

NurseryCam Privacy Statement

Updated: April 23, 2018

NurseryCam is committed to protecting your personal information in accordance with fair information practices and applicable data protection laws and regulations. NurseryCam and any affiliated organizations that handles personal data, is responsible for ensuring compliance with the data protection requirements outlined in this statement.

The GDPR:

relates to The General Data Protection Regulations due to come into effect on 25th of May 2018.

1.0 Introduction

At NurseryCam, we value our customers and respect their privacy while using our website. The following statement as listed will assist you to how we collect, use and safeguard information that you have provided to us on the website.

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2.0 Data Protection Policy

2.1 Data Protection Officer

NurseryCam has appointed the Director of Software Architecture as the Data Protection Officer (DPO) who will ensure that all personal data is obtained and processed in a manner that complies with this statement and data protection laws.

2.2 Data Protection by Design

All IT systems, processes and applications have undergone strict assessments are reviewed in accordance with GDPR requirements. An annual data protection compliance audit will be performed to ensure an adequate level of compliance with data protection laws and GDPR.

2.3 Data Protection Principles

2.3.1 Principle 1: Lawfulness, Fairness and Transparency.

Personal Data will only be collected for one of the purposes specified in the applicable Data Protection regulation and the method of processing that will occur will be thoroughly explained to the Data Subject. By providing Personal Data, Subject consent to the use of data to fulfil the purpose of collection or as requested by Subject.

2.3.2 Principle 2: Purpose Limitation.

Personal Data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible or exceed those purposes.

2.3.3 Principle 3: Data Minimisation.

Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed and used.

2.3.4 Principle 4: Storage Limitation.

In line with Principle 3, Personal Data shall be kept for no longer than necessary for the purposes outlined to the Subject.

2.3.5 Principle 5: Accuracy.

Personal Data which needs to be stored for a defined period of time as requested must be kept accurate and up to date, thus out of date and redundant data shall not be retained unless specified by Subject.

2.3.6 Principle 6: Integrity & Confidentiality.

Personal Data shall be processed and stored in a manner that ensures appropriate security of data, including protection against unauthorised processing and accidental loss, destruction or damage.

3.0 Data Processing

3.1 What Type of Information Collected by NurseryCam?

NurseryCam is the sole owner to collect information on this website from our users. We do not provide any personally identifying information from users unless it is voluntarily provided to us from our support forms and contact us form. This form will include contact name, company name, country, email address, contact number and certain other information so that we are able to support you and provide you with the information as you have requested. You have no obligation to provide us with all this information, while without providing this information will not affect your ability to browse all functions of our website.

3.2 Where do NurseryCam store your data?

We only store data on our NurseryCam managed secured environment, your data will never be transmitted outside of the UK unless you have specially requested us to do.

3.3 How long does data is retained?

Personal data will not be retained for longer than necessary in relation to the purposes for which it was originally collected. All personal data shall be deleted as soon when the purpose of collecting is fulfilled and there is no longer a valid reason to retain.

3.4 How NurseryCam Use Any Information Collected?

When you provide your personally identifying information to us, you have been communicated that you are knowingly and voluntarily providing us the information. We will not sell or rent and share your personally identifying information to any third party outside of NurseryCam unless it is needed to fulfil your request, e.g. to fulfil an order or regarding the purpose you contacted us. When you access to this site, you consent to the transmission of your personally identifying information provided to us and to its use as described herein. The information provided may release when we believe release is appropriate to comply with law or to protect our rights.

3.5 Safeguard Information Collected / Data Security

NurseryCam is alert of your personally identifying information and take precautions to protect it. When you have provided us your sensitive information via the website, your information is protected both online and offline. This site does not store any personally identifying information online. Any of the information you have submitted to us via any forms on this website or email is being protected offline. Your personally identification information will only be used by our employees, who needed the information to perform specific job, e.g. billing or customer service. The computers and servers which we store your personally identifiable information are kept in a secure environment. A variety of security measures are implemented when a user enters, submits, or accesses their information to maintain the safety of personal information.

NurseryCam respects all the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unauthorizes or unlawful processing of personal data.

3.6 Data Subjects Accuracy

Data subjects must notify the data processor of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about the data subject is erased.

