

HOW KINDIEDAYS MOBILE PRESCHOOL SOLUTION MEETS GDPR REQUIREMENTS

1. What is GDPR

The General Data Protection Regulation (GDPR) is a European Union regulation to strengthen personal data protection and to give control back to citizens over their personal data. It also addresses the export of personal data outside the EU. It becomes enforceable from 25 May 2018. This document describes how Kindiedays mobile solution for child care centers meets the requirements of GDPR.

2. Kindiedays solution

Kindiedays consists of mobile applications, web interfaces and cloud-based software. Kindiedays is used by Owners, Managers and Teachers/Educators in child care centers as well as by the Carers/Families of the Children. Personal data to be protected consists of information about the Children and the Carers. This data is used only in Kindiedays and is not used by 3rd party services or public services like Facebook, WhatsApp, Instagram, Twitter etc. Export of data manually by copying on the phone, taking screen shots or exporting of reports by the Manager or Teacher, can, however, not be protected and is on the responsibility of the person taking this manual action. Equally managing temporary caching of data in Internet, such as in browsers, is on the responsibility of the users.

3. Technical architecture, sub processors and security

Kindiedays is a secure and closed environment operated currently on the **Amazon AWS platform in Ireland**. Personal data is stored in a MySQL database on the AWS platform. All communication between the user devices/apps and the backend is protected with SSL certificates. A list of security measures currently employed by the service provider is available at <https://aws.amazon.com/security/>.

The following GDPR compliant external technologies are used to enhance Kindiedays functionality and usability:

- Kindiedays messaging service is implemented within the AWS platform. To improve the messaging user experience, Kindiedays also uses Firebase/Messaging for sending **push notifications** to the Apps, but the notifications are just alerts about received message and don't include any personal data content <https://firebase.google.com/products/cloud-messaging>
- Kindiedays uses Cloudinary media optimizer SaaS service <https://cloudinary.com/> to **make pictures load faster**. We use Cloudinary servers located within EU to store and optimize pictures. When a user fetches a picture, this picture is temporarily cached in an edge server close to the user to secure fast delivery of subsequent searches. Cloudinary security policy can be found here <https://cloudinary.com/privacy#section10>)
- Kindiedays development organization uses Firebase/Crashlytics analytics SaaS service provided by Google <https://firebase.google.com/> for **monitoring and resolving purely technical issues**. In case of malfunctions in an App, Firebase Crashlytics collects purely technical non-personal data to enable efficient problem solving. Firebase privacy policy can be found here <https://firebase.google.com/support/privacy> .

Further, Century Moose as the provider of the solution has employed its own security measures in accordance with applicable industry practice for similar-stage companies. Teacher groups and individual Carers are registered with their Kindiedays accounts. Access to personal data is behind user/user group specific login and passwords. Teacher's accounts are also personalized with a PIN code. The accounts are established directly in the Kindiedays platform and we don't accept sign in with social media accounts.

Kindiedays high level architecture and 3rd party solutions are shown in Appendix 1.

4. GDPR Definitions and their meaning in Kindiedays

GDPR TERM	MEANING IN KINDIEDAYS
Data Controller - the entity that determines the purposes, conditions and means of the processing of personal data	The child care center is the Data Controller and is also responsible for compliance with the GDPR
Data Processor - the entity that processes data on behalf of the Data Controller.	Century Moose as the provider of the Kindiedays solution is the Data Processor.
Data Subject - a natural person whose personal data is processed by a controller or processor	Data Subjects are the Children and the Carers .
Personal Data - any information related to a natural person or 'Data Subject', that can be used to directly or indirectly identify the person	Personal Data is the data about Children and Carers stored in Kindiedays such as names, e-mail, phone numbers, etc. (See Table 1)
Consent - freely given, specific, informed and explicit consent by statement or action signifying agreement to the processing of their personal data	Carers must give their explicit consent for their own and their children's personal data
Right to Access - entitles the Data Subject to have access to and information about the personal data that a controller has concerning them	Carer's right to access their own and their children's personal data
Data Erasure - also known as the Right to be Forgotten, it entitles the data subject to have the data controller erase his/her personal data, cease further dissemination of the data, and potentially have third parties cease processing of the data	Carer's right to erase their own and their children's personal data
Data Portability - the requirement for controllers to provide the data subject with a copy of his or her data in a format for use with another controller	Carer's right to get copy of their children's data to transfer to another service provider

