



**Severn Lodge Nursery
& Pre School**

Severn Road Bradford BD2 4LS
Tel: 01274 637425

www.severnlodgenursery.co.uk

Ofsted Reg No: 302062

Company Reg no: 4920491

Directors: Michael King and Marian Bentley

DATED

25TH May 2018

GDPR PRIVACY NOTICE

FOR EMPLOYEES,

**CHILDREN ATTENDING SEVERN LODGE PRIVATE DAY NURSERY AND
PRESCHOOL**

AND THEIR PARENTS



Privacy Statement

WHAT IS THE PURPOSE OF THIS DOCUMENT?

Severn Lodge Ltd are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

This notice applies to:

1. All Client's. Under this Notice, Client's will include all children who use our services and as appropriate their parents and/or guardians.
2. All Third Parties and Suppliers with whom we have dealings in the ordinary course of our business including those individuals with whom we send marketing information regarding

Any reference to 'we', 'us', 'our', 'the company' shall mean Severn Lodge Ltd.

Any reference to 'you' or 'Data Subject' shall mean any individual receiving this notice for whom we hold personal data.

This Privacy Statement does not include information relating to the retention of data on limited companies as such data is not incorporated within the provisions of GDPR.

This Privacy Notice also applies to our website <http://www.severnlodgenursery.co.uk/>

In many circumstances we hold your data as a "Data Controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. In some circumstances we may acquire or handle your data as a 'Data Processor' which means we have been asked to handle your data by a third party other than yourself and do not directly store your data.

We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.



DATA PROTECTION PRINCIPLES

We will comply with data protection laws including GDPR. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

THE KIND OF INFORMATION WE HOLD ABOUT CLIENTS

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you and your children:

For Parents

- Personal contact details such as name, title, addresses and personal email addresses.
- Telephone number(s) including extended family members.
- Date of birth.
- Gender.
- Marital status and dependants.
- National Insurance number / Asylum seeker number
- Bank account details
- Location of employment or workplace.
- Copy of driving licence or alternative form of identification.
- Proof of benefits (if applicable)
- Details of agencies / professionals working with parents
- Consent to medication administration
- Complaint records

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about a Parent's race or ethnicity, spoken language and nationality.



- Conversations with Parents where Employees of the Nursery deem it relevant to the prevention of radicalisation or other aspects of the governments Prevent strategy.

For Children

- Full name
- Siblings names
- Date of Birth
- Address
- Child's GP details
- Information regarding allergies and/or medication requirements
- Accident / Incident records
- Complaint records
 - Next of Kin details
 - Dietary requirements
 - Attendance information
 - Photographs and video clips of the Child to signpost Children to where their belongings are stored at the Nursery that they attend, and also for general display purposes
 - Emergency contact should Parents be unavailable and the emergency contact's contact details
 - Record book for each Child containing the work of the Child whilst at the Nursery, observations about the Child's development whilst at the Nursery from Employees of the Nursery, specific examples of the Child's progress, photographs demonstrating the Child's development whilst at the Nursery, and personal details of the Child (e.g. their date of birth) ("Progress Report")
 - Records relating to individual Children e.g. care plans, common assessment frameworks, speech and language referral forms
 - Accidents and pre-existing injuries forms
 - Records of any reportable death, injury, disease or dangerous occurrence
 - Observation, planning and assessment records of Children
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We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about a Child's race or ethnicity, spoken language and nationality, religious beliefs, sexual orientation and political opinions.
- Information about a Child's health, including any medical condition, health and sickness records.
- Information about a Child's accident or incident reports including reports of pre-existing injuries.
- Information about a Child's incident forms / child protection referral forms / child protection case details / reports.

Employees:

We will collect, store, and use the following categories of personal information about Employees:

- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses
- Date of birth
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date and, if different, the date of an Employee's continuous employment.
- Location of employment or workplace.
- Copy of driving licence (where applicable).
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, holidays, training records and professional memberships).
- Personnel files and training records including performance information, disciplinary and grievance information, and working time records.
- Information about your use of our information and communications systems.
- Records of any reportable death, injury, disease or dangerous occurrence.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about an Employee's race or ethnicity.
- Information about an Employee's health, including any medical condition, accident, health and sickness records, including:
 - where an Employee leaves employment and under any share plan operated by a group company the reason for leaving is determined to be ill-health, injury or disability, the records relating to that decision;
 - details of any absences (other than holidays) from work including time on statutory parental leave and sick leave; and
 - where an Employee leaves employment and the reason for leaving is related to their health, information about that condition needed for pensions and permanent health insurance purposes.

WHY WE HOLD INFORMATION ON CLIENTS

It is necessary for us to retain data on clients in order for us to fulfil our contractual obligations and we must hold data for our legitimate business needs. It is important that we are able to process the above information to;

- Safeguard children
- Comply with OFSTED requirements and other legal obligations on us;
- Speak with GP's in case of an emergency
- Check eligibility for educational funding
- Support children's development and medical needs
- Medical information to ensure consent to administer medication to the child(ren)
- To process emergency / general communications
- Process HMRC checks for childcare / tax credit elements

We will only retain data which we reasonably require and for a period which is reasonably necessary.

