

Manor Montessori Ltd.

Privacy Notice for Parents & Guardians

1.0 Introduction

This document describes how we, Manor Montessori Ltd., use your personal information during and after your child attendance relationship with us, in accordance with the General Data Protection Regulation. You have a number of rights in relation to you and your child's information including the right to object to processing of your personal information where that processing is carried out for a legitimate interest. We will comply with the terms of the General Data Protection Regulation and all other relevant data protection legislation.

2.0 Data Controller and Data Management Officer

Manor Montessori Ltd is the Data Controller for your data. Gabriel Reilly is the data management officer in our organisation and his contact details are as follows.

Tel: 01 490 2648; **Email:** gjreilly@manormonti.ie

3.0 What information we collect

We may collect the following personal information for both parents and their children attending the school: name, title, address, telephone numbers and personal email address, date of birth, gender, emergency contact information, PPS number, start date, form of identification, and collection information. In respect of children attending the school we may also collect GP details, immunisation records, health records, dietary needs, and development records. We may also collect intercom footage and other information obtained through electronic means, information about your use of our information and communication systems and photographs.

4.0 How your personal information is collected.

We collect personal information about parents and children through the child registration process, either directly from parents or guardians or sometimes through statutory bodies such as Tusla and DCYA. We will collect additional personal information on your child in the course of school-related activities throughout the period of your child attending the school.

5.0 The purpose and legal basis for processing your information

We need all of the categories of information listed above primarily to allow us to perform our contract with you and our contracts with Tusla and DCYA, and to enable us to comply with various 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, the purposes for that processing and the legal basis upon which we rely in order to process that information are set out below.

1. to make a decision about registration of your child, to determine the terms upon which your child attends the school, to liaise with Tusla, DCYA and other statutory authorities, and to administer the contract we have entered into with you and with Tusla and DCYA as applicable. Where we process your information for the purposes set out in this paragraph, we rely on the lawful processing ground that the processing is necessary for the performance of a contract to which the Data Subject (i.e. you) are a party.
2. Business management and planning including accounting and auditing, management performance and determining performance requirements, to prevent fraud, to monitor your use of our information and communication systems, to ensure compliance with our IT policies. Where we process your information for the purposes set out in this paragraph, that processing is necessary for the purposes of our legitimate business interests pursued by us except where those interests are overridden by your interests or fundamental rights and freedoms. The legitimate business interest upon which we rely is the effective operation and management of our organisation and managing the performance of our employees.

6.0 Your Information and Third Parties

We may have to share your data with third parties, including third party service providers. Third party service providers include IT services, accounting and business management services.

All the personal data is processed by management or by staff designated by Management. To deliver our services effectively, we may need to exchange your details with:

- The relevant funding bodies such as DCYA, Pobal, and the Childcare Committees,
- Regulators such as TUSLA or the Revenue Commissioners,
- Inspectors (TUSLA, Department of Education and Science and Health & Safety Authority),
- External personnel such as HR contractors, accountants and professional advisors.

All of our third party service providers 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 specific purposes and in accordance with our instructions. We may also share your personal information with other third parties, for example in the context of a possible sale or restructuring of the business. We may also need to share your personal information with the revenue commissioner, or a regulator or to otherwise comply with the law.

7.0 Data Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes we collected for, including for the purposes of satisfying any legal, accounting or reporting requirements. We will retain personal data in respect of your child's attendance with us for a period of seven years from the date your child ceases to attend the school by reference to the statute of limitations.

8.0 Your Rights

You have several rights under data protection law in relation to how we use your personal information. You have the right, free of charge, to:

1. request a copy of the personal information we hold about you
2. rectify any inaccurate personal information we hold about you
3. erase personal information we hold about you
4. restriction of processing of your personal information
5. object to our use of your personal information for our legitimate interests
6. receive your personal information in a structured, commonly used and machine readable format and to have that data transmitted to another data controller.

These rights are in some circumstances limited by data protection legislation. If you wish to exercise any of these rights please contact Gabriel Reilly at Manor Montessori Ltd. We will endeavour to respond to your request within a month. If we are unable to deal with your request within a month we may extend this period by a further two months and we will explain why.

You also have the right to lodge a complaint to the office of the Data Protection Commission.

E-mail: dpo@dataprotection.ie

Address: Data Protection Commissioner, 21 Fitzwilliam Square South, Dublin 2, D02 RD28

9.COVID-19 Addendum

During the period of the COVID-19 Pandemic, we will also collect data with respect to the COVID-19 health of your child and contact details to be used in the contact-tracing processes. This information will be, in relation to the previous 14 days:

- (i) whether your child has been diagnosed with COVID-19 or suspected COVID-19;
- (ii) Whether your child has any symptoms of Covid-19;
- (iii) Whether your child has been asked to self-isolate;
- (iv) Whether your child is awaiting a Covid-19 test result;
- (v) Whether your child is a close contact with a suspected or confirmed case of Covid-19;
- (vi) Whether your child has travelled outside Ireland

The information will be collected through the use of a Parental Declaration form to be completed on first entry to the school, and to be repeated following each period of absence.

Parent contact details, child's DOB and other relevant data normally collected (sections 1.0 to 8.0 above) at the school may be used to inform HSE Contact Tracers in their duties to track COVID-19 infections.

Processing of this information is necessary in order to minimise the risk of bringing COVID-19 into the school and thereby implement our obligations to protect health & safety of employees and children under Health & Safety Legislation. · Processing is also necessary to protect your child's vital interests (Article 6(1)(d) and Article 9(2)(c) GDPR).

We will only retain this information while it remains necessary to do so i.e. until the end of the Pandemic and for one year thereafter.