

Monkey Puzzle Day Nursery Privacy Notice

Monkey Puzzle Day Nurseries understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers, employees, franchisees, suppliers and everyone who visits our website, <https://monkeypuzzledaynurseries.com/> ("Our Site"). We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Information About Us

Monkey Puzzle Day Nurseries Ltd, registered in England and Wales under company number 05192967. Our registered address is Ground Floor, 4 Churchgates, Berkhamsted, Hertfordshire, HP4 2UB. We are a data controller, our ICO registration number is ZA118600.

What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details at the end of this privacy policy.
- b) The right to access the personal data we hold about you. The '*How Can I Access My Personal Data?*' section will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details at the end of this privacy policy.

- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details at the end of this privacy policy.
- e) The right to restrict (i.e., prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact using the details at the end of this privacy policy.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details at the end of this privacy policy.

What Personal Data Do You Collect and How Long Will You Keep My Personal Data?

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table.

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Data Collected	How We Collect the Data	How Long We Keep It
Job Applicant Information: Certificates, short-listing details, interview notes, references and other information included in a CV or	When you apply for a vacancy or send a speculative CV to us.	Minimum 6-months after recruitment campaign. Maximum 12-months, unless consent given to retain on file.

cover letter or as part of the application process.		
Employee Information: Job title, work history, working hours, copy of passport, driver's licence, contract of employment, annual leave days, sick leave, exit interview notes, grievances & disciplinary, DBS checks (<i>if applicable</i>), car registration, emergency contact details and bank details.	As part of the application process and then throughout your employment with us.	Employee file: 6 years after end of employee contract/termination date. Right to work: 3 years from employment ceasing PAYE records: 6 years
Franchisee Enquiries: contact details, including email address and telephone number.	When you enquire about Monkey Puzzle Day Nurseries franchising opportunities.	24-month after completing enquiry form.
Franchisee Information: contact details, franchisee agreement, financial details, bank details	When you become a Monkey Puzzle Day Nurseries franchisee. When you correspond with us by phone, email or other electronic means, or in writing, or when you provide information directly to us, including in conversation with a member of our head office team.	Financial records: 7 years after then end of the financial year. Franchisee file: duration of franchisee agreement, then 7 years.
Supplier Information: contact information (incl. business email address), bank details and purchase orders.	When you or your company offer to provide, or provides, services to us.	2 years after last purchase order. Financial records: 6 years after the end of the financial year.
Technical information including: Includes IP address, device screen size, browser type and version, time zone setting and geographic location, browser plug-in types and versions, operating system and platform and other technology on the devices you	When you or your company access and use our website.	Cookies are retained for a minimum of 1, maximum of 2 years.

use to access this website, and preferred language		
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How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we will use your personal data, and our lawful bases for doing so:

What Data We Use	How We Will Use Your Data	Our Lawful Basis
Job Applicant Information: Certificates, short-listing details, interview notes, references and other information included in a CV or cover letter or as part of the application process.	<ul style="list-style-type: none"> Deciding about appointing you. Checking you are legally entitled to work in the UK. Retaining CV and contact details for unsuccessful candidates 	As required by MPDN to conduct our business and pursue our legitimate interests. Legal Obligations Consent
Employee Information: Job title, work history, working hours, copy of passport, driver's licence, contract of employment, annual leave days, sick leave, exit interview notes, grievances & disciplinary, DBS checks (<i>if applicable</i>), car registration, emergency contact details and bank details.	<ul style="list-style-type: none"> Determining the terms on which an employee will work for the company. Administering the contract, the business has entered into with an employee. assessing qualifications for a particular job or task, including decisions about promotions. gathering evidence for possible grievance or disciplinary hearings dealing with legal disputes involving employee, including accidents at work. Managing sickness absence. Paying employees and deducting tax and National Insurance contributions. 	Fulfilment of employment contract Legal obligation Legitimate Interest (emergency contact details)
Franchisee Enquiries: contact details, including email address and telephone number.	<ul style="list-style-type: none"> when you respond to a marketing campaign (e.g. online via Franchise UK) when you make an enquiry 	As required by MPDN to conduct our business and pursue our legitimate

	<p>through the Monkey Puzzles website (contact form/email)</p> <ul style="list-style-type: none"> • you make an enquiry via phone or through social media channels. 	interests.
<p>Franchisee Information: contact details, franchisee agreement, financial details, bank details</p>	<ul style="list-style-type: none"> • processing licencing fee payments; • processing monthly revenue summary and deducting managed service fee. • maintaining accounting records, compliance checks. 	<p>To fulfil the franchise agreement, or take steps linked to a franchise agreement;</p> <p>As required to conduct our business and pursue our legitimate interests.</p>
<p>Supplier Information: contact information (incl. business email address), bank details and purchase orders.</p>	<ul style="list-style-type: none"> • processing invoice payments; • ordering/purchasing products and services from supplier as agreed by supplier or individual within supplier organisation; • negotiate group discount with equipment supplier on behalf of franchisees. 	<p>Contractual obligation</p> <p>Legitimate Interest (negotiating group discount)</p>
<p>Technical information including: Includes IP address, device screen size, browser type and version, time zone setting and geographic location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website, and preferred language</p>	<ul style="list-style-type: none"> • To analyse your use of our website; • To monitor performance of website; 	<p>Consent. Please refer to How Do You Use Cookies? for more full details.</p>

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and telephone with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details at the end of the privacy notice.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

How and Where Do You Store or Transfer My Personal Data?

