

Privacy Policy

Introduction

At MyBabysitter we are committed to safeguarding and preserving the privacy of our visitors, clients and nannies. This Privacy Notice explains what happens to any Personal Data that you provide to us, or that we collect from you whilst you visit our site and in future communications and how we use cookies on this website.

Personal Data: Any information identifying a living, identifiable individual, excluding any anonymous data but including any sensitive Personal Data. Such data can be factual such as a name, email address, date of birth or national insurance number; or an opinion or reference about a person's actions or behavior.

“Processing” or “Process”: Any activity involving the use of Personal Data whether that is obtaining, holding, recording or carrying out any operations on the data including organizing, amending, retrieving, using, disclosing, erasing or destroying it. It includes the transmission or transferring Personal Data to third parties.

Data Controller

CEO Sara Pinheiro is the data controller and is responsible for your Personal Data, including determining when, why and how to Process Personal Data. If you have any questions about this Privacy Notice you should contact sara@mybabysitter.org and we will be happy to help.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you. It is very important that the information we hold about you is accurate and up to date.

Please let us know if at any time your personal information changes by emailing us at sara@mybabysitter.org.

Background

This policy has been written in accordance with the principles and safeguards set out in the General Data Protection Regulation (EU) 2016/679 ("GDPR") We adhere to the principles relating to the Processing of Personal Data set out in GDPR which require Personal Data to be:

- Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency);
- Collected only for specified, explicit and legitimate purposes (Purpose Limitation);
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimization);
- Accurate and where necessary kept up to date (Accuracy);
- Not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation);
- Processed in a manner that ensures its security using appropriate technical and organizational measures to protect against unauthorized or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality);
- Not transferred to another country without appropriate safeguards being in place (Transfer Limitation);
- Made available to individuals such as to allow them to exercise certain rights in relation to their Personal Data (Data Subject's Rights and Requests);

How we use your Personal Data

We use the information that we collect from you to provide our services to you. In addition to this we may use the information for one or more of the following purposes:

- To provide you with information that you have requested relating to our products or services or relating to other products or services that may be of interest;



- If you have previously worked with us or employed a MyBabysitter Nanny, we may provide you with details of similar or additional services that may be of interest;
- To make our marketing campaigns more targeted and relevant to potential clients;
- To Process personal information and/or provide technical data to a third party for the purposes of profiling and understanding who visits our site. This could be analyzing data to inform our marketing strategies;
- To analyze and improve the services offered on our website. This means we can provide you with the most user-friendly navigation experience we can. This may involve providing your information to third parties for the purposes of understanding how visitors use our site and what improvements can be made to enhance their experience;
- To use your IP addresses to identify relevant information. This may include information such as your approximate location. It also helps us to block disruptive use or establish information like the number of visits to the website from different countries.

We never give your details to third parties to enable them to provide you with information regarding unrelated goods or services.

MyBabysitter will only Process your Personal Data when the law allows us to. In general, we Process your Personal Data because the Processing is necessary for the performance of an agreement we have with you, either because you are a MyBabysitter Nanny or because you are a client. In some circumstances we may need your consent to Process your data, such as for direct marketing. We will ask for your consent separately, and you can withdraw your consent at any time.

Purposes for Processing your Personal Data

Set out below is a description of the ways we intend to use your Personal Data and the legal grounds on which we will Process such data. We have also explained what our legitimate interests are where relevant. We may Process your Personal Data for more

than one lawful ground, depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of Data	Lawful basis of Processing
To register you as a new client	<ul style="list-style-type: none"> • Identity • Contact • Address • Details concerning your family 	To find a suitable candidate for your family in accordance with our legal terms and conditions
To register you as a new candidate and check you DBS	<ul style="list-style-type: none"> • Identity • Personal info • Contact • Job experience • Skills and qualifications 	To comply with our legal terms and conditions and use all reasonable endeavors to find you suitable employment/engagement
To Process your invoice <ul style="list-style-type: none"> • Manage payments • Collect and recover money owed to MyBabysitter 	<ul style="list-style-type: none"> • Identity • Contact • Financial Transaction 	<ul style="list-style-type: none"> • Performance of a contract with you. • Necessary for our legitimate interests to recover debts owed to us.
To manage our relationship with you, including notifying you about changes to our terms or privacy policy	<ul style="list-style-type: none"> • Identity • Contact • Profile • Marketing and communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with our legal obligation • Necessary for our legitimate interests to keep our records updated and to study how clients use our services
To administer and protect our business and our site (including trouble shooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interest for running our business, provision of administration and IT services, network security and to prevent fraud • Necessary to comply with a legal obligation
To use data analytics to improve our website,	<ul style="list-style-type: none"> • Technical • Usage 	Necessary for our legitimate interests to define types of clients

services, marketing, client relationships and experiences		for our services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy.
To make suggestions and recommendations to you about services that may be of interest to you	<ul style="list-style-type: none"> • Identity • Contact • Technical • Usage • Profile 	Necessary for our legitimate interests to develop our services and grow our business.

Information we obtain from other sources

In addition, we may obtain information about our candidates from other sources such as job board websites, online CV libraries, references, personal recommendations, and referees. Such information shall be held by us for the purpose of complying with our obligations to our clients and candidates. For further details on the sources from which we obtain Personal Data on candidates and the purposes for which we use it, please refer to our privacy policy.

Marketing communications

You will receive marketing communications from us if you have:

- (i) requested information from us or registered with us as a candidate or client;
- (ii) if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications.

Disclosures of your Personal Data

We may have to share your Personal Data with the parties set out below for the purposes set out in the table in paragraph 2 above:

- Clients who are looking for suitable candidates to fulfil a role that they are offering;
- Service providers who provide IT and system administration services;
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of Processing



activities in certain circumstances.

Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We will not rent or sell your personal information to other organizations for use by them in any way, including in their own direct marketing activities.

We require all third parties to whom we transfer your data to respect the security of your Personal Data and to treat it in accordance with the law. We only allow such third parties to Process your Personal Data for specified purposes and in accordance with our instructions.

Third Party Links

Our website may include links to other websites, not owned or managed by MyBabysitter. Whilst we try our best to only link to reputable websites we cannot be held responsible for the privacy of data collected by sites not managed by MyBabysitter nor can we accept responsibility or liability for those policies. For this reason, you should consult the privacy notice on any external website you link to before you submit any data to those websites.

Data security

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only Process your Personal Data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we Process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements. By law we must keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for six years after they cease being clients for tax purposes. In some circumstances you can ask us to delete your data and it is our responsibility to make sure that any Personal Data we retain is accurate. So, if you would like us to erase your data (to the extent that we are able) or there are any changes to your data which means what we currently hold is inaccurate, please let us know.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. These include the right to:

- Request access to your Personal Data;
- Request correction of your Personal Data;
- Request erasure of your Personal Data;
- Object to Processing of your Personal Data;
- Request restriction of Processing your Personal Data;
- Request transfer of your Personal Data;
- Right to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>



If you wish to exercise any of the rights set out above, please email us at info@mybabysitter.org or sara@mybabysitter.org.

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.