

Privacy Notice – Website

Nurture International is a global company specialising in a Developmentally Led, Trauma Sensitive, Nurture Approach to educational settings. Nurture International have two websites which are www.nurtureinternational.co.uk and www.digitaldevelopmentalportrait.net

Nurture International is a registered limited company who also offers charitable works. Our registered number is 12627899.

We are registered with the Information Commissioner's Office Reference: **ZB535912**

Personal Data We May Collect About You

We may collect and process personal data about you. Personal data, or personally identifiable information, means any information about an individual from which that individual can be identified. It does not include data where the identity has been removed (anonymous data). We collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** includes first name, last name, username or similar identifier, title, and gender.
- **Contact Data:** includes billing address, delivery address, email address and telephone numbers.
- **Business Data:** includes your business address and company name.
- **Financial Data:** includes bank account and payment card details.
- **Transaction Data:** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data:** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the services of Nurture International and the Digital Developmental Portrait Website and the Nurture International Website.
- **Profile Data:** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data:** includes information about how you use the Nurture International and Digital Developmental Portrait Website and Services, including the full Uniform Resource Locators (URL) clickstream to, through and from the Nurture International Website and Services (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Marketing and Communication Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

- **Location Data:** We use IP address to estimate your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the feature, you will be asked to consent to your data being used for this purpose.
- **Aggregated Data:** We also collect, use and share statistical or demographic data for any purpose. This Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

How Personal Data Is Collected

Most of the personal data we process is provided to us directly by you. We use different methods to collect data from and about you including via:

- **Direct Interactions:** You may give us your Identity, Contact and Financial Data when you fill in forms or correspond with us by post, phone, email or otherwise. This includes personal data you provide when you register to use the Nurture International website, sign up to receive our newsletter, subscribe to use our Services, create an account to use the Nurture International Website, search for a product or place an order on the Nurture International Website, participate in discussion boards or other social media functions on our Nurture International Website, enter a competition, promotion or survey, attend a conference or webinar, give us feedback or contact us and when you report a problem with the Nurture International Website or associated services
- **Purchases:** If you make purchases via the Nurture International Website or register for an event or webinar, we may require you to provide your Identity, Contact, Financial and Transaction Data.
- **Community:** If you register for an online community that we provide, we may ask you to provide us with Identity, Contact, Profile and Technical Data.
- **Automated Technologies or Interactions:** As you interact with our Services we automatically collect Technical Data about your device, browsing actions, patterns, Location Data and Usage Data. We collect this personal data by using cookies, server logs, web beacons, pixels, and similar technologies about your device, and your use of our Website and Services. We may also receive Technical Data and Location Data about you if you visit other websites using our cookies. Please see the Cookie section below for further details.

Personal Data We Receive From Other Sources

We work closely with the third parties set out in our Third Party Supplier List which including, for example, business partners, sub-contractors in technical, payment and delivery

services, advertising networks, analytics providers, search information providers, credit reference agencies and may receive the following personal data about you from them:

- **Technical Data:** from analytics providers, advertising networks and search information providers.
- **Contact, Business, Transaction and Financial Data:** from providers of technical, payment and delivery services.
- **Identity, Business and Contact Data:** from providers of chat/communication/helpdesk services with customers including via email.
- **Email Communications and Contact Data:** from providers of email communications service providers.
- **Business, Contact and Financial Data:** from CRM service providers who manage contacts and keep a record of communications/ interactions with customers.
- **Business, Contact and Financial Data:** from cloud accounting systems that store email and names of persons sent invoices by email.

Legal Basis For Processing

We will only use your personal data when the law allows us to. Most commonly we will use your personal data in the following circumstances:

- To fulfil our contractual obligations to you.
- Where it is necessary for our legitimate business interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- To comply with a legal obligation.

To the extent we process your personal data for any other purposes, we ask for your consent in advance or require that our partners obtain such consent.

How we use your personal data

Under the UK GDPR we require a lawful basis in order to process your data lawfully. We may process your personal data under more than one lawful basis depending on the specific purpose for which your data is being used.

We will not sell or rent your personal data to anyone. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

Purpose/Activity	Lawful basis
To register you as a new customer	Performance of a contract with you.
To process and deliver your order including:	<ul style="list-style-type: none">● Performance of a contract with you.● Necessary for our legitimate interests (to

<ul style="list-style-type: none"> ● Manage payments, fees and charges ● Collect and recover money owed to us 	<ul style="list-style-type: none"> ● recover debts due to us). ● To comply with our legal obligation to display your Business Data on your public booking page to enable online payments
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> ● Notifying you about changes to our terms, this Privacy Policy, the Nurture International Website, the Digital Developmental Portrait Website, or Services. <p>Asking you to leave a review or take a survey.</p>	<ul style="list-style-type: none"> a. Performance of a contract with you. b. Necessary to comply with a legal obligation. <p>Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).</p>
<p>To administer and protect our business and the Nurture International Website, the Digital Developmental Portrait Website(including troubleshooting, data analysis, testing, system maintenance, support, updates, reporting and hosting of data).</p>	<ul style="list-style-type: none"> ● Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). ● Necessary to comply with a legal obligation
<p>To use data analytics to improve the Nurture International Website, the Digital Developmental Portrait Website and Services, marketing, customer relationships and experiences.</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you.</p>	<p>Necessary for our legitimate interests (to develop our Services and grow our business).</p>

How we store your information

Depending on the Nurture International Services you use, buy, or sign up for on this website, your personal information, or the personal information of others you are working on behalf of, may be transferred, stored, or processed in other systems, by other data processors, and in other locations. If you express an interest in a product, service or campaign, ask for information on Nurture International, or apply for a job or role with the company, your personal information may also be transferred, stored or processed in other systems, by other data processors, and in other locations

We will always take all steps reasonably necessary to ensure that this data is treated securely and in accordance with this privacy notice, and in line with UK data protection regulations, including the Data Protection Act 2018 and the UK GDPR and if sub-processing involves a transfer outside of the UK we will always ensure that our data processing agreement with the sub-processor includes, as a minimum, the Standard Contractual Clauses, along with the UK International Data Transfer Addendum if available, or UK equivalents approved by the ICO.

Cookies

- We use cookies or similar tracking technology, on the Nurture International Website to distinguish you from other users. This helps us to provide you with a good experience when you browse Website and also allows us to improve our services. For more information regarding our use of cookies, please see our Cookie notice.

Your Rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. If you would like to exercise any of your rights, please contact alison@nurtureinternational.co.uk

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us via the following means:

Email: alison@nurtureinternational.co.uk

Postal Address:

Data Protection Officer
Nurture International
Barnston House,
Beacon Lane,
Heswall.
CH61 DEE

You can also complain to the ICO if you are unhappy with how we have used your data.

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

Updates or changes to this notice

We reserve the right to make changes to this Privacy Notice. Each time you visit this site you should check this notice to check that no changes have been made to any sections that are important to you. Where appropriate, any changes may be notified to you by email.

This notice was last updated in March 2024