



International Creche & Preschool

## CONFIDENTIALITY POLICY

[www.careyourkids.com](http://www.careyourkids.com)

Access to certain sections of the website **www. careyourkids.com** (the “Site”) as well as any enquiries may result in the disclosure of Personal Data about you.

We may build a file containing Personal Data that you have provided to us, especially when making a request for a nursery place via our forms or during the use of certain services.

This Privacy Policy is intended to inform each user of the Site, before they disclose personal data about them, about the conditions and how the personal data they provide on this site are handled by CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A.

CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. recognizes the importance of ensuring the protection and security of privacy and personal data and has established this Privacy Policy in accordance with the strictest privacy criteria and applicable regulations.

You are aware of the collection and processing of Personal Data about you and with your consent, as a result of the acceptance of this Privacy Policy, to the creation of this file and the processing of your Personal Data, under the terms and conditions defined below.

### **1. Definitions:**

Words beginning in capital letters have the meaning provided in the glossary because of this Policy.

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## **2. Personal Data Processing:**

2.1. This Privacy Policy applies to TREATMENTS by CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. who acts as a processing manager, with personal data voluntarily provided by you on the Site.

Disclosure of this data is optional. Asterisk-marked information is required for CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. to respond to user requests as part of the Site's features.

Any information marked with an asterisk that is partial, inaccurate, or missing, makes it impossible for CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. to provide the services or services requested by the User.

However, the provision of partial or inaccurate information does not result in any consequences for the User.

The other information requested, for which the answer is optional, is intended to better know you and thus improve the services offered to you, while ensuring your security.

2.2. The information collected is the subject of a computer processing intended:  
- to process requests to register a child in a reception facility via the "contact form" and to complete the "information sheet", and to analyze the attendance of the pages of the site.

In the event that you have a place in a nursery through our network of partner nurseries, we may be required to pass on some of your Personal Data (name, first name, email, child's name, child's first name, date of birth) to the nursery manager, member of our network, welcoming your child within its structure.

In addition, when applying for a nursery place and/or during your participation in certain services made available on our website, you may, if you wish, agree to receive by email information on the CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. network and its partners.

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2.3. Users are informed that they have the option to apply online. For this purpose, they must click on the "job" link, which automatically directs them to the email [info@careyourkids.com](mailto:info@careyourkids.com), which will forward their request to the relevant services of CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A.

2.4. The table below summarizes:

- The purpose and purpose of the Treatment,
- Those affected by the treatment,
- The categories of Personal Data Processed,
- The recipients of Personal Data,
- The shelf life of Personal Data.

Object/Finality	People affected	Data Processed	Recipients of Personal Data	Time to store Personal Data
Contact request	Site user	- Name / First name - Email - Phone City	Service commercial	Contact request kept for 6 months
Analysis of the site's page attendance	Site user	Technical data: type of hardware and software used - location	Service marketing	26 months

2.5. CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. undertakes to treat Personal Data only for the purposes described above, to the exclusion of any other purpose. CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. does not market or lease Personal Data to Third Parties.

### 3. Data Protection Delegate:

CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. has appointed a data protection delegate to carry out the missions covered by Article 39 of the RGPD. The Data Protection Delegate can be contacted at: [info@careyourkids.com](mailto:info@careyourkids.com)

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#### **Technical and organizational measures:**

3.1. CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. implements appropriate technical and organizational measures to ensure the protection of personal data and match their Treatment with the necessary safeguards, in accordance with the requirements of the RGPD.

In particular, CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. takes all necessary precautions in relation to the nature of the Personal Data provided to it and the risks presented by their Treatment, in order to preserve their safety and, in particular, prevent them from being distorted, damaged, or accessed by unauthorized Third Parties.

3.2. The technical and organisational measures taken by CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. are regularly tested, analyzed, and evaluated to verify their effectiveness.

#### **4. Third-party requests:**

CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. undertakes not to disclose Personal Data to Third Parties without the permission of Users, except in the event of an administrative or judicial injunction or injunction or under a legal or regulatory requirement.

#### **5. User's rights:**

5.1. In accordance with Articles 15 to 21 of the RGPD, the User has the right:

- to obtain confirmation that Personal Data is or is not being processed and, when it is, access to such Personal Data,
- correct personal data that is inaccurate and complete it in light of the purposes of the Treatment,
- to get Personal Data erased, especially when:

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- Personal data is no longer necessary for the purposes for which it has been processed,
- Personal Data has been subject to unlawful processing,
- Personal data must be erased to meet a legal obligation,
- Limiting the Treatment of Its Personal Data, particularly where its accuracy is disputed or the Treatment is unlawful,
- to the portability of its Personal Data, i.e. the right to receive Personal Data, in a structured, commonly used and machine-readable format, in order to transmit it to another processing manager, provided that the relevant Processing of Personal Data is carried out using automated (computer) processes.

