



Privacy Notice

As part of our ongoing commitment to you, CSS Activities' privacy policy details clearly outlining our responsibility regarding the handling of your personal data in line with the General Data Protection Act 2016 (GDPR). This will make it easier for you to understand what information we collect about you and how we protect and safeguard your personal data.

By registering your interest or signing up to our holiday provisions, either via our website at www.cssactivities.com, through our Google Forms booking system, email, Facebook, by phone or in person, you consent to the collection and use of your information under the terms of this policy.

Data Controller

Charlie Tarrant of CSS Activities Ltd is the Data Controller for all personal data that you submit and we are regulated by our membership with the Information Commissioner's Office. We encourage any individuals covered by this privacy notice to contact the Data Controller with any concerns about processing of your personal information.

What information we collect about you

Personal information:

This is data that can be used to identify or to contact you including:

- Parent/Guardian name

- Address
- Email address
- Phone Number
- Child's name, date of birth and gender
- Relevant medical conditions
- When offering refunds, we take bank details and delete these after use.

Information that you provide by filling out all forms on our website, our paper application forms or signing up for our newsletter via Squarespace. If you contact us by phone or email, we will keep a record of that correspondence and may ask you to complete email surveys for our research and customer satisfaction purposes.

Non-Personal Data:

This is information that cannot be used to identify or contact you including:

- Attendance
- First Aid incidents
- Behavioural incidents
- Preferred activities

Do we share your information with third parties?

No, we do not share any of your information with third parties unless in the following two extenuating circumstances:

- We are compelled and requested by legal authorities to provide information
- The business was sold to a new owner along with our hire contracts and customer details.

In order to help the smooth running of our business we use the following online companies to hold your information:

- Class4kids booking system
- Google (Gmail/Forms/Sheets/Docs/Drive)
- Squarespace

These companies have their own Privacy Notices that can be found on their websites.

What do we use data for?

We use it to contact you about bookings, inform you about provision details, company news and in case of cancellation. All correspondence will normally be by email except when otherwise requested. For urgent information, such as cancelling sessions, you will be informed by email and text. Data is also used for invoicing and tax purposes.

Social media

Our website includes social media features e.g. Facebook and Instagram. Your interactions through these features are governed by the privacy policy of the company providing the social media platforms, such as Facebook and Twitter.

Data Storage

The data we collect in connection with our services is stored via Google Drive. In the rare event that hard copies are made, these are stored in a locked secured cupboard in a locked office. You are entitled to see the information held about you and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact us either in writing or by email at hello@cssactivities.com. We are entitled by law to charge a fee of £10 to meet our costs in providing you with details of the information we hold about you.

Any changes to our privacy policy in the future will be updated to the website www.cssactivities.com. The CSS website is operated by CSS Activities Ltd itself.

Staff Privacy Notice

How do we collect information for staff?

We may collect personal data in a number of ways, for example:

- From the information provided to us before making a job application, for example when an interview is attended
- When formal application to work for us has been submitted, including personal data in application forms and covering letters
- From third parties, for example the Disclosure and Barring Service (DBS) and referees (including previous or current employers), in order to verify details about the potential employee

More generally, during the course of your employment with us, as a member of staff, we will collect data from or about you, including:

- When you provide or update your contact details;
- When you or another member of staff completes paperwork regarding your professional development;
- In the course of fulfilling your employment (or equivalent) duties more generally, including by filling reports, note taking, or sending emails;
- In various other ways as you interact with us during your time as a member of staff, and afterwards, where relevant, for the various purposes set out below.

The types of information we collect

We may collect the following types of personal data about you (and your family members and 'next of kin', where relevant):

- Contact and communications information, including: your contact details (including email address/es, telephone number/s and postal address/es).
- Contact details (through various means, as above) for your family members and 'next of kin', in which case you confirm that you have the right to pass this information to us for use by us in accordance with this Privacy Notice;
- Records of communications and interactions we have had with you;
- Biographical, educational and social information, including: your name, title, gender, nationality and date of birth;
- Your image and likeness, including as captured in photographs taken for work purposes;
- Details of your education and references from your institutions of study;
- Lifestyle information and social circumstances; your interests and extracurricular activities

Financial information, including: your bank account number(s), name(s) and sort code(s) (used for paying your salary and processing other payments);

- Your tax status (including residence status);
- Information related to pensions, national insurance, or employee benefit schemes;

Work related information, including:

- Details of your work history and references from your previous employer(s);
- Your personal data, notes and correspondence you create while employed by or otherwise engaged to work for CSS Activities;
- Any other information relevant to your employment or other engagement to work for CSS Activities

Where this is necessary for your employment or other engagement to work for us, we may also collect special categories of data, and information about criminal convictions and offences, including:

- Information revealing your racial or ethnic origin;
- Trade union membership, where applicable;
- Information concerning your health and medical conditions (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment);
- Information about certain criminal convictions (for example, where this is necessary for due diligence purposes, or compliance with our legal and regulatory obligations);

However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your employment or other engagement to work for CSS Activities.

