

CRÈCHES, FOYERS DE JOUR ET MAISONS-RELAIS

Information notice on the processing of personal data

CJF Lëtzebuerg asbl (hereinafter "CJF") applies the utmost diligence to look after the children attending its childcare centers in compliance with the applicable legislation.

In accordance with Articles 13 and 14 of the European Union General Data Protection Regulation No. 679/2016 (hereinafter the "GDPR"), data subjects are informed of the processing of their personal data as follows:

- **Purposes of data processing:**

Personal data is processed for the purposes of:

- enrolment management
- performance of the childcare services and the organization of activities, including non-formal education activities and excursions
- performance of the childcare agreement, including management of attendance, meals, billing, payment reminders and complaints
- communication with the parents or legal guardians of the child and other trusted persons authorized to pick up a child, in particular on the childcare services and development of a child
- establishment of statistics in the context of the management of its childcare centers

- **Data controller:**

CJF Lëtzebuerg asbl

A non-profit organisation

Provider of education and care services for children (SEA) accredited by the Ministry of National Education and Youth (MENJE)

2, Cubus C2- Rue Peternelchen

L-2370 Howald

Tel. 265653-1

www.cjf.lu

The service provider has appointed a Data Protection Officer (DPO) who can be reached either by email (dpo@cjf.lu) or by post or telephone (see contact details above).

- **Categories of data processed:**

- **Data relating to the parents or other legal guardian(s) of the child:** Surname, first name(s), title, postal address, telephone number(s), e-mail address(es), employment status and/or employment certificate

issued by the employer (as part of the enrolment priority given to children whose parents work), working hours, copy of ID card or passport

- **Data relating to children:** Surname, first name(s), date of birth, languages spoken (mother tongue, paternal and other languages), lifestyle habits (sleeping patterns, cuddly toys, etc.), eating habits, interests and hobbies, family situation, copy of ID card or passport
- **If applicable, health data, allergies, food intolerances:** relevant and necessary health-related data in the context of the childcare services, authorizations for the administration of medication, vaccination record, medical prescriptions, medical certificate of fitness, contact details of the attending physician
- **Data on childcare services and activities:** contractual data, attendance hours, meals, data concerning childcare services, data concerning childcare supervision and the child's development, activities and excursions, authorizations for excursions, transport authorization, data on illnesses or accidents occurring during the performance of the childcare services, photographs and films taken during the activities (subject to authorization)
- **Banking and financial data:** price of childcare services and, if applicable, rate of the applicable 'Chèque-Service Accueil' financing scheme, date of validity of the 'Chèque-Service Accueil' card, banking and invoicing data, agreement for the assignment of the family allowance
- **Data relating to trusted persons authorized to pick up the child:** surname, first name(s), title, telephone number(s), relationship with the child (family member or other), copy of ID card or passport

- **Data source:**

The data are provided by the parents or other legal guardian(s) upon enrolment of the child with a duty to keep the childcare center informed of any update. The staff of the childcare center collects and processes data concerning the child's attendance, activities and development.

- **Legal basis for data processing:**

- Performance of the childcare agreement: article 6 (1) (b) of the GDPR
- Consent of parent(s) or other legal guardian(s) for photographs and films, health-related data: articles 6 (1) (a) and 9 (2) (a) of the GDPR
- Safeguarding of vital interests of a child: article 9 (2) (c) of the GDPR
- Legitimate interests: habits, interests, hobbies, activities and development of the child, communications regarding the activities of the childcare center, statistics for the management of the childcare center: article 6 (1) (f) of the GDPR

- **Data conservation period:**

Accounting data and supporting documents shall be kept for 10 years after the end of the accounting year. Copies of photos and films will be given to parents or other legal representative(s) and will be destroyed on CJF media no later than the end of the school year in which they have been taken. The other data will be destroyed no later than 3 months after the final departure of the child from the childcare center.

- **Categories of recipients of the data:**

- Internal recipients: supervisory staff and managers of the childcare center, management of the childcare services and general management of CJF, support services (IT, accounting, secretariat).
- External recipients: manager of the billing system 'Chèque-Service Accueil' (Syndicat Intercommunal de Gestion Informatique (www.sigi.lu) acting on behalf of the MENJE), competent authorities in the context of their public service mission (e.g. SCAS, Central Social Assistance Service) and if applicable, external service providers and/or subcontractors (e.g. external photographer, lawyer).

Access to data is managed based on the principle of *"need-to-know"*.

- **Your rights:**

Every data subject has a right to information regarding the processing of personal data concerning him or her, a right which is the subject of this information notice.

Unless there is a manifestly abusive or unfounded request, each data subject has the following rights under the conditions defined by law:

- right of access,
- right to rectification in the event of incomplete or incorrect data,
- rights of opposition, erasure and/or limitation in the cases defined by the GDPR,
- where applicable, the right to the portability of data processed by automated means under contract or consent.

The consent given for the processing of personal data may be withdrawn at any time without prejudice to the lawfulness of the processing carried out before such withdrawal.

Any request for the exercise of rights can be addressed to gdpr@cif.lu.

- **Question or complaint:**

Any questions about the processing of your personal data can be addressed by e-mail to gdpr@cif.lu and/or to the Data Protection Officer (dpo@cif.lu).

If, after having contacted us, you still believe that the processing of personal data does not comply with applicable laws, you have the right to lodge a complaint with the data protection authority (www.cnpd.lu).