

How Croí Childcare looks after personal information

Privacy Notice

Version	001
Date	23 October 2026
Data controller	Croi Childcare Limited, trading as Croí Childcare
Privacy contact	Sarah Jane Grange, Company Director, 086 355 0532, owner@croichildcare.ie
Next review	October 2027, and whenever our practices change

At Croí, we take the privacy of children, families and staff seriously. This notice explains, in plain language, what personal information we collect, why, who we share it with, how long we keep it and what your rights are. It applies to the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

1. Who we are

Croí Childcare is a school age childcare service, registered with Tusla's Early Years Inspectorate, which provides before school, afterschool and holiday care in 8 schools. We are the "data controller", which means we decide how and why personal information is used.

Registered provider	Croi Childcare Limited, company registration number 826564
Address	2 Kilmore Road, Artane, Dublin 5, D05 N5X2
Email	owner@croichildcare.ie info@croichildcare.ie
Data Protection Officer	We are not required to appoint a Data Protection Officer. Questions about this notice go to the contact above.

2. Whose information this covers

This notice is for children who attend Croí and their parents and guardians, emergency contacts and authorised collectors, people who enquire about or book a place or camp, and visitors to our website. Information about our staff and job applicants is covered separately in our Employee Handbook.

3. What information we collect, and where it comes from

Most of what we hold is given to us by parents when they register a child, book a place or talk to us. We also create records ourselves, for example attendance and incident records.

Type of information	Examples	Where it comes from
Child details	Name, date of birth, school and class, address, languages, any photograph	Parents, school

Type of information	Examples	Where it comes from
Parent and guardian details	Names, address, phone numbers, email, relationship to child, payment details, National Childcare Scheme information (including the CHICK)	Parents, NCS system
Emergency contacts and authorised collectors	Names, phone numbers, relationship to child, ID checked at collection	Parents
Health and wellbeing	Allergies, medical conditions, medication and consent forms, healthcare plans, GP details, dietary needs, additional needs and supports	Parents, healthcare professionals
Attendance and bookings	Booking details, sign-in and sign-out times, absences, late collections	Parents, our records
Accounts	Invoices, payments, balances, NCS claims	Parents, our systems
Incident, accident and behaviour records	Incident reports, Behaviour Reports and Charts, behaviour agreements, notes of meetings	Our staff, parents
Safeguarding information	Concerns about a child's welfare, and any reports to Tusla or An Garda Síochána. These records are kept securely and shared only on a need-to-know basis.	Our staff, others
Family arrangements	Court orders or other legal documents about custody, guardianship or access	Parents
Photographs and videos	Until you withdraw consent or your child leaves, then removed within 3 months	Our staff
Communications and complaints	Emails, messages, notes of conversations, complaints and feedback	Parents, our staff
Bookings and enquiries	Names, phone, email, the child's school and class, the sessions or camps you ask for, and any medical information you give us, such as allergies or conditions, given through our online forms (Google Forms), by email or by phone	Parents
Website	Information needed to run the website, and any message you send through it	Visitors to our website

Some of this is “special category” data, which needs extra care, such as health information and information that may reveal religion or ethnicity. We collect only what we need.

4. Why we use your information, and our legal basis

What we use it for	Legal basis (GDPR)	Examples
To provide childcare: manage bookings and attendance, care for children, and communicate with families	Contract (Article 6(1)(b))	Enrolling a child, sending reminders
To meet our legal and regulatory duties, including the Child Care Act 1991 regulations, Tusla inspection, the Children First Act 2015, and tax and accounting law	Legal obligation (Article 6(1)(c))	Attendance registers, safeguarding reports, financial records
To keep children safe and healthy in an emergency	Vital interests (Article 6(1)(d)); for health data, explicit consent (Article 9(2)(a)) or vital interests (Article 9(2)(c))	Allergy information, calling an ambulance
To administer the National Childcare Scheme	Legal obligation and public interest (Article 6(1)(c) and (e))	Claims and approvals
To give medication and manage healthcare plans	Explicit consent (Article 9(2)(a))	Medication consent forms
To charge fees, collect debts and manage accounts	Contract; legitimate interests (Article 6(1)(f))	Invoices, reminders
To handle complaints, claims and insurance, and protect legal rights	Legitimate interests; establishing or defending legal claims (Article 9(2)(f))	Investigating a complaint
To take, use and share photographs	Consent (Article 6(1)(a))	Photos in our parent group, on display or on our website
To improve our service	Legitimate interests	Feedback surveys
To take bookings and enquiries, including through online forms	Contract (Article 6(1)(b)), including steps you ask us to take before a contract. For health information given on our forms, explicit consent (Article 9(2)(a))	Booking a place or a camp
To tell current families about camps, holiday care and other services we offer	Legitimate interests (Article 6(1)(f)), with the right to opt out. Consent for anyone who is not a current family	Camp notifications
To run our website	Legitimate interests (Article 6(1)(f)): keeping the website secure and working	Only as long as needed to run the website; essential cookies expire when your browser session ends or as set by the site

