

Privacy Policy

EYFS Yes Ltd is dedicated to protecting your privacy.

1. Definitions

- a. When we talk about “Bloomly”, “We”, “Us” or “Our” in this document, we are referring to EYFS Yes Ltd, the company which provides the Services.
- b. When we talk about “Services” or “Service” in this policy, we are referring to our online software service (known as Bloomly, or Bloomly.co.uk) which is currently available for use via web browser or mobile application.
- c. When we talk about the “User”, “Users” in this document we are referring to the organization or person that registers an account with Us to have access to the Services.
- d. When we talk about the “Customer” in this document, we are referring to the organization or other third party that created the software area for their organization or other third party. The “Customer” is in control of the “Admin Account”, which determines the existence of the Customer software area.
- e. This policy, to be read in conjunction with our Terms and Conditions (found at bloomly.co.uk), sets out the way in which any personal data that We collect from you, or that you provide to Us, will be used and processed by Us.

2. The Controller

- a. EYFS Yes Ltd (company registration 10732903)
- b. We are registered as a data controller with the ICO. Registration reference: **ZA285317**
- c. Registered office: C/O Lgm Accounting 1st Floor Enterprise House, 27-29 Market Street, Southampton, Hampshire, England, SO50 5RG

3. The Data Protection Officer

- a. Alex M P Davies - *Director and Head of Technology for EYFS Yes Ltd*

4. What information we collect

a. Customer Data

- i. Content and information that is submitted by Users to the Service is referred to as “Customer Data”. Customer Data remains under the ownership and control of the Customer at all times. Where We collect and process Customer Data, We do so on behalf of the Customer.
- ii. If you, as an individual or organisation, register to have access to the software, you are a User. If you are using the Services by invitation of a Customer, whether that Customer is your employer, another organisation, or an individual, that Customer determines its own policies regarding storage, access, modification, deletion, sharing and retention of Customer Data which may apply to your use of the Services.
- iii. Customer Data takes two forms:

Information about Users (“User Information”)

This includes information provided by you upon registration, as well as information made available at any other time whilst you are using the Service.

Information people who are not Users (“Non-User Information”)

This includes information that is submitted by Users to the Service, about other people (“Non-Users”). An example of Non-User Information is information about children, or parents of children who attend the nursery.

b. Other information

- i. Other information that we may collect about you:

Information provided when You report a problem with the Service (“Support Information”)

This includes any contact made with Us via telephone or email may be stored.

Information collected automatically from You when using our Service or website (“Automatic Information”)

This includes your MAC addresses, Internet Protocol addresses, operating systems, type of browser, the address of a referring site, and basic activity information whilst using the Service.

5. Cookies

a. What are cookies?

- i. Cookies are files sent from us to your device, and from your device to us, each time you access our website or use our Service.
- ii. Session-based cookies are stored only when your browser is open, being deleted the browser is closed.
- iii. Persistent cookies last until they expire (usually after 90 days) or until you delete them.
- iv. Cookies can always be controlled and deleted via your browser settings.
- v. We are happy to provide a full break down of what specific cookies we use, based on your usage of the Service, at your request. Please contact hello@bloomly.co.uk.

b. Why do we use cookies?

- i. We use cookies to automatically record log data when you are using our website, and the Service. We use are both session-based and persistent cookies.
- ii. We set and access our own cookies on the <https://bloomly.co.uk>, which is fully operated by Us. We also use third parties cookies, such as those created by Google Analytics for website analytics.
- iii. We use some cookies, that are associated with your account and personal information, in order to remember that you are logged in and which areas of the Service you are logged in to.
- iv. Use use other cookies that are not connected to your account, instead being unique, allowing us to record site analytics and customization, among other things.

6. How we use the information we collect

a. Customer Data

- i. We may access and use User Information within reason and as is necessary for us to provide the Service. Access and use of this information if generally for four reasons:
 - To provide and maintain the Service.

- To resolve technical or security issues, or at a Customer's request when a support issue is raised.
 - As required by law.
 - If direct permission is given by the Customer to access User Information for a specific purpose.
- ii. We will never access Non-User Information unless we have specific consent from the Customer to access this information, and unless the Customer has put in place specific policies informing Non-Users that their information may be accessed by Us.

b. Other information

- i. We use other kinds of information in providing the Services. Specifically:
- To understand and improve the Service. We monitor trends to better understand how Users are using the Service, to help us make improvements in the interests of Users. Where possible, we anonymise this information.
 - To communicate with Users by:
 - Responding to contact requests. If you contact us with a query, we will use relevant information about you and your account to respond to your query.
 - Sending emails. We often send Service, administrative, security and billing emails. These emails are understood by us to be part of the Services and therefore Users cannot opt out of them whilst still having access to the service.
 - Marketing. We may send you marketing emails about Bloomly. We do not share your contact information with 3rd parties for marketing reasons. You will only be sent marketing communications if you have opted in upon registration or at a later date. You can opt out of these at any time, and the opting-out method will be made clear in all marketing communications.
 - Preventing abuse and mis-use of the Service. From monitoring usage trends, we may contact you to inform you of mis-use relating to your account if trends suggest such mis-use has been occurring.

7. Right to be forgotten

- a. According to your rights as set out in the GDPR (effective as of 25 May 2018) we will erase all Customer Data and other information that we store about you, upon your request.

- b. If you are a Customer, and you receive a request from a non-user for the erasure of Non-User Information, we will erase this data from our systems after being fully informed of this request by you. It is the Customer's responsibility to reflect this process in their own privacy policies, and to request this erasure to us upon receiving the request from a non-user.

8. Security

- a. Security is very important to Us, and We make every effort to ensure your data is secure, to prevent mis-use, loss and unauthorised access.
- b. The data that we collect or that is inputted into the system by Users is stored within the European Economic Area (EEA), specifically in a data centre in Ireland. This data is stored entirely on secure servers provided by Amazon Web Services ("AWS").
- c. The AWS server environment that hosts the Bloomly Service has certifications for its data centres, including ISO 9001:2008 and ISO 27001:2013 compliance, PCIDSS v3 Certification, and SOC reports.
- d. For more information about AWS certification and compliance, please visit the [AWS Security website](#) and the [AWS Compliance website](#).
- e. We transmit information from the browser to our secure servers using Secure Sockets Layer (SSL) software which is a protocol of encrypting the information you input.
- f. All company devices are protected with VeraCrypt encryption software.

9. Children's information

- a. Our Services are not directed to children under 13. If you learn that a child under 13 has provided us with personal information without consent, please contact us.
- b. Non-User Information, submitted by Users, may contain information about children. This data remains under ownership of the Customer at all times, and it is the duty of the Customer to inform guardians that this data is being held by us, as a 3rd party.
- c. We will never access information about Children unless we have specific consent from the Customer to access this information, and unless the Customer has put in place specific policies informing guardians that children's information may be accessed by Us.