

GDPR Privacy Policy

This Privacy Notice explains in detail the types of personal data we may collect about you (as a teacher and leader) or your school (as a client) or you (as a parent/carer) and about your child when you interact with us. It also explains how we will store and handle that data and keep it safe.

It is likely that this Privacy Notice will need to be updated from time to time. We will notify you each time we make a change, but you are welcome to revisit this privacy notice on our website at any time.

Company Structure

ClubsComplete is a Company Limited by Guarantee and is registered on Companies House with number: England and Wales: 07383812.

School Consent

We use school information that is readily available on the internet and will only contact schools whose phone numbers are not registered with TPS. We also use the UK Education Data for which your school will have provided consent to the data organisation for our company to contact you.

Furthermore, we will only ever contact schools regarding services that may genuinely be of interest to them and may help them achieve targets on their School Improvement Plan.

Client Consent

By signing an SLA with us, your school is automatically providing us with consent to contact you using the details provided during the booking process. We will only contact you regarding your provision and other provisions that may be of interest to you. After your SLA terminates with us, your details will be filed for five years and will be permanently deleted thereafter. We may contact you after your provision has ended with us regarding complimentary training days or trials that may be of interest to you. You have the right for your consent to be withdrawn at any time by replying to any of our correspondence: "Unsubscribe".

Employees:

Once you are employed or enter a subcontractor contract, we need your personal data to comply with our contractual obligations. For example, to add you to our payroll, we will need your full name, date of birth, home address and bank details. These will be stored confidentially on our CRM and you will access your payslips in a secure log-in area to protect your security.

All of your personal information, including copies of your identification and DBS details, will be stored in our secure CRM and schools will access this information by logging-in to their secure and private area of our website.

By signing a contract with us, you are automatically giving us consent to contact you for future opportunities to provide you with work – whether that be on an ad-hoc or permanent basis.

Upon termination of your contract with us, we will ask you to complete a form if you would like us to keep your details on file for any future opportunities. If you do not wish to be contacted for future opportunities, we have to keep your details on file for five years to comply with employment law. However, your data will not be used and will remain dormant.

Legal compliance

If the law requires us to, we may need to collect and process your data. For example, we may need to pass on details of people involved in fraud or criminal activity to law enforcement.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will use your purchase history information of ClubsComplete services you have previously purchased from us;

For parents to send you personalised offers, upcoming events at the school or setting you have booked, upcoming events in the area, newsletters and updates about the setting/ school. We will also use your address details to send you direct marketing information by post, telling you about our services that we believe may interest you.

For schools to send you personalised offers or complimentary training or trials. We will also use your address details to send you direct marketing information by post, telling you about our services that we believe may interest you.

When do we collect your personal data?

- When you visit our website and complete our enquiry form or application form
- When you complete a booking for a service we offer at a school/ setting on our website system 'My Club'
- When you complete an SLA with us
- When you respond to any of our "job opportunity" emails
- When you enter employment with us
- When you engage with us on social media
- When you contact us by any means with enquiries or complaints
- When you enter competitions or prize draws through any of our channels
- When you book a meeting with us
- When you choose to complete any surveys we send you

- When you comment on or review our services via any channel
- When you have given a third party permission to share information with us

We collect data from publicly-available sources for publicising our services, and therefore you have given consent by uploading and sharing your contact details to a publicly available source or where information is made public as a matter of law.

When you visit our Head Office premises or schools, we have CCTV in place for the security of our staff and clients. These systems may record your image during your visit.

What type of information do we retain on file?

Schools:

- Your first and last name
- School name
- School telephone number
- Mobile number (if provided)
- E-mail address for an individual in school or school e-mail
- Finance e-mail (bursar or business manager)
- An encrypted record of your log-in password for our site
- Details of any interactions or conversations with our team
- Information gathered by the use of cookies in your web browser
- Personal details which help us to recommend services of interest

Employees/Subcontractors:

- Your first and last name
- Address
- NI number
- UTR number (subcontractors only)
- VAT number (subcontractors only)
- Bank details
- Telephone number(s) provided
- DBS number and issue date
- Nationality and right to work documentation
- Vetting form (details you gave consent for when completing application form)
- An encrypted record of your log-in password for our site and software
- Details of any interactions or conversations with our team
- Personal details which help us to recommend opportunities of interest
- Copies of documents you provide during application process