Where we rely on your consent, you can withdraw it at any time by telling us. This will not affect what we did before, and may mean we can no longer provide something, for example giving medication.

5. Who we share your information with

We do not sell personal information. We share it only where needed, with:

- **The host school**, limited to what is needed for attendance, collection, safety and communication.
- **Tusla** and other regulators, for registration, inspection and child protection.
- **Pobal**, which administers the National Childcare Scheme on behalf of the Department of Children, Disability and Equality. We register children for the scheme through The Hive, Pobal's online portal, and Pobal uses the information under its own privacy notice.
- **Revenue** and our accountants or payroll providers, for tax and accounts.
- **Emergency services, healthcare professionals, HSE Public Health and An Garda Síochána**, where needed to protect a child or in public health situations.
- **Our insurers and legal advisers**, where needed.
- **Service providers** who process information for us under contract. These include Eccesoft (our booking and childcare management software), Xero (our accounts package), Google (Google Workspace and Google Forms, for email, online forms and file sharing) and WhatsApp (for parent groups). They may only use it on our instructions.

We will not give information about your child to anyone else, including other parents, without a legal basis or your consent. Where it is not necessary to share personal information, we do not. We cannot share information about other children or families with you.

We do not ourselves send personal information outside the European Economic Area. Eccesoft, which holds our children's booking and attendance records, operates its own private cloud network in the Republic of Ireland. Our accounts package, Xero, hosts its service on servers in the United States and processes some information in New Zealand. The European Commission recognises New Zealand as providing adequate protection, and Xero uses European Commission standard contractual clauses for other countries. Google, which we use for email, online forms and file sharing, may process information outside the European Economic Area, including in the United States, and relies on adequacy decisions and European Commission standard contractual clauses. WhatsApp, which we use for parent groups, transfers information outside the European Economic Area, including to the United States, as part of its global operations. WhatsApp explains the safeguards it uses in its own privacy policy. We share only phone numbers and the messages we post in groups, and we do not post children's details.

We send flyers about our services to families through the host schools. The flyers do not contain personal information, and we do not ask schools for families' contact details for marketing.

6. How long we keep it

We keep information only as long as we need it for the reasons above, and then delete or destroy it securely. Our retention periods are:

Records	How long we keep them
Child registration and attendance records	Attendance registers: 6 years. Contact and health details: deleted within 1 year after the child leaves
Accident and incident records	Until the child turns 21 (employees' accident records: 10 years)
Medication and healthcare records	Until the child turns 21. Healthcare plans are deleted within 1 year after the child leaves
Safeguarding and child protection records	Until the child concerned turns 25, or for longer if we are advised to keep them

Records	How long we keep them
Complaints records	At least 2 years after the complaint has been dealt with
Collection arrangements and authorised collector forms	2 years after the child leaves
Financial and accounts records	At least 6 years from the end of the financial year they relate to
Photographs	Until you withdraw consent or your child leaves, then removed within 3 months
Fire and safety records	6 years
Enquiries from families who do not take up a place	12 months
Booking and enquiry form responses (Google Forms)	Deleted from Google once the details are in the child's record

7. How we keep it safe

- Paper records are kept locked, and only staff who need them can reach them.
- Electronic records are protected by passwords and access controls, and devices are password-protected.
- Online booking responses are stored in a Google Workspace business account protected by two-factor authentication. Because some forms ask for health information, access to the responses is limited to named staff, what we need is moved into the child's record, and the responses are then deleted from Google.
- Staff are trained in data protection and confidentiality, and sign to confirm they understand.
- Children do not use our devices, and phones and devices are not used by children at Croí.
- We do not use CCTV at any of our services.
- If personal information is ever lost or shared by mistake, we investigate straight away, tell the Data Protection Commission within 72 hours where required, and tell the people affected where there is a high risk to them.

