



Customer Privacy Policy

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Purpose of this Policy

This privacy notice tells you what to expect us to do with your personal information.

Contact details

Telephone: +44 (0) 7969 835629
Email: hello@kidsway.org.uk

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery**:

- Names and contact details
- Addresses
- Purchase or account history
- Credit reference information
- Health information (including dietary requirements, allergies and health conditions)
- Health and safety information
- Account information
- Website user information (including user journeys and cookie tracking)
- Photographs or video recordings
- Call recordings
- Records of meetings and decisions
- Identification documents
- Information relating to compliments or complaints
- Information relating to sponsorship

We collect or use the following information for **the operation of customer accounts and guarantees**:

- Names and contact details
- Addresses
- Purchase history
- Account information, including registration details
- Information used for security purposes
- Marketing preferences

We collect or use the following information to **prevent, detect, investigate or prosecute crimes**:

- Names and contact information
- Customer or client accounts and records
- Video and CCTV recordings of public areas (including indoor and outdoor spaces)
- Audio recordings of public areas (including indoor and outdoor spaces)
- Video and CCTV recordings of private or staff only areas
- Call recordings
- Financial transaction information
- Information relating to health and safety

We collect or use the following information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Location data
- Recorded images, such as photos or videos
- Call recordings
- Purchase or viewing history
- IP addresses
- Website and app user journey information
- Information relating to sponsorship
- Records of consent, where appropriate

We collect or use the following information for **research or archiving purposes**:

- Names and contact details
- Addresses
- Location data
- Recorded images, such as photos or videos
- Call recordings
- Purchase or viewing history

- IP addresses
- Website and app user journey information
- Personal information used for administration of research
- Personal information used for the purpose of research
- Records of consent, where appropriate

We collect or use the following information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Financial transaction information
- Any other personal information required to comply with legal obligations
- Health and safety information
- Safeguarding information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Video recordings of public areas
- Audio recordings of public areas
- Video recordings of private or staff only areas
- Audio recordings of private or staff only areas
- Call recordings
- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with.
- Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- Your right to erasure - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- Your right to object to processing - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.
- If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information to **prevent, detect, investigate or prosecute crimes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **research or archiving purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our legitimate interests are:

- Should Kidsway Portfolio Limited expand our portfolio, or work in the areas of existing customers, we may reach out to them to share any shared interests. Should Kidsway Portfolio Limited explore any new business opportunities, we may consider our customer portfolio and our connected interests before investing. Should Kidsway Portfolio Limited need to measure their return on investment, success within local communities, we may reflect on existing data.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an

urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We may consider other external factors when addressing complaints, enquiries in an attempt to reach a resolution.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Where we get personal information from

- Directly from you
- CCTV footage or other recordings
- Insurance companies

- Councils and other public sector organisations
- Publicly available sources
- Market research organisations
- Credit reference agencies
- Suppliers and service providers

How long we keep information

We retain personal data for a period of five (5) years unless a longer retention period is required by law or is necessary for the establishment, exercise, or defense of legal claims. During this retention period, personal data is stored securely and processed only for the purposes for which it was originally collected, in line with the principles of lawfulness, fairness, transparency, and data minimisation under the UK GDPR.

At the end of the five-year period, personal data is either:

- Securely deleted,
- Irretrievably anonymised, or
- Archived in a restricted-access environment where continued retention is legally justified.

We review our retention schedules regularly to ensure ongoing compliance with the UK GDPR and the Data Protection Act 2018. For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Who we share information with

Others we share personal information with

- Insurance companies
- Organisations we need to share information with for safeguarding reasons
- Professional or legal advisors
- Financial or fraud investigation authorities
- Relevant regulatory authorities
- External auditors or inspectors
- Warranty and guarantee providers
- Professional consultants
- Organisations we're legally obliged to share personal information with
- Emergency services
- Suppliers and service providers

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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