(i) Entering into, or fulfilling, our contract with you

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, such as a contract of employment or other engagement with us. In this respect, we use your personal data for the following:

- Administering job applications and, where relevant, offering you a role with us;
- Carrying out due diligence checks on you, whether during the application process for a role with us or during your engagement with us, including by checking references in relation to your education and your employment history;
- Once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or other agreement) between you and us;
- To pay you and to administer benefits (including pensions) in connection with your employment or other engagement with us;

- Monitoring your attendance and your performance in your work, including in professional development discussions;
- Promoting CSS Activities to prospective parents and others;
- For disciplinary purposes, including conducting investigations where required;
- For other administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement, or changes to your pension arrangements;
- For internal record-keeping, including the management of any staff feedback or complaints and incident reporting; and for any other reason or purpose set out in your employment or other contract with us.

(ii) Legitimate Interests

We process your personal data because it is necessary for our (or sometimes a third party's) legitimate interests. Our "legitimate interests" include our interests in running CSS Activities in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law). In this respect, we use your personal data for the following:

- To safeguard children's welfare and provide appropriate pastoral care;
- To carry out or cooperate with any company/school or external complaints, disciplinary or investigatory process;
- In connection with organising events and social engagements for staff;
- Making travel arrangements on your behalf, where required;
- Contacting you or your family members and 'next of kin' for business continuity purposes, for example to confirm your absence from work;
- Publishing your image and likeness in connection with your employment or engagement with us;

(iii) Legal Obligations

We also process your personal data for our compliance with our legal obligations, notably those in connection with employment, charity law, tax law and accounting, and child welfare. In this respect, we use your personal data for the following:

- To meet our legal obligations (for example, relating to child welfare, social protection, diversity, equality, and gender pay gap monitoring, employment, and health and safety);
- For tax and accounting purposes, including transferring personal data to HM Revenue and Customs to ensure that you have paid appropriate amounts of tax, and in respect of any Gift Aid claims, where relevant;
- For the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

(iv) Special categories of data

We process special categories of personal data (such as data concerning health, religious beliefs, racial or ethnic origin, sexual orientation or union membership) or criminal convictions and allegations for the reasons set out below. We will process this data on the basis that such processing is necessary to carry out obligations and exercise rights (both yours and ours) in relation to your employment. In particular, we process the following types of special category personal data for the following reasons:

- Your physical or mental health or condition(s) in order to record sick leave and take decisions about your fitness for work, or (in emergencies) act on any medical needs you may have;
- Recording your racial or ethnic origin in order to monitor our compliance with equal opportunities legislation;
- Trade union membership, in connection with your rights as an employee and our obligations as an employer;
- Categories of your personal data which are relevant to investigating complaints made by you or others, for example concerning discrimination, bullying or harassment;

- Data about any criminal convictions or offences committed by you, for example when conducting criminal background checks with the DBS, or where it is necessary to record or report an allegation (including to police or other authorities, with or without reference to you);

We will process special categories of personal data for lawful reasons only, including because:

- You have given us your explicit consent to do so, in circumstances where consent is appropriate;
- It is necessary to protect your or another person's vital interests, for example, where you have a life threatening accident or illness in the workplace and we have to process your personal data in order to ensure you receive appropriate medical attention;
- It is necessary for some function in the substantial public interest, including the safeguarding of children or vulnerable people, or as part of a process designed to protect others from malpractice, incompetence or unfitness in a role (or to establish the truth of any such allegations); or
- It is necessary for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against us or you.

Sharing your information with others

For the purposes referred to in this privacy notice and relying on the basis for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:

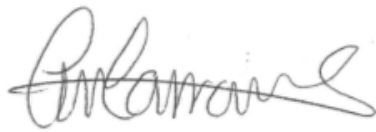
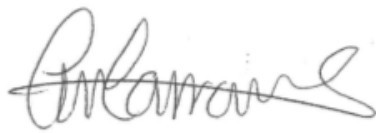
- Other employees, agents and contractors (eg third parties processing data on our behalf as part of providing services such as administering payroll services, the provision of benefits including pensions and IT services, amongst others) – although this is not sharing your data in a legal sense, as these are considered data processors on our behalf);
- DBS and other relevant authorities and agencies

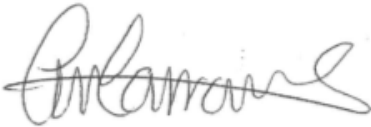
How long your information is kept

Personal data relating to unsuccessful job applicants is usually deleted after 1 year, except where we have notified you we intend to keep it for longer (and you have not objected). For employees, subject to any other notices that we may provide to you, we may retain your personal data for a minimum period of 7 years after your contract of employment (or equivalent agreement) has expired or been terminated. However, some information may be retained for longer than this, for example incident reports and safeguarding files, in accordance with specific legal requirements.

Contact and complaints

If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact the Privacy and Compliance Manager in the first instance. If you believe that CSS has not complied with this policy or acted otherwise than in accordance with Data Protection Law, you should refer to the company's Grievance Policy and Procedure and should also notify the Privacy and Compliance Manager.

Reviewed: November 2021	By:	Charlie Tarrant, Managing Director
Signed: 	By:	Charlie Tarrant Managing Director
Reviewed: November 2022	By:	Charlie Tarrant, Managing Director
Signed: 	By:	Charlie Tarrant Managing Director
Reviewed: November 2023	By:	Charlie Tarrant, Managing Director

Signed: 	By:	Charlie Tarrant Managing Director
Next Review Date:		November 2024
Reviewed: November 2024	By:	Charlie Tarrant, Managing Director
Signed: 	By:	Charlie Tarrant Managing Director
Next Review Date:		November 2025