3.7 Staff

NurseryCam staff is aware of the importance of keeping personal data safe and secure. Regular brief and updates on data protection practices to ensure staff maintain data integrity.

4.0 CCTV

NurseryCam is the closed-circuit television (CCTV) and parental webcam system provider. The CCTV system and the images produced is used to detect or prevent crime and to monitor the nursery buildings and grounds to provide a safe and secure environment for nursery's children and staff, prevent loss or damage to nursery property. The system encompasses a number of fixed cameras installed at nursery's buildings. The CCTV system is owned and operated by the nursery and is monitored centrally from the nursery's office.

All operators are made aware of their responsibilities and comply with the contents of this statement and the restrictions in relation to access to, and disclosure of recorded images by publication of this statement.

The CCTV system complies under the Data Protection Act 1998. This statement outlines the use of CCTV and how it complies with the Data Protection Act 1998 and GDPR due to come into effect on 25th of May 2018.

The CCTV equipment is distributed by DVS, sourced from Hikvision. Hikvision is GDPR compliant, to find out more please visit <https://www.hikvision.com/en/Auxiliary-column/Privacy-Policy>

4.1 Statement of Intent

NurseryCam complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards trust and confidence in its continued use. The Code of Practice: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

Installation of CCTV equipment, as consented by nursery as the buyer, is for the purpose of crime detection, prevention and safeguarding of nursery's staff, children, property and grounds. Cameras are sited to capture images relevant to the purpose for which they are installed and security measures are in place to ensure privacy expectations are not violated.

4.2 Storage and Retention of CCTV images

Recorded data will not be retained for longer than necessary in relation to the purposes for which it was originally recorded. All personal data shall be deleted as soon when the purpose of collecting is fulfilled and there is no longer a valid reason to retain. CCTV playbacks and recordings are retained for evidential purpose in the event of crime happenings. All retained data will be stored securely at all times. CCTV user may request for permanent deletion of retained data as appropriate.

4.3 Access to CCTV

Access to any CCTV retained data e.g. recorded images, recordings inclusive of date time will be restricted to authorized nursery staff and our employees. There is strictly no disclosure of CCTV data to third parties other than authorized personnel e.g. Police and Service Provider to provide our rights.

5.0 Parental Webcam Service

In complementary to the CCTV system, nursery who opt to subscribe to the parental webcam service is given the option to offer their customers (parents to the children attending the nursery) this service. Parental webcam service is used for the sole purpose of viewing live images of the children strictly limited to their parents.

5.1 Data Security Protection

5.1.1 Multi-layered Security Protection

Image Encryption (1) - The NurseryCam Parental Webcam system is the ONLY nursery webcam system that encrypts every single image before it leaves your nursery. Image encryption prevents anyone from tapping onto the phone line and eavesdrop the images.

Virtual Private Network 3DES (2) - VPN is a technology that makes a secure tunnel for the transmission of data. It is usually used by large companies to transmit confidential data from one office to another. While each image is encrypted, this secure tunnel provides an extra security layer.

Secure Socket Layer 128-bit (3) - Every parent's login password and all information sent out from the NurseryCam Parental Webcam is encrypted with the military-graded 128-bit SSL protocol.

5.1.2 Secure Parent Accounts

Individual Parent Account (6) - Each parent has an individual password account. No account sharing is allowed, even between mum and dad. This enables us to closely monitor each account and catch any suspicious activity. Issuing of lost/stolen passwords will be restricted to an automated process.

Parent login history (7) - We have developed a proprietary, patent-pending login system where parents can see their last twenty logins including information on login status, location, source and network. Any suspicious activity within their account can be spotted immediately. NurseryCam is proud to have pioneered this innovative security monitoring function - one that it is not matched, even by online banking systems.

Secure Parent Account Application Process (8) - Every parent has to obtain a secret PIN from their nursery before being able to submit an application through our secure application process. The account is only activated after the application has been reviewed and approved by the nursery management. In this process, not even the nursery owner knows the parent's account password.

Automatic Log-out functions (9) - To prohibit unauthorized access to the NurseryCam Parental Webcam from an unattended computer, each account automatically stops image updates and has timed log-outs after five minutes.

