including physical security of our premises, access to and records of visits to our premises, monitoring activity in our premises, CCTV recordings (to the extent that these are used and available) and electronic security (including login records and access details).</p>	<ul style="list-style-type: none"> <li>• The processing is necessary for <b>compliance</b> with a legal obligation; or</li> <li>• We have a legitimate interest in carrying out the processing for the purpose of ensuring safety and well being of individuals and the physical and electronic security of our business and premises.</li> </ul>
<p><b>Health and Safety</b> including health and safety assessments and record keeping including to prevent communicable health or medical conditions and viruses such as COVID-19, administration of first aid, administration of medicine (but only with your consent and direction), providing a safe environment at our premises and <b>compliance</b> with related legal obligations.</p>	<ul style="list-style-type: none"> <li>• The processing is necessary for <b>compliance</b> with a legal obligation; or</li> <li>• We have a legitimate interest in carrying out the processing for the purpose of ensuring safety at our nursery centre; or</li> <li>• The processing is necessary to protect the vital interests of any individual.</li> <li>• We have obtained your prior consent to the processing (this legal basis is only used in relation to processing that is entirely voluntary - it is not used for processing that is necessary or obligatory in any way).</li> </ul>
<p><b>Investigations</b> required for Safeguarding, detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.</p>	<ul style="list-style-type: none"> <li>• The processing is necessary for <b>compliance</b> with a legal obligation; or</li> <li>• We have a legitimate interest in carrying out the processing for the purpose of detecting and protecting against, breaches of our policies and applicable laws.</li> </ul>
<p><b>Legal proceedings</b> required for establishing, exercising and defending legal rights, including investigating and responding to claims against us and our staff.</p>	<ul style="list-style-type: none"> <li>• The processing is necessary for <b>compliance</b> with a legal obligation; or</li> <li>• We have a legitimate interest in carrying out the processing for the purpose of establishing, exercising or defending our legal rights and our staff.</li> </ul>
<p><b>Fraud prevention</b> required for detecting, preventing and investigating fraud.</p>	<ul style="list-style-type: none"> <li>• The processing is necessary for <b>compliance</b> with a legal obligation ; or</li> <li>• We have a legitimate interest in carrying out the processing for the purpose of detecting and protecting against fraud.</li> </ul>

## 6. Who do we share your personal data with, and why?

6.1 Sometimes we need to disclose your personal data to other people.

### **Inside the Busy Bees group**

6.2 We are part of the Busy Bees group of companies. Therefore, we will need to share your personal data with other companies in the Busy Bees group for our general business, for management purposes, for managing our nursery centres, incident and accident reporting, authorisations/approvals with relevant decision makers, parental reporting and where systems and services are provided on a shared basis.

6.3 Access rights between members of the Busy Bees group are limited and granted only on a need-to-know basis, depending on job functions and roles.

6.4 Where any Busy Bees group companies process your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them.

### **Outside the Busy Bees group**

6.5 We engage service providers or partners to manage or support certain aspects of our business operations on our behalf.

6.6 In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, in particular:

6.6.1 if we transfer, purchase, reorganise, merge or sell any part of our business or the business of a third party, and we disclose or transfer your personal data to the prospective seller, buyer or other third party involved in a business transfer, reorganisation or merger arrangement (and their advisors); and

6.6.2 if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our staff, and learners or other individuals.

6.7 We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

6.7.1 our bank;

6.7.2 consultants and professional advisors including legal advisors and accountants;

6.7.3 medical care and health providers;

6.7.4 background check providers;

6.7.5 courts, court-appointed persons, local authority designated officer (LADO) for Safeguarding purposes and local authority Special Educational Needs (SEN) officers;

6.7.6 business partners and joint ventures;

6.7.7 educational training providers;

6.7.8 insurers; and

6.7.9 governmental departments, statutory and regulatory bodies, Information Commissioner's Office (ICO), Disclosure and Barring Services (DBS), Ofsted, the police, social services and Her Majesty's Revenue and Customs.

We may also share your personal data with third parties, as directed by you.

6.8 If any of our processing activities require your personal data to be transferred outside the European Economic Area, we will only make that transfer if:



- 6.8.1 the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
- 6.8.2 we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
- 6.8.3 the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- 6.8.4 you explicitly consent to the transfer.

## **7. How do we protect and keep your personal data secure?**

We employ physical, electronic and managerial control procedures to safeguard and prevent unauthorised access, accidental loss, destruction or damage of your personal data. We choose these safeguards based on the sensitivity of the personal data that we collect, process and store and the current state of technology. Our outsourced service providers who support our operations are also vetted to ensure that they have appropriate technical and organisational measures in place to protect your personal data.