5. Personal Data

Personal Data is the data about Children and Carers stored in Kindiedays such as names, e-mail, phone numbers, allergies etc. Child care center's Owners, Managers, Teachers/Educators and Carers/Families enter and modify personal data through several interfaces: Owner Web App, Manager Web App, Educator Mobile App, Family Mobile App and Families Web App. All personal data and the respective interfaces and processing capabilities are shown in the enclosed in Appendix 2 Table 1.

New Children are always added by the Manager and the following data entries are defined as mandatory: Group for the child, Child's Full Name, Nickname, Carer's E-mail address, Name, Mobile phone number and Relation to Child. These are used to uniquely identify the Child. However, if protection of real identity is required, it is possible to enter fictional characters e.g., "X" or "O" for the Child's Full name, Carer's Name and Mobile phone number. All other data is optional.

6. Carer's Explicit Consent

Carers must give explicit consent for their own and Children's personal data. Consent is given in two ways:

1. For personal data entered or modified by the Manager or Educator, the child care center must ask for a written consent or agreement from the Carer. Certain personal data that uniquely identifies the child, must not get corrupted and this data can only be entered and modified by the Manager i.e. Child's nick name and Carer's e-mail.

2. For personal data entered or modified by the Carer using the Family Mobile App or Family Web App, consent is considered given when data is entered. Part of this information can also be entered by the Manager. If this is the case, the Carer's consent is required as in point 1 above. Carers must give their explicit consent for allowing the Child's face picture to be shown in pictures distributed to other children.

7. Carer's Right to Access Data

Carer has access right to all personal data for himself and the Child in his custody. The only exception is the attendance statistics, which is only available to the Manager, as well as the full photo album with pictures of all children, which are only available to the Manager and Teacher/Educator.

8. Carer's Right to Data Erasure

The Manager can delete the Child and the Carer from the solution. This deletes all personal data about the Child and Carer respectively. The only track that remains is possible pictures in the album of all children.

9. Carer's right to Data Portability

The Carer can save data from the Family Mobile App to the mobile phone for further processing with external applications. The Owner/Manager/Teacher can export Child's learnings (Portfolio/Journal, Daily Report, Album) as commonly used word or excel files with the help of the Manager/Teacher Web App and provide these to the Carer.