We will store some or all of your personal data in countries outside of the UK. These are known as “third countries”. We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

- We will only store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the Information Commissioner’s Office.
- We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the Information Commissioner’s Office.

Please contact using the details below for further information about the particular data protection mechanisms used by when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality.
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so.
- adhering data protection policies, procedure and processes including, physical security, access control, data classification and password.

Do You Share My Personal Data?

We may sometimes contract with the following third parties to supply certain products and services.

Recipient	Activity Carried Out	Sector	Location
Accountants (<i>data controller</i>)	Annual financial accounts	Financial	UK
Accounting Software (<i>data processor</i>)	Provision of accounting software	Information Technology (software)	USA
Lawyers (<i>data controller</i>)	Provision of legal services	Legal	UK
Website Design & Hosting	Website hosting, design and support	Information Technology	EEA

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

How Can I Access My Personal Data?

If you want to know what personal data, we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests can be made in writing either via email or postal addresses shown in below, or verbally, either in person or on the phone.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more

time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

How Do You Use Cookies?

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended. You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.

Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables us to improve Our Site and the services offered through it.

The analytics services used by Our Site uses Cookies to gather the required information. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable us to continually improve Our Site, making it a better and more useful experience for you.

We use Hotjar in order to better understand our users' needs and to optimise our service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g., how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf.

The analytics services used by Our Site uses the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose	Duration
_gid	First	Google	The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how Our Site is doing.	Session
_ga	First	Google	This cookie is used to identify unique users.	2 years
_hjClosedSurveyInvites	First	HotJar	Hotjar cookie that is set once a visitor interacts with an External Link Survey invitation modal. It is used to ensure that the same invite does not reappear if it has already been shown.	365 days
_hjDonePolls	First	HotJar	Hotjar cookie that is set once a visitor completes a survey using the On-site Survey widget. It is used to ensure that the same survey does not reappear if it has already been filled in.	365 days
_hjMinimizedPolls	First	HotJar	Hotjar cookie that is set once a visitor minimizes an On-site Survey widget. It is used to ensure that the widget stays minimized when the visitor navigates through your site.	365 days
_hjShownFeedbackMessage	First	HotJar	Hotjar cookie that is set when a visitor minimizes or completes Incoming Feedback. This is done so that the Incoming Feedback will load as minimized immediately if the visitor navigates to another page where it is set to show.	365 days
_hjid	First	HotJar	Hotjar cookie that is set when the customer first lands on a page with the Hotjar script. It is used to persist the Hotjar User ID, unique to that site on the browser. This ensures that behavior in subsequent visits to the same site will be attributed to the same user ID.	365 days
_hjRecordingLastActivity	First	HotJar	This should be found in Session storage (as opposed to cookies). This gets updated when a visitor recording starts and when data is sent through the WebSocket (the visitor performs an action that Hotjar records).	Session
_hjTLDDTest	First	HotJar	When the Hotjar script executes we try to determine the most generic cookie path we should use, instead of the page hostname. This is done so that cookies can be shared across	Session

			subdomains (where applicable). To determine this, we try to store the _hjTLDTTest cookie for different URL substring alternatives until it fails. After this check, the cookie is removed.	
_hjUserAttributesHash	First	HotJar	User Attributes sent through the Hotjar Identify API are cached for the duration of the session in order to know when an attribute has changed and needs to be updated.	Session
_hjCachedUserAttributes	First	HotJar	This cookie stores User Attributes which are sent through the Hotjar Identify API, whenever the user is not in the sample. These attributes will only be saved if the user interacts with a Hotjar Feedback tool.	Session
_hjLocalStorageTest	First	HotJar	This cookie is used to check if the Hotjar Tracking Script can use local storage. If it can, a value of 1 is set in this cookie. The data stored in _hjLocalStorageTest has no expiration time, but it is deleted almost immediately after it is created.	Under 100ms
_hjIncludedInPageviewSample	First	HotJar	This cookie is set to let Hotjar know whether that visitor is included in the data sampling defined by your site's pageview limit.	30 minutes
_hjIncludedInSessionSample	First	HotJar	This cookie is set to let Hotjar know whether that visitor is included in the data sampling defined by your site's daily session limit.	30 minutes
_hjAbsoluteSessionInProgress	First	HotJar	This cookie is used to detect the first pageview session of a user. This is a True/False flag set by the cookie.	30 Minutes
_hjFirstSeen	First	HotJar	This is set to identify a new user's first session. It stores a true/false value, indicating whether this was the first time Hotjar saw this user. It is used by Recording filters to identify new user sessions.	Session
hjViewportId	First	HotJar	This stores information about the user viewport such as size and dimensions.	Session
_hjRecordingEnabled	First	HotJar	This is added when a Recording starts and is read when the recording module is initialized to see if the user is already in a recording in a particular session.	Session

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept

Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of GDPR Lead:

Email address: info@monkeypuzzledaynurseries.com

Postal address: Monkey Puzzle Day Nurseries Ltd, Ground Floor, 4 Churchgates, Berkhamsted, Herts, HP4 2UB

Phone: 01442 878887

Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be made available via email. This Privacy Notice was last updated on 26th March 2021.