 Privacy Policy – effective from May 25 2018

Dinky Ones Early Years Consultancy respect your privacy. This policy explains what personal data (information) we hold about you, how we collect, how we use and may share information about you.  We are required to give you this information under data protection law.

Dinky Ones Early Years Consultancy collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws. Our Data Protection Lead is Sally Gridley. We are registered with the Information Commissioners Office (ICO) Registration Number ZA433968

 This policy does not apply to third-party websites, products or services, even if they link to our services and you should read the individual privacy notices of those third parties carefully.

Information collected by us

In the course of administering the products and services provided by Dinky Ones Early Years Consultancy we collect the following information, electronically and/or in hard copy, when you provide it to us:

* The name of the key contact within the setting
* The contact telephone number(s) of the setting
* The email address provided by the setting
* Transactions and products purchased

In the case of 1:1 clients we may also collect sensitive data in relation to the management of your business. Such information is strictly kept to a minimum and only collected if required for the purposes of administering our service to you. Further information on how we use this data can be found in your Service Level Agreement (SLA) provided at the commencement of contracted services.

Our store is hosted on Wix.com Ltd. They provide us with the online e-commerce platform that allows us to sell our products and services to you. Your data is stored through Wix’s data storage, databases and the general Wix application. They store your data on a secure server behind a firewall. If you choose a direct payment gateway to complete your purchase, then Wix stores your credit data for as long as is necessary to complete your purchase. Further information is available in the [Wix Privacy Policy.](https://www.wix.com/about/privacy) This information is additionally collected by the gateway service providers, [Stripe](https://stripe.com/gb/privacy) and [PayPal.](https://www.paypal.com/uk/webapps/mpp/ua/privacy-full) Credit Card data is encrypted through the Payment Card Industry Data Security Standard (PCI-DSS) as managed by the PCI Security Standards Council. Transactions which occur via invoice are processed using our accounting system [Wave](https://my.waveapps.com/privacy/), which stores only the contact details of the customer.

How we use your personal information

Many of our services do not require any form of registration, allowing you to visit our website without telling us who you are. However, where you are asked to provide us with personal information we may use this to:

* Communication with both 1:1 clients and members of The Business Club in the course of providing subscribed to services;
* Provide you with products or services;
* Bill you for products and services you request;
* Market products and services which we think may be of interest to you

How long your personal data will be kept

We will hold your personal information securely and retain it from the point you subscribe to a service or purchase a product until:

* 1:1 clients – one month from the end of your Service Level Agreement
* The Business Club members – one month after the end of your annual subscription if you choose not to renew
* Customer transaction details via credit card or invoice – six years in accordance with HMRC requirements for financial history

Following these retention periods Dinky Ones Early Years Consultancy will delete electronic and any hard copies of the information held.

Reasons we can collect and use your personal information.

In the purchase of products from our website we base our legal basis for collection on implied consent to collect and use your personal information.

For one to one clients and members we rely on consent to collect and use your information.

Sharing personal information

The information that you provide to Dinky Ones Early Years Consultancy will be regarded as confidential. We will not share your personal information with anyone without consent unless the law allows us to or in the following circumstances:

* To prevent significant harm arising to children, young people or adults;
* Where we are under a legal obligation to do so, for example where we are required to share information under statute, to prevent fraud and/or other criminal offences.

In such instances we will share your personal information with law enforcement and/or other authorities as required by applicable law.

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information unless we provide you with advance notice. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential.

Your rights

Under the GDPR and Data Protection Act 2018 you have rights which you can exercise that allow you to:

* Know what we are doing with your information and why we are doing it
* Ask to see what information we hold about you (Subject Access Requests)
* Ask us to correct any mistakes in the information we hold about you
* Object to direct marketing
* Make a complaint to the Information Commissioners Office
* Withdraw consent (if applicable)

Depending on our reason for using your information you may also be entitled to:

* Ask us to delete information we hold about you
* Have your information transferred electronically to yourself or to another organisation
* Object to decisions being made that significantly affect you
* Object to how we are using your information
* Stop us using your information in certain ways

We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties. Please note: your request may delay or prevent us delivering a service to you.

For further information about your rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioners Office (ICO) on individuals’ rights under the General Data Protection Regulation.

If you would like to exercise a right, please contact us at hello@dinkyones.com

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used in an unauthorised way. Access to your personal data is limited only to those who have a genuine business need to know it. The collection and processing of your information will be done so in an authorised manner.

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

We also have procedures in place to deal with any suspected data security breach. We will notify you and the Information Commissioners Office (ICO) of any suspected data security breach where we are legally required to do so.

Who to contact

To exercise any of your rights, or to make a complaint about why your information has been collected, how it has been used or how long we have kept it for please contact our Data Protection Lead, Sally Gridley, at hello@dinkyones.com Our office is located within a private address and is therefore not made public. Any correspondence should be made via email in the first instance.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns or telephone 03031 231113.