Parent/Carer and Child:

- Your first and last name
- Your telephone number
- Your Mobile number
- Your E-mail address
- Emergency contact details for other people you have given for the child you have booked in to one of our services. These details are as follows First and last name, telephone number, mobile number, e-mail address
- Child's school name
- Child's first and last name
- Date of birth of the child
- Medical conditions or allergies of the child
- Any additional information you have provided us on your booking for the child
- Medical forms completed by you if applicable for your child
- Additional registration form completed by you if applicable for your child which will include;
Personal information – e.g. names, contact details, addresses, parental responsibilities, emergency contact details, collection details
Characteristics – e.g. ethnicity, language, nationality, country of birth
Relevant medical information, dietary requirements and SEND
Permissions – e.g. First aid and medical, Photographs
- Accident/ Incident forms completed by us at a school/ setting for your child
- Information relating to SEND
- Behavioural information e.g. behaviour forms and slips
- Assessment information – e.g. EYFS reports, assessment reports
- Details of any interactions or conversations with our team
- Personal details which help us to recommend services of interest

Why do we use your personal data?

We want to make all educators on file aware of any new opportunities that arise that may be of legitimate interest to them. We also want all schools on file aware of any new services we offer or any changes in availability for services in their area. We want parents/ carers to be aware of upcoming events at the school/ setting they use or those that are happening in their area, information regarding the setting/ school they use the services at, contacting regarding payments, information regarding your child, information regarding the company such as change of address. Furthermore, we only store personal information that allows us to function as a business.

The data privacy law allows this as part of our legitimate interest in understanding our clients, teachers, parents/ carers and ensuring that all opportunities are offered to all educators, parents/carers and that none are prioritised or discriminated against.

It is important that you are aware that if you choose not to share your personal information with us, we may not be able to provide some services that you require. For example, if you have asked us to contact you if any "Art work" becomes available in "Luton", we will not be able to if you have withdrawn your general consent for us to contact you.

How do we process your data?

We process your data if you are a new teacher that has signed up to us in order for us to contract you to work. We also process your data if you are a new school that has enquired or signed their SLA in order for us to provide you with a teacher, monitor that provision and charge your school for that provision. We also process your data if you are a parent/ carer that has booked a service for a child at one of our school/ settings.

We know how much data protection matters to all of our potential teachers, schools and parents/carers and all of our existing teachers, schools and parents/carers. For this reason, your data is treated with care and precision.

All of our client and employee data is stored in our web-based CRM all of our manual systems and data ecosystems are constantly updated, reviewed and amended (if necessary).

All of our parent and children's data is stored on the internal database on our website which is constantly updated, reviewed and amended (if necessary). Paperwork relating to your child at a particular setting is stored in a lockable room in the appropriate files.

Your data will only be used to communicate with you regarding your provision and will not be shared with third parties.

When signing up with us, parents are required to create a log in on our website www.clubscomplete.co.uk which is hosted securely and privately in compliance with GDPR.

When a school signs up for a Parent Pay service, you will receive a log in to our website, www.clubscomplete.co.uk. As a school, you can access your registers to view the details of children attending at the setting.

Our staff are not permitted to use USBs and you must not share class lists or school data with them. Our staff are not permitted to use personal laptops or iPads in school, they must use school computer hardware in order to comply with GDPR.

Who will we share your data with?

- If you are a teacher, the school(s) you are working in on our behalf via our secure log-in
- If you are a school, your data will be shared with the teacher/ activity leader(s) we contract for your school
- If you are a parent and child, your data will be shared with the teacher/ activity leader(s) who will be running the services you have booked
- We may share your details with third parties if there is ever the need to outsource any of our work to other organisations. These organisations will always comply with our Data Privacy Notice and your data will be treated in the same way.

Your rights over your personal data:

- You have the right to request access to your personal we hold about you, we may charge a £10 administration fee for this service
- The correction of your personal data when incorrect, out of date or incomplete
- That we stop contacting you for direct marketing opportunities

To be removed from our files (unless we are legally obliged to keep your details on file)

To ask for a copy of the information we hold about you, please contact:

ClubsComplete Ltd Unit T2,

Ivanhoe Park Way,

Ivanhoe Office Park,

Ashby-de-la-Zouch