

# **My Child at Home Privacy Policy**

*Last updated 5 May 2018*

## **ABOUT MY CHILD AT HOME**

This document sets out the personal-data privacy and protection policy for My Child at Home, a software-as-a-service operation owned by partnership 9120054515, registered in the United Kingdom at this address: 63 Gloucester Avenue, London NW1 7BA. Further information about Child at Home is available at [www.mychildathome.com](http://www.mychildathome.com) and on request (see contact details below). A web-based software system, My Child at Home processes personal data on behalf of parents and carers in the United Kingdom, some EU countries, and elsewhere. The personal data processed by My Child at Home includes information about: the system's registered users, children who are set-up in the system, those children's parents and carers, and those parents' and carers' chosen friends and family. The personal data processed by My Child at Home is derived from information that users reveal and record about themselves and their children. All personal data in the system is recorded, processed and stored exclusively for the purposes of fulfilling My Child at Home's intended purpose, which is to help parents and carers to support their children's learning.

## **ABOUT THIS DOCUMENT**

This Privacy Policy makes clear what My Child at Home commits to do in looking after individuals' personal data and what system users commit to do reciprocally. It describes what kinds of personal data My Child at Home records, processes and stores, its lawful basis for using that data, who can access which kinds of personal data in the system, how long personal data is stored, and how personal data is kept safe. Lastly, the Policy indicates how personal data may be deleted permanently.

## **MY CHILD AT HOME'S COMMITMENTS**

My Child at Home commits and agrees:

- \* To apply industry best practices in keeping personal data safe, secure and private
- \* To use personal data only for the intended purpose of supporting children's learning
- \* To retain personal data only for as long as it is needed for its intended purpose
- \* Never to use personal data to profile system users for sharing with third parties
- \* Never to sell personal data, data summaries, or data derivatives, to anyone
- \* To enable the individual subjects of personal data to correct or delete their data.

## **SYSTEM USERS' RECIPROCAL COMMITMENTS**

As a user of the system, by consenting to this Privacy Policy, you commit and agree:

- \* To use the system reasonably and responsibly for the benefit of your own children
- \* To use the information and images for child-care and educational purposes only
- \* To protect and ensure the confidentiality of the information and images displayed
- \* Never to share, upload, post, distribute or publish any of the information or images
- \* To record only what is true and accurate, and nothing that is harmful or exploitative
- \* Never to use the information or images or parts thereof in any way that is unlawful.

## **LEGALLY-COMPELLED DISCLOSURES**

My Child at Home may be compelled to surrender particular personal data to legal authorities without express consent if presented with a court subpoena or similar legal order, or as required or permitted by the laws, rules and regulations of any applicable jurisdiction. Also, in the event of a violation its agreements, including but not limited to a violation of any restrictions on the use of data provided in or through the system, My Child at Home may be compelled to disclose particular personal data to affected parties and legal authorities in furtherance of potential or on-going legal proceedings.

## **ABOUT COOKIES**

Cookies are small packets of data stored by a web browser as a result of visiting a website. (Cookies do not themselves contain personal data but some websites use them to track the website user's online behaviour.) My Child at Home uses cookies only where necessary for establishing an individual's secure access to the system, for authenticating their access rights, and for maintaining that authentication during the session. My Child at Home never employs cookies for profiling, never connects its cookies to any other website, and does not initiate or utilise third-party cookies. Any individual can inspect, delete or block cookies by selecting the appropriate control in their web browser, although blocking cookies will also block access to the My Child at Home system.

## **INDIVIDUAL CONSENT**

When individuals register to use My Child at Home, and by using it, they give active consent for the system to record, process and store their personal data and their children's personal data. Individuals who are the subject of personal data or whose children are the subject of personal data may withdraw their consent by informing My Child at Home that they wish to do so (see contact details below). However, if consent is withdrawn, My Child at Home will be unable to supply its services in relation to that individual or their children and all relevant data will be permanently deleted.

## CATEGORIES OF PERSONAL DATA

Listed here are the **categories** (and representative examples) of personal data recorded, processed and stored by My Child at Home, the types of INDIVIDUALS who are the subjects of that personal data, and the *lawful basis* for My Child at Home to have use of that personal data:

- \* **Names and contact details** for: CHILDREN, PARENTS AND CARERS, FRIENDS AND FAMILY (*LAWFUL BASIS: system operations, user communications, authorising system access*)
- \* **Personal details** of: CHILDREN (date of birth, sex); PARENTS AND CARERS (their child's early-years setting's parent website login details) (*LAWFUL BASIS: system operations, authorising system access, optionally sharing records with the child's early-years setting*)
- \* **Administrative details** about: CHILDREN (activities done, dates of activities, level of ability, user comments about activities) (*LAWFUL BASIS: system operations*)
- \* **Learning insights** about: CHILDREN (spread of activities across learning areas, current interest in particular learning areas, qualitative indication of observed peak abilities) (*LAWFUL BASIS: system operations*)
- \* **Photos** of: CHILDREN (portrait photo, activity photos) (*LAWFUL BASIS: system operations*)
- \* **System attributes** for: PARENTS AND CARERS (IP address, browser user agent, authentication cookies, login dates and times); FRIENDS AND FAMILY (IP address, browser user agent, authentication cookies, login dates and times) (*LAWFUL BASIS: system security, system user authentication, system operations and communications*).

