

Shining Minds Privacy Policy

a. Introduction

Shining Minds Limited is a provider of early childhood education and is a duly registered company under the Companies Act 2001. We provide services such as Pre-School, Nursery, After-School care, Saturday Activity Clubs and Holiday care.

This policy describes how personal information is collected and handled to meet the organisation's data protection standards and comply with the law.

b. Controller

Shining Minds Limited is a controller under the Data Protection Act 2017, which means that it determines the purposes and means of the processing of personal data and has decision making power with respect to the processing.

c. Data Collection

i. What data do we collect?

We collect personal information that is required to enable us to provide the above-mentioned services.

The type of personal information that we may collect include:

- Identity Information for Parents/ Responsible Party (ID, and/or Passport to capture full name)
- Child identity Information (Birth certificates to capture name and age of child)
- Child medical record
- Contact Details of Parents/Responsible Party (Proof of address such as utility bills, email address, and telephone/Mobile number)
- Occupation of Parents/Responsible Party
- Credit and Debit Card information

We may collect other information that is relevant to our functions or activities.

ii. Why are we collecting your data?

We process the above mentioned data on the basis of your consent and we only collect, hold, use and disclose personal information for purposes related to our functions or activities and most importantly to comply with the requirements of our regulators and government authorities.

d. How do we process your data?

The data collected will be used for the following:

- Child Registration purposes
- Due Diligence of Parents
- Correspondence, which may include written, telephonic and electronic communications
- Invoicing
- Adaptation of the different school programs
- Ensuring the security of the child on School premises
- To comply with the requirements of our regulators and government authorities

e. Data Disclosure

In certain circumstances, the Data Protection Act 2017 allows personal data to be shared among public sector agencies without the consent of the data subject. The above mentioned data may be disclosed to the following:

- Early Childhood Care and Education Authority
- Our Staff for the purposes of their work responsibilities

f. Data Security

Shining Minds Limited is committed to ensuring the security of personal data in order to prevent unauthorised access, accidental deletion and malicious hacking attempts. The following is put in place:

- Security measures for access to our business premises.
- The physical files are kept locked and access is restricted to unauthorised personnel.
- Soft copies of files are kept on a password protected computer.
- IT security measures such as using secure firewalls and other measures to restrict electronic access. If the data must be transferred to a third party, we require them to have in place similar measures to protect your personal data.

g. What are your rights?

You have the right to access your data, to obtain a copy of your data, to request their erasure or rectification and the right not to be subject to a purely automated decision without having your views taken into consideration. You also have the right to object to the processing, withdraw your consent and lodge a complaint with the Data Protection Office should you consider that this data processing is in violation of the law.

You may contact us at **support@shiningminds.mu** with your requests. We must answer your request within one month, but if your request is too complex or we receive too many other requests, we will inform you that this period may be extended by a further two months.

h. Links to another website

The website may contain links to other websites of interest. However, once you have used these links to leave the site, you should note that Shining Minds Limited does not have any control over that other website. Therefore, **Shining Minds Limited** cannot be responsible for the protection and privacy of any information which they provide whilst visiting such sites and such sites are not governed by this privacy statement.

i. Compliance with Data Protection Act 2017

All processing of personal data by **Shining Minds Limited** will be done in compliance with the Data Protection Act 2017.

j. Conclusion

This policy will be updated as and when required to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 2017.

Glossary of Terms:

Data Protection Act 2017: In Mauritius, the law which governs the protection of personal data is the Data Protection Act (DPA) 2017.

Controller means a person who or public body which, alone or jointly with others, determines the purposes and means of the processing of personal data and has decision making power with respect to the processing.

Data Subject (Individual) means an identified or identifiable individual, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

Personal Data means any information relating to a data subject.

Special categories of data in relation to a data subject, means personal data pertaining to:

- a) his racial or ethnic origin;
- b) his political opinion or adherence;
- c) his religious or philosophical beliefs;
- d) his membership of a trade union;
- e) his physical or mental health or condition;
- f) his sexual orientation, practices or preferences;
- g) his genetic data or biometric data uniquely identifying him;
- h) the commission or alleged commission of an offence by him;
- i) any proceedings for an offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any Court in the proceedings; or
- j) such other personal data as the Commissioner may determine to be sensitive personal data

Processing means an operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.