



Acorns General Data Protection Regulation Policy

Policy Statement

At Acorns, we believe privacy is important. We are committed to complying with our data protection obligations and to being concise, clear and transparent about how we obtain and use personal information and how and when we delete that information once it is no longer required.

Statement of Intent

GDPR stands for General Data Protection Regulation and replaces the previous Data Protection Directives that were in place. It was approved by the EU Parliament in 2016 and came into effect on 25th May 2018. GDPR states that personal data should be 'processed fairly & lawfully' and 'collected for specified, explicit and legitimate purposes' and that individual's data is not processed without their knowledge and are only processed with their 'explicit' consent. GDPR covers personal data relating to individuals. Acorns is committed to protecting the rights and freedoms of individuals with respect to the processing of children's, parents, visitors and staff's personal data. The Data Protection Act gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly. Acorns is registered with the ICO (Information Commissioners Office).

Personal Information is held on at least one of the following bases:

- Consent
- Contractual
- Legal Obligation
- Vital Interests
- Public Interest
- Legitimate Interests

GDPR includes 7 rights for individuals:

1. The right to be informed: Acorns will keep individuals informed of its processing activities through its privacy notices.
2. The right of access: An individual may make a subject access request (“SAR”) at any time to find out more about the Personal Information which Acorns holds on them. All SARs must be forwarded to the manager. Acorns is required to respond to a SAR within one month of receipt, but this can be extended by up to two months in the case of complex and/or numerous requests and, in such cases, the individual will be informed of the need for such extension. Acorns does not charge a fee for the handling of a straightforward SAR.
3. The right to erasure: An individual is entitled to request that Acorns ceases to hold Personal Information it holds about them. Acorns is required to comply with a request for erasure unless we have reasonable grounds to refuse.
4. The right to restrict processing: An individual is entitled to request that Acorns stop processing the Personal Information it holds about them in certain circumstances.
5. The right to data portability: An individual has the right to receive a copy of their Personal Information and use it for other purposes.
6. The right to object: An individual is entitled to object to Acorns processing of their Personal Information.
7. The right not to be subject to automated decision-making including profiling: Automated decisions and profiling are used for marketing based organisations. Acorns does not use personal data for such purposes.

Personal information that is stored will include:

- Children’s and parent’s details such as name, address, date of birth, phone numbers, medical information, gender, email, ethnicity, special educational needs, emergency contact details, registers, attendance records, photographs (for wall displays), parental responsibility,

safeguarding information, observation & developmental records, immunisations and data we may have received from other agencies.

- Staff details such as name, address, date of birth, application form, medical information, bank details, criminal records, insurance numbers, training certificates and qualifications.
- Accident forms, incident records, restraint records, administration of medication records.
- Child protection records.

These records are shredded after the relevant retention period.

Information Commissioners Office:

The Data Protection Act 1998 requires every organisation that processes personal information to register with the Information Commissioner's Office (ICO), unless they are exempt. Failure to do so is a criminal offence. The role of the ICO is to uphold information rights in the public interest and to improve the information rights practices of organisations by gathering and dealing with concerns raised by members of the public. The ICO has set out a commitment to increase consumer trust that people have in what happens to their personal data. The Commissioner has also demonstrated a focus on the essential role data protection can play in innovation, and the importance of organisations understanding the growing push on companies to be accountable for what they do with personal data. This forms a central part of the new General Data Protection Regulation, which comes into force in May 2018.

Data Protection Officer:

A data protection officer (DPO) is a security leadership role required by the General Data Protection Regulation (GDPR). Data Protection Officers are responsible for overseeing data protection strategies and implementations to ensure compliance with GDPR requirements. When the GDPR becomes effective in May 2018 the data protection officer becomes a mandatory role under Article 37 for all companies that collect or process personal data in the EU. DPO's responsibilities include but are not limited to educating the company and its employees on the important compliance requirements and conducting regular security audits. They are also the point of contact between

the company and GDPR supervisory Authorities. The DPO will need to ensure they have informed parents, carers and staff on how their data is being stored and their rights to any of it being erased at any point. Acorns Designated Data Controller is Leahanne Baird (manager).

Complaints:

Complaints will be dealt with in line with Acorns complaints policy. You have the right to make a complaint at any time to the ICO, the supervisory authority for data protection issues.

Monitoring

This policy will be reviewed annually by the management team to ensure it remains fit for purpose.

Managers signature _____ Date _____

Owners signature _____ Date _____

Reviewed on:

Date _____ Signed _____

Date _____ Signed _____

Date _____ Signed _____