EDUART C.I.C. • HAPPY HOGLETS MULTILINGUAL NURSERY • UK GDPR & DATA PROTECTION

Privacy Notice – Children, Parents, Carers & Staff

Unit 1, Wolseley Trust Business Park, Plymouth, PL2 3BY • Last Updated: October 2026 • Review Date: October 2027

1. Data Controller Identity & Contact Details

At **Happy Hoglets Multilingual Nursery** (operated by **EDUART C.I.C.**), we treat the privacy and security of children, parents, carers, staff, and visitors as an integral part of our safeguarding duty. **EDUART C.I.C.** is the registered Data Controller responsible for personal data processed in connection with Happy Hoglets Nursery.

- **Data Controller:** EDUART C.I.C. (operating Happy Hoglets Multilingual Nursery)
- **Premises Address:** Unit 1, Wolseley Trust Business Park, Plymouth, PL2 3BY
- **Data Protection & Nursery Manager Lead:** Claudia Cristina Zolde (Nursery Manager & DSL)
- **Email & Website:** eduartcic@gmail.com | eduartcic.org

We process all personal data in strict compliance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, the **Data (Use and Access) Act 2025**, and the **EYFS Statutory Framework (effective 1 September 2026)**.

2. Categories of Personal Information We Collect

- **Children's Information:** Full name, date of birth, home address, birth certificate verification, parent/carer and emergency contact details, parental responsibility status, collection passwords, daily attendance logs, EYFS learning observations, Progress Check at Age Two records, home language and EAL profiles, photographs/videos (with consent), accident/incident/medication logs, and safeguarding records.
- **Special Category Data (Children):** Health and medical conditions, allergies and dietary intolerances, immunisation status, SEND records (IEPs, EHATs, EHCPs), ethnicity, religion, and safeguarding disclosures.
- **Parents & Carers:** Names, addresses, telephone numbers, email addresses, relationship to child, emergency contacts, funding eligibility codes (Plymouth City Council Early Years Funding), and fee/billing records.
- **Staff, Volunteers & Visitors:** Contact details, qualifications, employment history, right-to-work checks, Enhanced DBS certificate numbers and update service checks, Paediatric First Aid/safeguarding training records, and visitor sign-in logs.

3. Why We Use Personal Information & Lawful Bases

Purpose of Processing	UK GDPR Lawful Basis	Special Category Condition (Article 9)
Safeguarding children, recording injuries/concerns, and liaising with Plymouth Families First or police.	**Legal Obligation** (Art. 6(1)(c)) & **Vital Interests** (Art. 6(1)(d))	Substantial public interest – safeguarding of children and individuals at risk (Art. 9(2)(g) / DPA 2018 Sch. 1).
Meeting EYFS statutory duties (registers, ratios, medication logs, accident forms, age-2 progress checks).	**Legal Obligation** (Art. 6(1)(c))	Health or social care management / statutory regulatory compliance (Art. 9(2)(h) & (g)).
Delivering childcare places, managing bookings, invoicing, and communicating daily updates to parents.	**Contract** (Art. 6(1)(b))	Explicit parental consent or vital interests for allergy/dietary safety.
Tailoring multilingual EAL support, SEND graduated response, and off-site sessions at Wolseley Trust Garden/Hall.	**Public Task / Legitimate Interests** (Art. 6(1)(e)/(f))	Provision of health/social care and educational support (Art. 9(2)(h)).

Purpose of Processing	UK GDPR Lawful Basis	Special Category Condition (Article 9)
Publishing photographs/videos on nursery website, social media, or promotional materials.	**Explicit Consent** (Art. 6(1)(a)) — withdrawable at any time	Not applicable (no special category data published).

4. Children's Privacy & Multilingual Accessibility

In line with Information Commissioner's Office (ICO) guidance, we prioritise the best interests of the child in all data decisions. Because our children are aged 2–5 years, primary privacy notices are provided to parents/carers, while staff explain privacy, bodily autonomy, and safe boundaries to children in age-appropriate, multilingual ways. Where families speak Romanian or other home languages, key privacy and consent forms are explained clearly in their preferred language.

5. Who We Share Information With & International Transfers

We never sell personal data. Information is shared strictly on a necessary, proportionate basis with: parents/carers with parental responsibility; emergency medical services (999) and GPs; **Plymouth City Council** (Early Years Funding, SEND Team, Early Help, and Families First Children's Services); **Ofsted**; partner schools during transition; and vetted UK/GDPR-compliant IT, accounting, or nursery management software providers. Where any cloud software processes data outside the UK, EDUART C.I.C. ensures UK International Data Transfer Agreements (IDTAs) or adequacy safeguards are in place.

6. Data Security & Statutory Retention Periods

- **Security Measures:** Paper safeguarding, medical, and registration files are locked in secure cabinets at Unit 1, Wolseley Trust Business Park, accessible only to authorised leadership (**Claudia Cristina Zolde** and **Irina Ecaterina Matei**). Digital records are encrypted and password-protected.
- **Retention Schedules:** Attendance registers, medication logs, and accident records are retained in line with EYFS, Ofsted, and insurance limitation requirements (typically until the child reaches age 21–25 for accident/safeguarding records, and 6–7 years for financial/funding records), after which they are confidentially shredded or securely purged.

7. Your Data Protection Rights & Complaints

Under UK data protection law, you have the right to request access to your/your child's personal data (Subject Access Request), request rectification of inaccurate records, request erasure or restriction in certain circumstances, object to processing, and withdraw consent at any time. To exercise any right, email **eduartcic@gmail.com**. If you remain dissatisfied with our response, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)** at *ico.org.uk/make-a-complaint* or by calling **0303 123 1113**.

Approved By Data Controller (EDUART C.I.C. / Happy Hoglets Multilingual Nursery)

Director, Nursery Manager & DSL: Claudia Cristina Zolde	**Signature:** _____	**Date:** 01/10/2026