5.1.3 Secure Nursery Control Panel

Full control over Parent Accounts (10) - Nursery managers have full control of all parent accounts and cameras. Only the authorized manager can approve, suspend or delete parent accounts.

Full control over Room and Time Access (11) - Your nursery will limit individual parent's viewing access to only the room(s) his/her child is in (e.g. Bear Room and garden) and the time his/her child attends the nursery (e.g. Monday and Wednesday afternoons only). Plus, you can limit the maximum viewing time per day.

5.1.4 Secure Central Server Protection

Watchdogs (4) - Watchdogs are programmed to routinely check all gateways and detect any suspicious activity or multiple failed attempts. If detected, our security staff are immediately alerted.

Firewalls (5) - Firewalls are used to prevent unauthorised internet users from accessing NurseryCam servers. Each message entering or leaving the NurseryCam servers are examined and those that do not meet our specified security criteria are automatically blocked.

24 Hours Security Monitoring (12) - Our dedicated monitoring team operates 24/7 to ensure that the highest security standard is maintained at all times. An abused account would be suspended immediately and dealt by our security personnel directly.

5.1.5 Centralised Architecture

Most hackers don't crack into the systems by brute force. Banks and military organisations are often vulnerable because their systems involve many people and multiple access points. The NurseryCam central server is built on a simple, proprietary platform where it is protected by layers of security functions which close off all possible loopholes.

5.2 Storage and Retention of Parental Webcam Images

Data and images associated with parental webcam will not be retained and shall be deleted as soon as possible, when the purpose of the data and images are fulfilled.

5.3 Access to Parental Webcam

Access to any parental webcam live view inclusive of data and images will be restricted strictly to the parents (primary and secondary parent) as registered. When you access to this site, you consent to the transmission of your personally identifying information provided to us and to its use as described herein.

6.0 Cookies

NurseryCam use browser "cookies" on this site. A cookie is a piece of data stored on a site visitor's hard drive to help us on improving your future access to our site. The cookies we use will not provide any personally identifying information about you or provide us any way to contact you, furthermore, the cookies will not extract any information from your computer. The cookies we use may identify repeat visitors to our site. As say for instance, when we use a cookie to identify you, you would not have to log in a password more than once and therefore saving time for you while accessing our site. Kindly take note that our site does not require any log-in to view it, browser cookies may still be created for non-personally-identifying visit information. Cookies may enable us to track and target the interests of our users thus enhance the experience on our site. Usage of cookie will not linked to any personally identifiable information on our site.

7.0 Google AdWords' Remarketing

NurseryCam utilize Google AdWords' remarketing to advertise advertisement trigger across the Internet. This AdWords remarketing will display relevant ads tailored to you based on parts you have viewed on NurseryCam website by placing a cookie on your machine. This cookie will not in any way to identify you or give access to your computer. The cookie is meant to "This person visited this page, so show them ads relating to that page." Google AdWords Remarketing will allow us to tailor our marketing to better suit your needs and only display ads that are relevant to you.

Visitors may opt-out of Google's use of cookies by visiting [Google's Ads Settings page](#). Alternatively, you may also opt-out of a third party vendor's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).

8.0 Breach Reporting

Any individual who suspects that a Personal Data Breach has occurred must immediately notify us at support@nurserycam.co.uk, providing a description of what occurred. Once confirmed that a Breach has occurred, the Data Protection Officer and relevant officers will follow the relevant procedure based on the criticality and quantity of Personal Data involved. We view a Breach in Personal Data as serious offense. Immediate investigation shall commence and notification email will be sent to inform on the commencement of investigation. A full report of the Breach will be generated after the investigation is completed and sent to relevant individuals and nursery for report purpose.

9.0 Updates and Enquiries

Our Privacy Statement may vary from time to time and all updates will be posted on this page if any changes made. This statement is maintained and reviewed periodically to reflect the updated privacy laws and GDPR compliance. NurseryCam's Data Protection Officer is responsible for accuracy and maintenance of this policy. If you have any questions or enquiries regarding our Privacy Policy, kindly send us an email to support@nurserycam.co.uk.