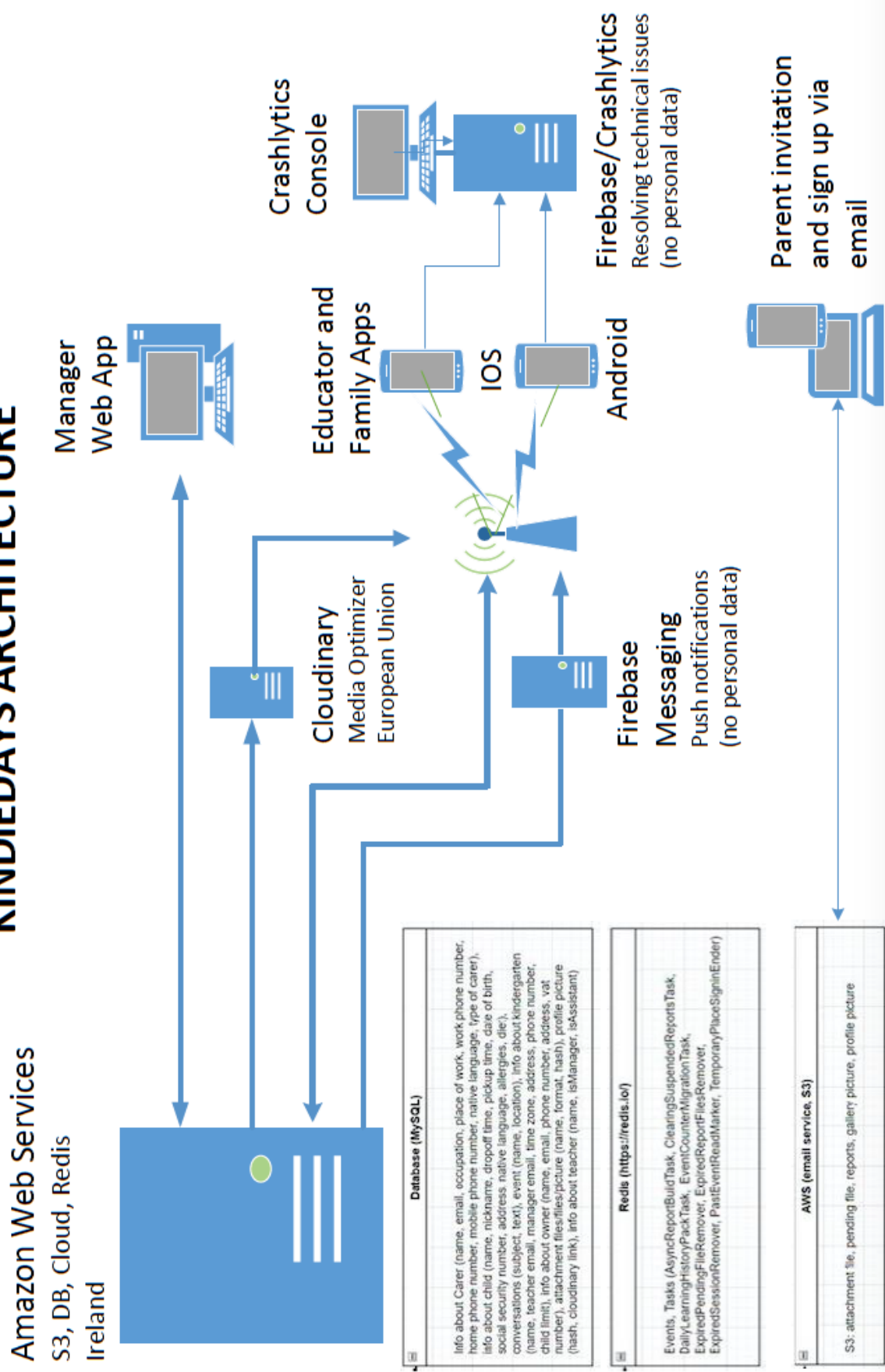
10. Summary and required actions

The key actions for the childcare centers are:

1. Keep tight control of the personnel's access rights based on the roles and needs.
2. Secure consent from the Carer to handle the data. A sample form is enclosed in Appendix 3.