We will not disclose your data to the third parties unless you have consented for us to do so or we are otherwise required to do contractually, in furtherance of our legitimate interest or under another law or enactment.

HOW IS CLIENT PERSONAL INFORMATION COLLECTED?

We collect personal information about clients from client's themselves. Parents will provide information about their child to us on their child's behalf. We may sometimes collect additional information from third parties including colleges, training companies and Department of Working Pensions and other government agencies or local authorities.

Employees:

We collect personal information about Employees through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information in the course of job-related activities throughout the period of when an Employee works for us.



HOW WE WILL USE INFORMATION ABOUT CLIENTS

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest [or for official purposes].

Situations in which we will use Employee personal information

We need all the categories of information in the list above (see Employee section within the Paragraph entitled 'The Kind of Information We Hold About You') primarily to allow us to perform our contracts with Employees and to enable us to comply with legal obligations. The situations in which we will process Employee personal information are listed below.

- Making a decision about an Employee's recruitment or appointment.
- Checking an Employee is legally entitled to work in the UK. Paying an Employee and, if an Employee is an Employee or deemed Employee for tax purposes, deducting tax and National Insurance contributions (NICs).
- Providing any Employee benefits to Employees.
- Enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties.
- Liaising with the trustees or managers of a pension arrangement operated by a group company, your pension provider and any other provider of employee benefits.
- Administering the contract we have entered into with an Employee.
- Conducting performance and/or salary reviews, managing performance and determining performance requirements.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about an Employee's continued employment, engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving Employees, including accidents at work.
- Ascertaining an Employee's fitness to work.



- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Equal opportunities monitoring.
- In order to re-numerate staff

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of an Employee's personal information.

Situations in which we will use Parent and children's personal information

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Dealing with legal disputes involving you.
- To prevent fraud.
- To market other products or services which we offer which may be of interest to you.
- To inform you about updates about the Company and advise you of any opportunities or promotions.
- To comply with our legal obligations including legal obligations surrounding safeguarding
- To comply with OFSTED inspections
- To report on a Child's attendance
- To be able to contact a Parent or a Child's emergency contact about their Child
- To ensure nursery fees are paid
- To assist in the development of the child(ren) and training and development of our staff

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

We will limit the use of personal data to what is reasonably required and data will only be used in a lawful manner.

In certain circumstances listed above, we hold your data in order to market other services to you. We



have a legitimate business interest in retaining your data for this purpose but you may 'opt out' of receiving marketing communications from us.

We may exchange your personal information if all, or substantially all, our assets are merged or acquired by a third party, or we expand or re-organise our business, in which case your personal information may form part of the transferred or merged assets or we may need to transfer your information to new entities or third parties through which our business will be carried out.

If Employees and Parents fail to provide personal information

If Employees and Parents fail to provide certain information when requested, we may not be able to perform the respective contracts we have entered into with Employees and Parents, or we may be prevented from complying with our respective legal obligations to Employees, Children and Parents.

Change of purpose

We will only use Your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use Your personal information for an unrelated purpose, we will notify the Employee, Child or Parent, as is appropriate in the circumstances, and we will explain the legal basis which allows us to do so.

Please note that we may process an Employee's, a Child's or a Parent's personal information without their respective knowledge or consent, as relevant to the circumstances, in compliance with the above rules, where this is required or permitted by law.

HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with Employee or Parent explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with Employee employment.
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect an Employee, a Child or a Parents' interests (or someone else's interests) and the Employee, Child or Parent as is appropriate is not capable of giving consent, or where the Employee or Parent has already made the information public.



The Nursery's obligations as an employer

We will use particularly sensitive personal information of Employees in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about the physical or mental health of an Employee, or their disability status, to ensure Employee health and safety in the workplace and to assess the fitness of Employees to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay, pensions and permanent health insurance.
- We will use information about an Employee's race or national or ethnic origin, religious, philosophical or moral beliefs, or an Employee's sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Do we need Employee consent?

We do not need the consent of Employees if we use special categories of personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach Employees for their written consent to allow us to process certain particularly sensitive data. If we do so, we will provide Employees with full details of the information that we would like and the reason we need it, so that Employees can carefully consider whether they wish to consent. Employees should be aware that it is not a condition of their contract with the nursery that they agree to any request for consent from us.

INFORMATION ABOUT CRIMINAL CONVICTIONS

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect the interests of You (or someone else's interests) and You are not capable of giving your consent, or where an Employee or a Parent, as is relevant to the circumstances, has already made the information public. Information regarding criminal convictions will only be held in relation to staff members, not in relation to the parents of children.

We may also process such information about members or former members of staff in the course of legitimate business activities with the appropriate safeguards.

We envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so, which includes but is not limited to Disclosure and Barring Service (“DBS”) checks. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us. We will use information about criminal convictions and offences in the following ways:

- To conduct a DBS check on each Employee, to record the date of the DBS check, the number of the DBS check and the name of the body conducting the DBS check.