5.2. To exercise any of its rights, the User must submit a request to the Data Protection Delegate:

or by mail addressed with acknowledgement, to CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. 45/A, rue de Luxembourg L-8077 Bertrange to the Attention of the Data Protection Delegate, or by email, at: [info@careyourkids.com](mailto:info@careyourkids.com)

CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. undertakes to acknowledge receipt of any application made in this capacity by a User and to process it as soon as possible. It also undertakes to notify any recipient of the Personal Data to which it would have been communicated with the consent of the Users any correction, erasure or limitation of the Treatment, unless such communication proves impossible or requires disproportionate efforts.

5.3. In addition, Users have the right to lodge a claim with Control Authority, namely the CNPD in Luxembourg.

## 6. Confidentiality:

CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. is committed to making every member of its staff authorized to process Users' Personal Data subject to strict privacy and personal data protection obligations, including:

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- Treat only personal data strictly necessary for the realization of the purposes for which it is collected,
- That Personal Data is not treated for purposes other than those for which it was collected, except in the case of an administrative or judicial injunction or injunction or under a legal or regulatory requirement,
- Take all measures in accordance with the customs and the state of the art to avoid the misuse or fraudulent use of Personal Data and to preserve the physical and logical security of Personal Data.
- If your duties are terminated, return all data, computer files and any information support relating to Personal Data,
- Immediately and by any means inform CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. of any Violation of Personal Data of which it will be aware.

### 7. Subcontractors:

7.1. CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. undertakes to call upon Subcontractors with sufficient safeguards for the implementation of appropriate technical and organizational measures to ensure that the Personal Data Processing meets the requirements of the RGPD.

7.2. Nevertheless, no Subcontractor is involved in the Treatments of Personal Data described in Article 2.

### 8. Transfer of Personal Data:

CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. **does not transfer Personal Data to a non-EU or European Economic Area state.**

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## **9. Violation of Personal Data:**

9.1. CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. will inform every Concerned User as soon as possible of any violation of their Personal Data that could pose a high risk to their rights and freedoms, in accordance with Article 33 and 34 of the RGPD. This information describes, among other things, the likely consequences of the Violation, as well as the measures taken or envisaged by CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. to remedy the violation, including measures taken to mitigate any negative consequences.

9.2. However, the information covered in Article 10.1 above is not necessary if any of the following conditions are met:

- CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. has implemented the appropriate technical and organisational safeguards and these have been applied to the Personal Data affected by the Violation,
- CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. has taken further steps to ensure that the high risk to users' rights and freedoms is no longer likely to materialize,
- it would require disproportionate efforts.

9.3. CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. will notify the Control Authority as soon as possible and, if possible, within 72 hours of becoming aware of them, any Violation that could pose a high risk to the rights and freedoms of users.

## **10. General provisions**

10.1. In the event of a conflict between this Privacy Policy and the terms and conditions of use of an offer of CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. subsequently subscribed by the User, this Policy will prevail, in relation to the Personal Data Treatments described in Article 2.

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10.2. If any of the stipulations in this Privacy Policy were to be undone or declared unenforceable, in part or in its entirety, under existing laws and regulations, it would be excluded from this Policy without affecting the validity and applicability of all of its other stipulations.

10.3. The Privacy Policy is subject to change by CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. at any time, in particular due to technical or normative changes. If applicable, CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. undertakes to communicate the new Privacy Policy to Users.

This version was released on July 15, 2020.

**Affiliate:**

**Supervisory Authority:**

CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A.:

**Policy:**

**Privacy policy:**

**Applicable Regulations:**

**Glossary:**

Refers to any entity, Luxembourg company or foreign law- referred to by CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. or under control with it.

refers to an independent public authority established by a member state under the RGPD; in Luxembourg, the Counter Authority is the National Data Protection Commission ("CNPD").

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refers to any information provided to the User on the Site and allowing him to be identified, processed by CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. under the conditions defined by this Privacy Policy.

CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A., a limited company with a share capital of 31,000 euros, whose head office is located L-8077 Bertrange, 45/A, rue de Luxembourg registered in the Register of Commerce and Companies Luxembourg Section B number 242989 represented by its President-in-Office, Mr. Davide CASTELLANO.

This Privacy Policy is outlined.

The RGPD and any applicable regulation of a European Union Member State on the protection of personal data, including the European Convention 108, Directive 95/46/EC, the law of 15 July 1993 on the protection of persons with regard to the automated processing of personal data and the free movement of such data.

### **RGPD :**

### **Subcontractors:**

### **Third: Users:**

### **Violation of Personal Data:**

Refers to the Regulation (EU) No. 2016/679 of the European Parliament and the Council of 27 April 2016 (so-called "*General Data Protection Regulation*").

Refers to any third-party entity that handles Personal Data on behalf of CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. and/or its Affiliates.

Refers to any operation or set of operations carried out or not using automated processes and applied to Personal Data, such as collection, recording, organization, retention, use, limitation, erasure, or destruction.

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## **International Creche & Preschool**

Means any natural or legal person other than CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A., its Affiliates, and the User.

Refers to any individual visiting the Site and providing CARE YOUR KIDS INTERNATIONAL KINDERGARTEN GROUP S.A. via the Personal Data Site.

Refers to a violation of the security of the property, accidentally or unlawfully, resulting in the destruction, loss, tampering, unauthorized disclosure of Personal Data or unauthorized access to such data.