## **8. How long do we keep your personal data for?**

- 8.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.
- 8.2 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. Further the period of time that we will retain your personal data will also depend on a number of other factors, including:
  - 8.2.1 any laws, regulations, tax, accounting or reporting requirements that we are required to follow;
  - 8.2.2 whether we are in a legal or other type of dispute with each other or any third party;
  - 8.2.3 whether we are asked by you or a regulatory authority such as Ofsted to keep your personal data for a valid reason.
  - 8.2.4 Safeguarding information - 10 years
  - 8.2.5 Medical and health data - will not be destroyed
  - 8.2.6 Data and information relating to any learning undertaken will be as specified in learning agreements and as stated in statutory disposal of the data.

## **9. What are your rights in relation to your personal data and how can you exercise them?**

- 9.1 You have certain legal rights, which are briefly summarised in the table below, in relation to any personal data which we hold about you.



Your Right	What does it mean?	Limitations and Conditions on your Right
<b>Right of access</b>	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of others.
<b>Right to data portability</b>	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly used machine-readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.
<b>Rights in relation to inaccurate personal data or incomplete personal data</b>	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, email and telephone number.	Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.
<b>Right to object to or restrict our processing of your personal data</b>	Subject to certain conditions, you have the right to object to ask us to restrict the processing of your personal data.	This right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.
<b>Right to erasure</b>	Subject to certain conditions, you are entitled to have your personal data erased (also known as the "right to be forgotten"), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims including, for the purposes of debt recovery.
<b>Right to withdraw consent</b>	Where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.

- 9.2 Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on and in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point but you may, for example, lose future access to information about activities, promotions and offers.
- 9.3 Where our processing of your personal data is necessary for our legitimate interests, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.
- 9.4 If you wish to exercise any of your rights please contact [DPO@BusyBees.com](mailto:DPO@BusyBees.com).
- 9.5 You also have the right to lodge a complaint with the Information Commissioner's Office, which is the UK data protection regulator. More information can be found on the Information Commissioner's Office website at <https://ico.org.uk/>

## 10. Cookies

- 10.1 Similar to other commercial websites, our website uses technology called "cookies" and our web server logs and collects information about how our website is used.
- 10.2 Cookies in conjunction with our web server's log files allow us to calculate the aggregate number of people visiting our website and which parts of our website are most popular. This helps us gather feedback so that we can improve our website and better serve our customers.
- 10.3 You can find out more about cookies at <https://cookiepedia.co.uk/giving-consent-to-cookies>
- 10.4 You can manage your cookie preferences by clicking Cookie Settings. Some cookies are necessary or essential for our website to operate.

## 11. Definitions

- 11.1 "Personal data" is any information that relates to an identifiable natural person. Your name, address, contact details, banking details in direct debit forms are all examples of your personal data, if they identify you.
  - 11.2 The term "process" or "processing" means any activity relating to personal data, including, by way of example, collection, storage, use, organisation, consultation and disclosure by transmission.
  - 11.3 Busy Bees is a "controller" of your personal data. This is a legal term - it means that we make decisions about how and why we process your personal data, and, because of this, we are responsible for making sure it is used in accordance with data protection laws.
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## **Contact Us**

If you have any questions or suggestions regarding our privacy policy, please contact us:

DPO - European Data Protection Director  
Busy Bees Education and Training,  
Shaftsbury Drive,  
Burntwood  
WS7 9QP

Email: [dpo@busybees.com](mailto:dpo@busybees.com)

Sandy Silvester - Customer Service Director  
Busy Bees Education and Training,  
Shaftsbury Drive,  
Burntwood  
WS7 9QP

Email: [sandy.silvester@busybees.com](mailto:sandy.silvester@busybees.com)

## **Statutory information about Busy Bees Childcare**

Registered in England and Wales Registered Company No. : 4968957

Registered Office: Busy Bees, St.Matthews, Shaftsbury Drive, Burntwood, Staffordshire. WS7 9QP

## **Review**

This policy is reviewed annually, agreed and signed off by our CEO. During the year, if any legislative changes are published, then the policy would be updated earlier than the annual review date.

## **Training and Roll Out**

This policy will be made available via our website ([busybeestraining.co.uk](http://busybeestraining.co.uk)) and SharePoint. Training will be made available via our Virtual Learning Academy (VLA) and during Face-to-Face or Teams meetings as part of ongoing staff development, along with our commitment to this policy.

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