# **Privacy Policy for Vasa Neon Preschool**

**General**

Vasa Neon preschool is run by the Parental Cooperative Vasa Neon Economic Association and is located in Johanneberg, Gothenburg. In our preschool we need to process personal data in various situations concerning the children enrolled, their guardians, our employees, employees of suppliers, employees of authorities and other persons who come into contact with our preschool.

The preschool care about the personal integrity of those persons whose data we process and comply with all relevant legislation, such as the European General Data Protection Regulation ("GDPR"), Swedish supporting legislation in the privacy field and other relevant legislation, such as the Swedish Education Act (Sw. *"Skollagen*"). In this policy we want to describe the processing of personal data in our activities in order for you to feel safe with how we handle personal data.

**What data is covered by our privacy policy?**

Our privacy policy covers all personal data we collect or data which are submitted to us, whether electronic (by email, the website, text messages, etc.) or otherwise (for example, through conversations or on paper).

**How do we collect personal data?**

Our collection of personal data can be divided into three categories

* Details you provide yourself in contacts with us
* Information we collect in connection with the child's time at the preschool
* Information from other sources, such as Gothenburg Municipality

**When do we process your personal data?**

We follow the principle of not collecting or processing more information than we need for our operations and we terminate the processing of personal data and delete the data when it is no longer needed.

*Child, guardian and other relatives*

Vasa Neon preschool handles personal data for children and guardians in connection with the application and placement of the child at the preschool, during the time the child is enrolled in preschool and in connection to the child leaving the preschool. We may also process personal data for a period of time after the child has left the preschool.

If the child has other relatives or contact persons who come into contact with the preschool (for example, collecting or leaving the child) or are mentioned by the child or the child's relatives in connection with our activities, we may process personal data about them.

*Employees and jobseekers*

If you are a member of the staff (both permanent and temporary) or a jobseeker, we will handle your personal data for managing your employment (including salaries, sick leave, reporting to authorities, etc.), schedules and other organization, developing you as an employee and / or to process your application.

*Board*

For those guardians holding a board post, further personal data is processed than the information we process about the person as guardian. The data processed is information needed for the performance of the board work (such as invitations to meetings, attendance at meetings, handling of tasks, email correspondence with relevant contact persons based on the post of the board member, data needed by the Swedish Companies Registration Office, etc.).

*Other*

If you come in contact with us for any other matter, for example, for information about our business or our education, in a case handled by an authority or if you are a supplier, we may need to process your personal data in connection with our handling of such matter.

**What personal data do we process about you?**

*Children*

For the children who are pre-school students we collect and process information about the name, social security number, address, the child's attendance times, family conditions, eventual allergies and health information submitted through the form "Health Card". We also conduct written documentation about the child's development and situation at the preschool and matters emerging in dialogue with relatives if they can have importance for the child's stay at the preschool. Where relevant, the child's personal data will be processed when applying for special funding (so-called "supplementary allowances") and in case of incident reports. We can also get information about the family's relationship or similar information from Gothenburg municipality or other authorities.

We can take pictures of everyday situations at the preschool for the purpose of documentation or for marketing of the preschool. Guardians may, at the child's start, decide whether or not to take pictures of the child as well as to internal publishing of children's pictures. Marketing with images on children is made only after special consent to such use by the guardian.

In some cases we may process sensitive information, such as health information, regarding the child or guardian. It is entirely voluntary to provide such information as a guardian, we do not collect information from sources other than those mentioned above. Should it come to our attention that a child lives under conditions that the staff has an obligation to report to social authorities, which may include information about health, it is necessary for the staff to process such information in order to fulfil their obligations in that respect.

*Guardians and other relatives*

About you who are a guardian we process information about name, social security number, address, telephone number, email address, family conditions, employment or other activity and income. If regulatory authorities ask questions, such as the municipality, they may also provide information about the guardian to us. We may also process other data that you have chosen to provide and which are of importance for the child while at the preschool.

For relatives and other contact persons of a child, we process the name and relationship with the child as well as the contact details that the guardian chosen to give to us.

*Children placed in queue as well as their guardian*

For children and their guardians who are in queue for a placement at Vasa Neon Preschool only the following personal data will be processed (based on the information provided by the guardian in connection with the application); name, date of birth, e-mail address and telephone number of guardian, desired start date and any additional information provided in connection with the application.

*Employees*

For employees of Vasa Neon Preschool as a permanent or temporary staff, the following personal data are processed; name, social security number, address, telephone number, relative to contact in case of crisis if submitted by the employee, account number, information provided during professional development talks, health information for the purpose of administrating sick leave and other information necessary to administrate the employment and meet the preschool's obligations as an employer. We usually only collect information from you, but may also need to retrieve information from authorities to fulfil responsibilities as an employer stated in laws. We also collect an extract from the criminal record from the employee before commencing your employment with us. Furthermore, personal data are used and collected in the ongoing work to the extent necessary for providing schedules, information to the guardians about the group of staff, development of our employees and for in-house meeting documentation for meetings with the employees, etc.

*Jobseekers*

For those of you who are jobseekers, we only process the information you provided to us in connection with the application and interviews, as well as any information that may be given by the referrals you provided upon contact with them.

*Board Members*

Name, e-mail, telephone number, social security number, address and other information provided by the board member in connection with the board work.

*Suppliers and other actors*

For others, we only process name and contact details, as well as any information you have provided yourself and wish us to process for some reason.

A more detailed list of the personal data processed by the preschool is listed in the "Personal Data Sheet" (Sw. *Personuppgiftsförteckning*) which the pre-school keeps (this can be accessed on the member's part of the preschool's website for those who have access).

**Why do we process your personal data?**

*Child, guardian and other relatives*

We process personal data for the administration needed to manage the child's placement at the preschool. This includes administration of application, placement, planning, reporting according to legal requirements / demands from relevant authorities, information, individual development discussions, parental meetings, parenting activities and ongoing contacts between guardians and teachers.

We also process data within our educational activities. This may be data concerning development and fulfilment of goals according to the preschool's educational plan (Sw. "*läroplan*"). We do this as part of the documentation that we need to keep about each child due to legal requirements. We also use the documentation to follow up the pedagogical moments described in the curriculum. We also document the children's development and well-being as part of the systematic quality work we are required to perform according to the Educational Act (Sw. "*Skollagen*"). In cases where complaints or incidents occur, we process the information provided in connection with the complaint and the information we need to investigate and correct the situation that caused the complaint or incident. To support our documentation of development and goal achievement the preschool uses the Pluttra, a digital platform where guardians can follow documentation relating to the individual child as well as the entire group. Guardians have the possibility to not consent to that the child is photographed and documented in Pluttra, this is done on the form regarding photographing.

If a child or guardian have special needs, we may process personal data that concerns this need in order to ensure that the child has a safe, developing and positive time at preschool. This may involve the need for special support or educational efforts, allergies, other health problems, need for a translator, etc.

To ensure that our operations have a good standard, we continuously monitor our operations. In some cases, we may use personal data for our internal statistics and follow-up. We also need to report personal data to different authorities, such as reporting to Gothenburg Municipality about the child's time table. Different authorities, such as the child's home municipality and the Swedish National Agency for Education, are also constantly monitoring our activities through various forms of supervision and collecting information from the preschool in order to carry out their supervision.

We process personal data about other relatives or contact persons for security reasons when someone other than the guardian is to retrieve the child or for contact at the times when these persons are to be contacted, after agreement with the guardians.

We are proud of our preschool and would like more children to have the opportunity to attend our preschool. Therefore, we may sometimes want to use personal data, especially in the form of images from the daily activities, for information and marketing purposes. However, we will never do so without the written consent of the child's guardian or from the person whose personal data we wish to use. Of course, the consent can be withdrawn at any time.

The legal basis for processing of the above therefore differs and may be legal requirements, consent or balancing of interests.

*Employees and jobseekers*

We process our employees' personal data in order to: administer the employment (for example, to pay salaries and to have a contact in the event of an accident or sickness), develop the employee (for example through development talks and training) and to conduct our daily activities, such as planning schedules, provide information to the guardians about staff team, notify a supplier who will receive goods, etc.

Jobseekers data are processed with for the purpose of considering the person for an employment at the preschool.

The legal basis for processing of the above therefore differs and may be legal requirements, consent or balancing of interests.

*The board*

The purpose of this processing is to be able to efficiently and with a long-term perspective manage the business, but also to actively participate in the operation of our various areas of responsibility, such as managing staff issues, organizing parental responsibilities and responsibility for our finances.

The legal basis for processing is primarily balancing of interests, while some processing are due to legal requirements.

*Other*

We process the personal data of other categories in order to handle the issues that the preschool has together with such other person.

The legal basis for processing of the above therefore differs and may be legal requirements, consent or balancing of interests.

**Who do we share your personal data with?**

*Child, guardian and other relatives*

We provide personal data to the authorities in order to fulfil obligations we have by law, such as information to Statistics Sweden (Sw. "*Statistiska Centralbyrån"*). We also provide personal data to the child's home municipality in accordance with the rules applicable to the child's place of preschool, for example information on residence time or applications for special support. For children who are in a queue or have recently left the queue, we may submit our queue list to one of the children's home municipality upon request for them to verify that the preschool complies with the municipality's principles for placement.

We provide information about the children in the preschool to our employees as well as to third parties to the extent necessary to carry out the daily activities, such as information about allergies to guardians when they are "Friday teacher" in the preschool or currently important health information to temporary workers. We may also provide information about a certain child or guardian to the guardians who are part of the board of the preschool in cases where such information is required in order to make a decision which shall be taken by the board or a board member or to carry out an activity that is the responsibility of the board, such as planning of introduction for new children, financial follow-up of supplementary allowances, planning of parental responsibility and the like. For the avoidance of doubt, such data which are under legal secrecy duty of the teachers and other adults are not shared with the board.

