



Privacy Notice – Brilliant Beginnings

- Updated May 2018 in accordance with GDPR Legislation

We are committed to safeguarding the privacy of our clients and website visitors; this policy sets out how we will treat your personal information.

INTRODUCTION

This notice refers to **personal data**, which is defined as information concerning any living person (Data Subject) that is not already in the public domain.

The **General Data Protection Regulation (GDPR)** seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

PERSONAL DATA

Brilliant Beginnings uses the information collected from you to provide you with new information either via email or newsletter about our services, make telephone contact and to email you marketing information which we believe may be of interest to you. If you consent to receiving Marketing Information from **Brilliant Beginnings**, we shall maintain a marketing dialogue with you until you either **opt out** (which you can do at any stage – just let us know by email), or we decide to desist in promoting our services. Some personal data may be collected about you from the website contact forms and surveys you complete, also from records of our correspondence and phone calls and details of your visits to our website.

We shall store your information on password protected computers and/or secure servers. We have a protocol in place to update and change passwords twice a year, to ensure online security.

Currently our website does not use cookies which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. However, we may use cookies in the future to: enable our website to recognise you when you visit. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

We use **Google Analytics** to analyse the users journey on our website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website and to inform us how we might make the user experience better. Google will store this information. Google's privacy policy is available at: <https://www.google.com/privacypolicy.html>.

The Information we at **Brilliant Beginnings** hold about you encompasses all the details you provided to us along with any sales transactions including any third-party information we have obtained about you from public sources.

We will only collect the information needed so that it can provide you with the best service, we do not sell or broker your data.

THE LEGAL PART

In order for us to process personal data we must have a lawful purpose for doing so. This is outlined below.

LEGITIMATE INTEREST

When you provide your personal details to us, we use your information for our legitimate business interests. Before doing this, we will carefully consider and balance any potential impact on you and your rights.

The following are some examples of when and why we would use this approach.

Direct Marketing

We may send Direct marketing information via email but we will make sure our direct marketing is relevant to you and where possible tailored to your interests. You can opt out anytime.

Online Bookings

In order for us to process a booking, payment details are taken and contact information collected, such as name, address, telephone number and email address. You will be required to make payment directly into our bank account. Details will be provided at the time of booking.

Personalisation

Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our guests and visitors.

Why we use Google Analytics

To process your personal information for the purposes of customer analysis, assessment, profiling and direct marketing, on a personalised or aggregated basis, to help us with our service offers and to provide you with the most relevant information as long as this does not harm any of your rights and interests.

Research

To determine the effectiveness of promotional campaigns and advertising and to develop our products, services, systems and relationships with you.

Due Diligence

We may need to conduct investigations on potential customers and business partners to determine if those companies and individuals have been involved or convicted of offences such as fraud, bribery and corruption. Any communication we send in this manner will give you the opportunity to unsubscribe very easily.

CONSENT

We also rely on consent for lawful processing where we have no legitimate interest. An example of this may be when you sign up to receive marketing through our website. Every marketing email we send gives you the opportunity to withdraw consent by unsubscribing.

DISCLOSURE

We may on occasion, pass your Personal Information to third parties exclusively to process work on our behalf, ie Workshop or Event venue. If this is the case, we will be able to provide you with their privacy policy on request.

We do not broker or pass on information gained from your engagement with us without your consent. However, we may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. We may also enforce our Terms and Conditions, including investigating potential violations of our Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Brilliant Beginnings, our clients and/or the wider community.

RETENTION POLICY

We will process personal data during the duration of any contract and will continue to store only the personal data needed for **five years** after the contract has expired to meet any legal obligations. After five years any personal data not needed will be deleted.

DATA STORAGE

Currently our website is hosted by Blacknight and 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. Currently this website serves purely promotional purposes and is not used for direct e-commerce or any online transactions. We do not use Malware scanning. Blacknight privacy policy can be viewed here - <https://www.blacknight.com/legal/gdpr/>

YOUR RIGHTS

At any point whilst Brilliant Beginnings is in possession of or processing your personal data, all data subjects have the following rights:

- Right of access - you have the right to request a copy of the information that we hold about you.
- Right of rectification - you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten - in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing - where certain conditions apply you have a right to restrict the processing.
- Right of portability - you have the right to have the data we hold about you transferred to another organisation.
- Right to object - you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling - you also have the right not to be subject to the legal effects of automated processing or profiling.

YOU CAN REQUEST THE FOLLOWING INFORMATION

- Contact details of the data protection officer, where applicable.

- The purpose of the processing as well as the legal basis for processing.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored?
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To access what personal data is held, identification will be required

We will accept the following forms of ID when information on your personal data is requested: a physical original of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If we are dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to the Data Controller of Brilliant Beginnings and/or to the Director of Brilliant Beginnings - **Lorna Murphy** - info@brilliantbeginnings.ie