## WHO CAN ACCESS WHICH CATEGORIES OF PERSONAL DATA

Listed here are the types of INDIVIDUAL system users and which **categories** of personal data each type of system user is given access to:

- \* CHILDREN (with the help of their parents or carers) can access **photos**: their own portrait and activity photos
- \* PARENTS AND CARERS can access: the **names and contact details, personal details, administrative details, learning insights**, and **photos** of their own children only, as well as **contact details** of their invited friends and family
- \* FRIENDS AND FAMILY can access: children's **names, personal details**, and selected **photos** and **administrative details** of children (that selection being determined by those children's parents and carers, and only if invited by those children's parents and carers)
- \* MY CHILD AT HOME STAFF can access **all categories** of personal data relating to all types of INDIVIDUALS.

## HOW PERSONAL DATA IS PROTECTED

My Child at Home utilises these and other technology security 'best practices':

- \* All application data transmitted between clients and servers is encrypted using HTTPS
- \* Data access is user-dependent (parents and carers can record, access, edit and delete all categories of data except system attributes; invited friends and family have access rights only to data selected for that purpose by parents and carers)
- \* Brute force protection is applied, where multiple login failures result in access to the servers being blocked at network level
- \* All user logins and activities are logged and archived offline
- \* Automatic logouts occur after a period of inactivity
- \* Access to file storage (e.g., photos) is restricted to the web application and is not directly accessible by the web server
- \* Database ID numbers are used to store files (e.g., photos), to anonymise data
- \* Archived data (including development copies) are stored 'pseudonymised'
- \* A GDPR-compliant, 24/7 live-managed hosting service is used for server maintenance, security patching, and disaster recovery
- \* Data privacy restrictions and GDPR-compliant data protection policies are applied to and enforced with vendors.

## HOW LONG PERSONAL DATA IS STORED

The storage of personal data about CHILDREN, PARENTS AND CARERS, and FRIENDS AND FAMILY is in the control of the parents and carers who enter it and how long it is stored by My Child at Home is determined by those parents or carers. In other words, My Child at Home stores **all categories** of personal data until the parents or carers delete it themselves or request its deletion. On request by the parent or carer who recorded personal data, My Child at Home will delete permanently all relevant data within 30 days of confirming the request. Data in a form that cannot directly be processed is stored in offline recovery backups for no more than 40 days from the date of deletion.

## INTERNATIONAL TRANSFERS OF PERSONAL DATA

Users in the United Kingdom should be aware that all personal data My Child at Home records, processes and stores is housed on servers in the United Kingdom and that no data is transferred to other countries for processing. System users outside the United Kingdom should be aware that the personal data they record is transferred to and from their home country across international borders to be processed and stored in the United Kingdom. All users should be aware that all data transfers, including those across international borders, are protected by data encryption using HTTPS.

## **CHILDREN'S PERSONAL DATA**

The main purpose of My Child at Home is to process learning data about children under the age of 13. The lawful basis for My Child at Home processing data whose subjects are under the age of 13 comprises: those children's parents or carers voluntarily registering with and using My Child at Home; and those parents' or carers' continued use of My Child at Home in order to support their children's learning. Some children under the age of 13 may participate, perhaps with adult help, in the recording and viewing of their own learning data, but no children under the age of 13 are intended as users of My Child at Home since those children would be too young to be parents or carers themselves.

## **VIEWING, CORRECTING OR DELETING DATA**

All **categories** of personal data about CHILDREN, PARENTS AND CARERS, and FRIENDS AND FAMILY may be viewed, corrected or deleted at any time by parents and carers, either within the My Child at Home system or on written request to My Child at Home (see contact details below). FRIENDS AND FAMILY may at any time request the parent or carer who entered their contact details to delete them, or may at any time request My Child at Home (see contact details below) to delete their contact details. My Child at Home reserves the right to delete any or all data for any reason and without further notice to any individual or group of individuals.

## **CONTACT DETAILS**

My Child at Home, 63 Gloucester Avenue, London NW1 7BA, United Kingdom

Neill Sanders (Data Protection Officer for My Child at Home)

Email address [help@mychildathome.com](mailto:help@mychildathome.com)