It is noted that the preschool does not provide information about children to a new preschool or school. However, the preschool can provide such information to the guardian who may then pass such information on to a new preschool or school.

Following the consent of the guardians, we share personal data with the Pluttra service.

*The Association and the board*

The parental association uses children's and guardian's personal data to the extent necessary to run the association and carry out its duties, such as names and contact details for work and the like. The board's e-mails to all guardians are sent through the Mailchimp service (a platform where emails can easily be sent to a multiple of recipients), and names and e-mails of each guardian and name of their child are stored there. Mailchimp also stores data on whether e-mails have been opened and when. It is possible to change your data or end the subscription by clicking the link at the bottom of each email sent through Mailchimp.

Personal data for the guardians who hold a chair in the board are also shared with the Swedish Companies Registration Office, the municipality of Gothenburg and the like to the extent necessary to comply with laws and local regulations. Within and to the board, information on the ability of certain family / guardians payment status, employment status, information about siblings, illness and the like can also be shared with the purpose of carrying out the duties of the board.

In order to send out invoices, we also share personal data about children and guardians with the company that assists Vasa Neon in financial matters to the extent necessary to carry out invoicing and bookkeeping for the association.

Otherwise, personal data is not disclosed to third parties without written or oral consent. This may include, for example, accepting that photos from the preschool's activities including a child are used in information or marketing material.

*Employees*

We provide personal data to authorities in order to fulfil obligations we have by law, such as information to Statistics Sweden and the Social Insurance Agency, as well as to organizations we have chosen to cooperate with in order to fulfil the responsibilities we have as an employer, such as the accounting firm's terms to pay wages and Folksam to handle pension payments.

We also provide your contact details and salary to the employer organization KFO in order to administer our membership there.

In addition, we provide information about primarily the names and contact details of mainly guardians, children, suppliers and other actors for the purpose of carrying out our activities, such as giving guardians the opportunity to contact you and for discussions with suppliers and other actors.

*Other*

Other person's personal data will not be forwarded outside our organization without consent.

**How long is personal data stored?**

We follow the principle of not saving personal data longer than necessary. We will therefore only keep your personal data as long as they are needed to fulfil the purposes stated in this policy.

*Children, guardians and relatives*

For children who are enrolled, we save personal data regarding the child and their relatives during the child's time at preschool. Normally, we delete all information about the child on its last day at preschool and will save at the longest save data one year after the placement has ended, with the exception of such information as we must keep according to laws, for example for accounting purposes or ongoing incident investigations.

Children and their relatives who are registered in our queue are saved as long as the child is in queue. If you have been offered a place, the data will be saved for a maximum of one year. The data can be deleted even if you have not declined an offer if the guardian did not respond to an email about staying in the queue, which is sent out at least once a year.

*Employees and jobseekers*

For employees, we will keep personal data regarding you (and any contact details of your relatives) during your time as an employee, and then we will need to save personal data about you for some time after you finish your employment at the preschool. We will normally save data no longer than a year after termination of the employment, except for information that we must keep by law, for example for accounting purposes, ongoing incident investigations and salary details.

*Board members*

Such data we process about you in order to run the association are saved for the time they are required. Ongoing documentation is deleted when it becomes out of date. Minutes of meetings shall be saved in accordance with the Association's statutes, which we do for about ten years.

*Other*

For other persons, we process your personal data during the time we have a case or supplier / partnership relationship and delete the data within three years after such case / relationship has terminated.

**Security**

We follow the principle of not collecting and processing more information than we need for our business and to terminate the processing of personal data and delete them when they are no longer needed. We work in a way that ensures that all personal data are processed with adequate level of security, through technical and organizational security measures. Considering the type of activity we conduct, we considered it appropriate to focus primarily on organizational security measures to ensure that data is disseminated only to a minimum number of persons that need the data, and work with technical solutions with well-known IT providers in order to be able to take advantage of the latest technical security solutions without the cost being too high.

Physical documents containing personal data or other reasons are destroyed in a document shredder before they are thrown at the preschool.

There is always a risk of disclosing personal data over the Internet or by email. No technology system is completely protected from intrusion. We therefore encourage you who wish to contact us to leave sensitive personal data only in case of personal contact with the preschool. This is to ensure that any unauthorized person can access, suspend or destroy the data and to securely identify the person who leaves the data.

**What rights do you have?**

You are entitled to receive information about what personal data is being processed about you by Vasa Neon Preschool. If you are interested in this, you need to ask what information we are processing about you in writing to the preschool (for contact details, see below).

If you believe that data kept about you is incorrect or misleading or you wish to delete the information, please contact us and request a change or delete in writing.

For information where you have given written consent to our personal data processing, you can of course withdraw your consent at any time.

**Contact**

Vasa Neon preschool is data controller and therefore responsible for all processing of personal data conduced within our activities.

If you have questions about our Privacy Policy or our processing of personal data, please find us here:

Förskolan Vasa Neon

Nedstigen 510 BV

41280 Gothenburg

You are also welcome to email us at forestandare@vasaneon.se or styrelsen@vasaneon.se.