

# Privacy Policy & GDPR Statement

**Teddy Kids B.V.**  
Last Updated: July 2025

## 1 Introduction

At Teddy Kids, your child's care and safety come first. As part of our commitment to quality and trust, we take your privacy seriously. This document outlines how we handle personal data under the **General Data Protection Regulation (GDPR/AVG)** and other applicable Dutch laws. We aim for **maximum safety with minimal bureaucracy**, while staying fully compliant with our legal obligations.

By enrolling your child at Teddy Kids, you agree to the processing of personal data as described in this policy. We are transparent about how we collect, use, and protect your data and about what choices you do and do not have.

## 2 Who We Are

**Teddy Kids B.V.**  
Rijnsburgerweg 35  
2334 BE Leiden  
KvK: 27381036  
SBI: 8891 Kinderopvang  
Email for privacy questions: [privacy@teddykids.nl](mailto:privacy@teddykids.nl)

## 3 What Data We Collect and Why

We collect the following categories of personal data:

Type of Data	Examples	Purpose	Legal Basis
Child info	Name, date of birth, BSN, language, gender	Childcare administration, subsidy applications	Contractual necessity
Parent info	Name, phone, email, ID, home address	Contact, invoicing, safety	Contractual necessity
Emergency info	Contacts, medical info, allergies, GP	Health & safety in emergencies	Vital interest / Consent
Health data	Allergies, medications, dietary needs	Daily care, incident handling	Explicit consent

Type of Data	Examples	Purpose	Legal Basis
Biometric data	Fingerprint scan (parents/staff)	Secure access to the facility	Explicit consent
Photos/Videos	Photos taken during daily activities	Internal use and memory documentation	Legitimate interest
External media use	Photos on website/socials	Public communication	Consent
Communication logs	WhatsApp messages, emails	Operational and emergency contact	Consent / Contractual necessity
Billing info	Invoices, bank account, tax details	Financial and regulatory compliance	Legal obligation
Staff data	Work agreements, ID, fingerprint, evaluations	HR, planning, time-tracking	Contractual necessity

We do **not** collect more information than necessary. If data is not essential for the service or legally required, we don't ask for it.

## 4 Fingerprint Access Policy

Teddy Kids uses fingerprint scanning for **mandatory access** to our facilities for both **staff and parents**.

- Fingerprint data is stored securely as an encrypted mathematical template, **not as an image**, and cannot be reverse-engineered.
- This system ensures safety by strictly limiting who can enter our daycare premises.
- We do **not** offer keycards, PINs, or badges as an alternative.
- **If you do not consent to fingerprint access**, you may still drop off or pick up your child by using the **doorbell** at the entrance, where staff will assist you manually.

Your explicit written consent is required during enrollment. Refusal of consent will require use of the manual access procedure as stated above. This system is part of our operational model and is non-negotiable.

## 5 Photo and Video Policy

### 5.1 Internal Photo Use (Not Optional)

Photos and videos are **an integral part of our daycares daily rhythm**. They are used to:

- Document activities
- Celebrate milestones
- Create classroom displays

- Support social-emotional development (e.g. children seeing themselves in the group)

For privacy and logistical reasons:

- **Internal photography is not optional.**
- It is not possible to exclude your child from appearing in group photos or daily activities.
- Our staff cannot manage per-child photography exclusions. This would be operationally unfeasible and **harmful to the emotional wellbeing of children**, especially those under 4.

By enrolling at Teddy Kids, you **agree** that your child may be photographed for internal purposes (e.g. in Konnect app, group boards, printouts within the center). If this is not acceptable to you, we recommend choosing an alternative childcare provider whose policies align with your preferences.

## 5.2 External Photo Use (Optional)

We always request **separate, explicit consent** before publishing any recognizable photo or video of your child on:

- Our website
- Social media (Instagram, Facebook)
- Printed marketing materials

You have full control over external publication and may withdraw consent at any time by writing to your location manager or privacy contact.

## 6 Communication Channels

We use the following channels to communicate with parents:

Channel	Usage	Notes
Konnect app	Primary platform for updates, photos, schedule, billing	GDPR-compliant
Email (Gmail)	Documents, invoices, updates	2FA enabled, internal use only
WhatsApp (Company Devices)	Urgent messages, group updates, media sharing	Consent by joining group

Parents opting in to WhatsApp understand that:

- Their phone number may be visible to others in the group.
- WhatsApp is not end-to-end encrypted at the group level and stores limited meta-data.
- Photos/media may reside on staff devices temporarily.

If you prefer not to use WhatsApp, we will provide essential updates through Konnect and email.

## 7 Who We Share Data With

We only share personal data with **trusted service providers** necessary for our operations. These may include:

- Konnect (childcare software)
- Our payroll/accounting providers
- Hosting/email service (Google Workspace)
- Government agencies (for subsidies, inspections, health & safety)
- Fingerprint system provider (for secure facility access)

All third parties operate under a **Data Processing Agreement (DPA)** to ensure GDPR compliance. No data is shared for commercial or marketing purposes.

## 8 How Long We Keep Your Data (Retention Policy)

Data Type	Retention Period
Child records	5 years after leaving
Health data	2 years or until legal risk ends
Fingerprint data	Deleted within 1 year after last pickup
Attendance logs	7 years (tax/legal compliance)
Financial records	7 years (required by law)
Photos/videos	1 year (Konnect/WhatsApp), unless used in memory books
Emails	never
WhatsApp chats	Deleted annually or when class changes

## 9 Your Rights (Data Subjects)

As a parent or guardian, you have the right to:

- Access your or your child's personal data
- Correct inaccurate information
- Request deletion (where legally possible)
- Object to processing for specific purposes
- Withdraw consent for external photo usage or WhatsApp communication at any time

For any of these, contact us at [privacy@teddykids.nl](mailto:privacy@teddykids.nl). We aim to respond within 30 days.

## 10 Data Security

We apply reasonable technical and organizational measures, including:

- Password-protected devices and cloud systems
- Locked physical cabinets
- Two-factor authentication on email and Konnect accounts
- Encryption of fingerprint and sensitive data
- Annual deletion audits
- Staff privacy training and signed confidentiality agreements

## 11 Data Breach Procedure

In the event of a data breach:

- We act within 72 hours to contain and assess the situation
- We report serious breaches to the **Autoriteit Persoonsgegevens (Dutch Data Protection Authority)**
- Affected individuals will be informed promptly if necessary

Suspected breach? Email: [privacy@teddykids.nl](mailto:privacy@teddykids.nl)

## 12 Children's Rights and Special Considerations

Children under 16 cannot consent themselves under Dutch law. Parents or legal guardians must provide consent for all data processing. We treat child data with **heightened care**, and we avoid collecting unnecessary information (e.g. we don't track religion unless tied to dietary needs).

## 13 Annual Review & Policy Updates

This privacy policy is reviewed **annually** by Teddy Kids management and updated to reflect changes in law, services, or technology.

## 14 Final Notes

We are transparent about how we work. If you have questions or objections to any part of this policy, please speak to your location manager or contact our privacy officer directly.

If our policies do not align with your expectations, we respect your choice to seek childcare that better fits your preferences.

We are proud to serve your family and thank you for trusting us with your child's care and development.