We are allowed to use your personal information in this way to carry out our obligations. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified Employees or Parents of the decision and given the Employee or the Parent as is appropriate 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with an Employee or a Parent and appropriate measures are in place to safeguard the Employee’s, the Child’s or the Parent’s rights as is appropriate.
3. In limited circumstances, with explicit written consent from the Employee or the Parent, as is appropriate, and where appropriate measures are in place to safeguard Employee or Parent rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either explicit written consent from an Employee or a Parent as is appropriate, or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard an Employee or a Parents rights as is relevant in the circumstances.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified the Employee or the Parent as is appropriate in the circumstances.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or we may be prevented from complying with our legal obligations.



Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations
3. Where it is needed in the public interest

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

THE KIND OF INFORMATION WE HOLD ABOUT INDIVIDUALS OTHER THAN CLIENTS AND HOW THIS DATA IS USED

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

During the course of our day to day basis we acquire information regarding individuals other than our Clients and we will retain this data where we have a legitimate business reason to do so.

Typically, we acquire personal data on individuals other than our clients in the following circumstances:



1. Where individuals have made enquiries with us regarding possible services but have not subsequently become clients of the business;
2. Where we have dealt with individuals in the capacity as suppliers of services to the Company;
3. Where we have regular business-related dealings with you.
4. When liaising with the Council / social workers / teachers / health professionals / OFSTED / Children centres.

In many circumstances the extent of the data we hold is limited and may be publicly available by way of other websites but usually the information we will retain is limited to:

- Contact information including but not limited to email addresses, contact telephone numbers, business addresses and in some cases personal addresses.

We have a legitimate business interest in retaining this data on the basis that we must retain some personal data on third parties and suppliers in the ordinary course of business. We may also use this data to send marketing information to you in respect of promotions, events or other updates relating to us. We have a legitimate interest in retaining your data for this purpose however you have the right to ask us to erase or rectify your data and the right to opt out of receiving marketing information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

“Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group. The following third-party service providers process personal information about you for the following purposes:

- Bradford Metropolitan Council – data for funding purposes
- Bradford Metropolitan Council – professionals who support children
 - For example, inclusion and access officers
 - Early years teacher’s children’s centres.
- Speech and language therapists
- Paediatricians
- Health visitors
- Dieticians and other health and education professionals
- Teachers during transitions from Severn Lodge to other settings / school
- Bradford Safe Guarding Children Board
- OFSTED
- Colleges
- For the purpose of student finance
- Childcare voucher schemes regarding payments
- Government tax free childcare
- Regarding payments
- HMRC
- Tax credits and housing benefits.

Employees:



We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

- In order to re-numerate employees personal information will be shared with a trusted accountant.
- Information will be shared with financial professionals with regard to pensions, consent to opt out / enrol on a pension scheme will be given prior to commencement of your employment.
- Personal data will be shared with Government agencies if required, this may include deduction of earning attachment orders, information required by HMRC and DWP, however this list is not exhaustive and we will comply with Government legislation in relation to information sharing.
- Where we need to carry out our legal obligations
- Where it is needed in the public interest
- Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

DATA SHARING

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

Your data is stored on our computers and external hard drives. We do not intend for your data to be stored outside of the EU. Should this change, you can expect a similar degree of protection in respect of your personal information.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties not listed above as and when necessary, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

DATA SECURITY



We have put in place measures to protect the security of your information. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

The transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted online and transmission is made at your own risk. If you communicate with us by email then you assume the risks of such communications being intercepted, not received or delivered or are received by individuals other than the intended recipient.

DATA RETENTION

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

We are obliged to retain children's accident reports for 21 years and 3 months. Similarly, we are obliged to retain concerns and complaints reports for 21 years and 3 months. The reason for this is because children may go on to raise a complaint later in life but we cannot retain data indefinitely. The names, addresses and personal information will be held in addition to the reports but will be confidentially destroyed after this time. We therefore have a legitimate business interest in retaining the data should any subsequent legal proceedings or complaints ensue.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Marian Bentley, one of two Directors at Severn Lodge in writing or by email to severn lodge12345@aol.com

Please note that where you ask us to erase, correct, object to process or seek to restrict our processing of data we may refuse your request where we have a legal obligation, contractual or other legitimate business interest to refuse your request. If we refuse your request then we will notify you of this refusal and you will have the right to appeal.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.



RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Marian Bentley. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

DATA PROTECTION OFFICER

We have appointed a Data Privacy Manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact Marian Bentley, the data privacy manager. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

CONTACT AND FURTHER INFORMATION

If you have any questions about this privacy notice, please contact Marian Bentley, Director, by emailing severn lodge12345@aol.com

If you have any questions or wish to submit a complaint then please submit this to:

FAO Marian Bentley (Severn Lodge Ltd)

1 Severn Road

Bradford

BD2 4LS

You have the right to make a complaint to the Information Commissioners Office or such other regulatory body or supervisory authority as may be appointed from time to time. If you make a complaint then we will respond to let you know how your complaint will be handled.