8. Giving us information, and other sources

- **Do you have to give us information?** To register a child and keep them safe, we need certain information, such as contact details, emergency contacts, authorised collectors and health information. The law also requires us to keep some records. If you do not give us what we need, we may not be able to offer or keep a place. Other information, such as photograph consent, is optional.
- **Where else we get information.** Mostly from you, but sometimes from the host school, the National Childcare Scheme system, a child's healthcare professional or Tusla.
- **Automated decisions.** We do not make decisions about you or your child using automated processing or profiling.

9. Your rights

Under data protection law, you have the right to:

- **be told** how we use your information, which is the purpose of this notice;
- **see** the personal information we hold about you or your child, and get a copy (a subject access request);
- **have it corrected** if it is wrong or incomplete;
- **have it deleted** in certain circumstances, for example if we no longer need it. We may need to keep some records by law;
- **restrict** how we use it in certain circumstances;
- **object** to our use of it where we rely on legitimate interests;
- **move** some information to another provider (data portability); and
- **withdraw consent** at any time, where we rely on consent.

To use any of these rights, contact us at owner@croichildcare.ie. We may need to check your identity. We will respond within one month, which can be extended in some cases, and will tell you if so. There is normally no charge. Parents and guardians exercise these rights on behalf of younger children. As children get older, we take their views into account.

10. Photographs, videos and our parent group

- We take photographs and videos of children only on Croí devices, and only if a parent has given consent on the registration form. We never use personal devices.
- Photographs may be used on display at the service, in our parent groups for notices and occasional updates, and on our website or social media. We do not name children in public photographs.
- We use WhatsApp to set up parent groups for notices and updates. Joining is optional. Members of a group can see each other's names and phone numbers, so please do not share other members' details. Please do not post photographs or information about other people's children. We do not discuss individual children in groups; we will contact you directly instead. You can leave a group at any time, and we will also use email if you prefer.
- You can withdraw or change your consent at any time by telling us in writing, and we will stop using the photograph from then on, and remove it where we can.

11. Our website, online forms and cookies

- **Online forms.** We take booking and enquiry details through online forms hosted by Google. Some of our forms ask for health information, such as allergies and medical conditions, so that we can keep your child safe, and we ask you to confirm that you agree to us using it. Each form links to this notice. Please only enter what the form asks for.
- **Cookies.** Our website uses only strictly necessary cookies, which the site needs in order to work and which do not need your consent. We do not use analytics, advertising or social media tracking cookies. If this changes, we will update this notice and ask for your consent first.
- **Links to other websites.** Our site may link to other sites, such as the National Childcare Scheme and Tusla. We are not responsible for how they use information, so please read their privacy notices.
- **Children.** Our website is for parents and guardians, not for children.

12. Camps, news and marketing

We send the messages you need, such as booking confirmations, closures, invoices and safety information. We also tell families about camps, holiday care and other services we offer, by email, text, WhatsApp parent groups and flyers sent home through the host schools.

- If you are a current family, we may tell you about our own similar services unless you ask us not to.

- If you are not a current family, we contact you for marketing only if you have asked us to or agreed to it.
- Every marketing email or message tells you how to stop receiving it, and we act on this promptly. You can also contact us at any time.
- We never share your details with other organisations for their own marketing.

13. Complaints about how we use your information

If you have a concern about how we handle personal information, please contact us first so we can put it right. You also have the right to complain to the Data Protection Commission:

Data Protection Commission

6 Pembroke Row, Dublin 2, D02 X963, Ireland | dataprotection.ie

14. Changes to this notice

We review this notice at least once a year and whenever our practices change. The latest version is on our website at croichildcare.ie, in the Parent and Guardian Handbook and at each service. We will tell families if we make an important change.