Appendix 1

KINDIEDAYS ARCHITECTURE



Appendix 2

DATA	DATA ACCESSIBLE THROUGH WEB APPS AND MOBILE APPS (IOS, ANDROID)				GDPR RELEVANCE FOR PERSONAL DATA OF CARER OR CHILD
	OWNER WEB APP	MANAGER WEB APP	EDUCATOR APP	FAMILY APP, FAMILY WE APP	
WORKPLACE RELATED DATA					
Owner					
Owner e-mail and password	X				Work related, not relevant
Center/Manager					
Manager e-mail and password	X	X			Work related, not relevant
Address, phone, opening hours etc.	X				Work related, not relevant
Educator App username and password	X	X			Work related, not relevant
Teacher					
Teacher profile picture		X			Work related, not relevant
Teacher name and PIN		X			Work related, not relevant
CARER PERSONAL DATA					
E-mail address		X	R	R	Unique identifier; Created and modified by Manager
Carer relation		X	R	R	Created and modified by Manager
Read only right		X			Created and modified by Manager
Default conversation party		X			Created and modified by Manager
Pickup permission		X	R	R	Created and modified by Manager
Password to Family App				X	Created and modified by Carer
Name		X	R	R	Created by Manager
Occupation (optional)		X	R	X	Managed by Carer (or Manager)
Place of work (optional)		X		X	Managed by Carer (or Manager)
Work phone no. (optional)		X		X	Managed by Carer (or Manager)
Home phone no. (optional)		X	R	X	Managed by Carer (or Manager)
Mobile phone no.		X		X	Managed by Carer (or Manager)
Native language (optional)		X		X	Managed by Carer (or Manager)
Enable e-mail messaging		X		X	Enabled or disabled by Manager
CHILD PERSONAL DATA					
Full Name		X	R	R	Created and modified by Manager
Nickname		X	R	R	Unique identifier; Created and modified by Manager
Group		X	X		Managed by Manager or Educator (only temporary)
Photo consent		X	R	X	Managed by Carer (or Manager)
Dropoff time (optional)		X		X	Managed by Carer (or Manager)
Pickup time (optional)		X		X	Managed by Carer (or Manager)
Date of birth (optional)		X		X	Managed by Carer (or Manager)
Social security number		X	R	X	Managed by Carer (or Manager)
Street address (optional)		X		X	Managed by Carer (or Manager)
Zip Code (optional)		X		X	Managed by Carer (or Manager)
City (optional)		X		X	Managed by Carer (or Manager)
Native language (optional)		X	R	X	Managed by Carer (or Manager)
Allergies (optional)		X	R	X	Managed by Carer (or Manager)
Diet (optional)		X	R	X	Managed by Carer (or Manager)
DATA CREATED DAILY					
Messages		X	X	X	Messages created by Manager, Educator or Carer
Journal per child			X	R	Content created by Educator per child
Daily Report per child			X	R	Content created by Educator per child
Photo album per child			X	R	Content created by Educator per child
Learning reports per child			X	R	Content created by Educator per child
All pictures		R	X		Content created by Educator per child
All learning reports		R	X		Content created by Educator per child
All attendance times		R	X		Content created by Educator per child

LEGEND:

X = Read and write (modify)

R = Read only



= Data created and modified by Carer or Manager. Educator can read.

= Data created and modified by Manager. Educator and Carer can read.

= Content created by Educator per child. Carer can read, not modify.

= Content created by Educator. Manager can read Album or Attendance reports. Not accessible by Carer.

Table 1 Kindiedays personal data, users and user rights

SAMPLE FORM:

NAME OF KINDERGARTEN _____**Kindiedays personal data consent form**

MANDATORY DATA	FORMAT AND EXAMPLE	PERSONAL DATA OF CARER OR CHILD
CARER PERSONAL DATA		
Carer e-mail	Enter: john.smith@mycompany.com	
Carer relation	Select: Mother, Father, Babysitter, Relative, Other	
Name	Enter: John Smith, can be fictional e.g. XXX	
Mobile phone number (*)	Enter: +123 4567 890, can be fictional e.g. 000	
CHILD PERSONAL DATA		
Full Name	Enter Peter Smith, can be fictional e.g. YYY	
Nickname	Enter: Pete	
Child's learning and care data collected by the center's Manager or Educator in the daily work with the children as defined in Kindiedays GDPR policy, Table 1		

*) Can be changed later by Carer in Family App. For all other data the Carer must ask the Manager to make the change

I herewith give my consent that the Manager or Educator of the kindergarten registers the above data for me and my child to be used in the Kindiedays mobile child care solution for the purposes of managing the learning process and daily care of the child as well as the communication with the parents

Place and date

Signature:

Name in block letters: