



DATA PROTECTION POLICY

Monkey Puzzle Day Nurseries Ltd and the local Monkey Puzzle Day Nursery are data controllers (as defined in the Data Protection Legislation) in respect of the personal data collected and used by both parties for the operation of the local nursery.

We use the following terms in this policy:

Data Protection Legislation means all applicable laws relating to the processing, privacy, and/or use of Personal Data including but not limited to, the Privacy and Electronic Communications (EC Directive) Regulations 2003, the General Data Protection Regulation (EU) 2016/679 and any laws implementing, replacing or supplementing the same.

Data Subject has the meaning given to it in Data Protection Legislation.

Data Subject Request means a request made by a Data Subject to exercise any rights of Data Subjects under Data Protection Legislation.

Personal Data has the meaning given to it in the Data Protection Legislation.

Personal Data Breach means any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, any Personal Data.

Monkey Puzzle Day Nurseries Ltd provides certain amounts of support and resources to the local Monkey Puzzle Day Nursery but it is the responsibility of the local nursery to ensure its own compliance with the Data Protection Legislation in all other cases. In this respect, the local nursery shall:

- provide the privacy notice in the form approved by Monkey Puzzle Day Nurseries Ltd to all employees, job applicants, parents, and prospective parents, that explains Monkey Puzzle Day Nurseries Ltd and the local Monkey Puzzle Day Nursery's ability and right to use their personal data, and provide evidence on demand to Monkey Puzzle Day Nurseries Ltd that such privacy notice was provided;
- comply in all respects with all Data Protection Legislation and any policies and procedures that may be published by Monkey Puzzle Day Nurseries Ltd from time to time in respect of Personal Data or pursuant to the Data Protection Legislation;
- collect and process Personal Data only so far as is necessary for the purpose of performing its obligations;
- not by any act or omission cause Monkey Puzzle Day Nurseries Ltd to be in breach of any Data Protection Legislation;
- implement and maintain (and at all times comply with) appropriate technical and organisational measures in relation to the processing of Personal Data so as to ensure a level of security in respect of Personal Data processed by it that is appropriate to the risks that are presented by the processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data;
- not engage any third party for carrying out any processing activities in respect of the Personal Data without Monkey Puzzle Day Nurseries Ltd's specific prior written consent;



- notify Monkey Puzzle Day Nurseries Ltd of all Data Subject Requests it receives within 3 days of receipt of the request and provide such information and cooperation and take such action as the Franchisor reasonably requests within the timescales required by Monkey Puzzle Day Nurseries Ltd;
 - not transfer any Personal Data outside of the European Economic Area without Monkey Puzzle Day Nurseries Ltd's prior written consent;
 - notify Monkey Puzzle Day Nurseries Ltd without delay (and in any event no later than 12 hours after becoming aware) in the event of a Personal Data Breach; and
 - provide such details of the Personal Data Breach as Monkey Puzzle Day Nurseries Ltd may reasonably require; and
 - take such steps and do all acts and things as Monkey Puzzle Day Nurseries Ltd requires in order to mitigate the effects of, and resolve, the Personal Data Breach
 - maintain complete, accurate and up to date records of all data processing activities it carries out, containing such information as Monkey Puzzle Day Nurseries Ltd may require from time to time;
 - promptly (and in any event within 5 days) provide copies of such records described above to Monkey Puzzle Day Nurseries Ltd when requested;
 - allow and contribute to, and provide reasonable access for, audits, including inspections, conducted by or on behalf of the Franchisor for the purpose of checking the local nursery's compliance with this policy and the Data Protection Legislation; and
- promptly resolve all issues or non-compliance discovered by Monkey Puzzle Day Nurseries Ltd or its agents that reveal a breach or potential breach by the local nursery of its obligations under this policy and the Data Protection Legislation.