

## Minor To Major: General Data Protection Regulation (GDPR) Policy

*The General Data Protection Regulation (GDPR) is a new law that replaces the Data Protection Act (DPA) 1998. It comes into effect on 25 May 2018.*

*It extends the provisions of the existing DPA by placing greater obligations on how organisations handle personal data and gives individuals more control over how their data is stored and used.*

### Awareness

*Minor To Major* are aware of the changes to UK data protection laws and therefore appoint company director Mr Will Peters to oversee data privacy compliance and manage data protection risk for the organisation.

### Information Held

- *Minor To Major* holds personal information about our staff, the children that attend our projects, their parents, and any individuals subscribed to our newsletters.
- All personal information is stored for internal company use only
- *Minor To Major* guarantee that there is no occasion where this information will be passed on to any third party company other than through data processing
- All information collected will be either digital via our website ([minortomajormusic.co.uk](http://minortomajormusic.co.uk)), or on paper at one of our projects
- *Minor To Major* endeavours to ensure that our use of information is clear and easy to understand

### Personal Details Collected

- When subscribing to our newsletter, *Minor To Major* collects the following personal information:
  - Person's name
  - Contact email address
- When booking onto a project, *Minor To Major* collects the following personal information:
  - Name of Parent
  - Contact address
  - Contact email address
  - Contact number
  - Name of Child
  - Date of Birth of Child
- When attending a project, *Minor To Major* collects the following personal information:
  - Name of Child
  - Date of Birth of Child
  - Address
  - Emergency contact name
  - Emergency contact number
  - 2<sup>nd</sup> emergency contact name
  - 2<sup>nd</sup> emergency contact number
  - Medical/Dietary needs

## Why is information held

*Minor To Major* collect such Non-personal and Personal Information for the following purposes:

- To provide and operate our services
- To ensure the safety and security of the children in our care
- To be able to contact our subscribers and parents with general or personalised service-related notices and promotional messages
- To create aggregated statistical data and other aggregated and/or inferred non-personal information, which we may use to provide and improve our respective services
- To comply with any applicable laws and regulations.

## Information Storage

- *Minor To Major* is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our products and services to you. Data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store data on secure servers behind a firewall.
- Direct payment gateways are offered by PayPal and adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.
- Medical information is collected in paper form at the time of our projects. These documents are kept in sealed and locked portable containers for the duration of the relevant projects. Once completed, the documents are transferred to a locked storage cupboard at the address of the company director.
- All other digital data the company holds or creates (i.e. attendance registers) containing personal information, is kept on external hard drives that are password encrypted.

## Individual Rights

*Minor To Major* recognises the GDPR rights of an individual and therefore puts in place the following measures:

- Every individual has:
  - the right to be informed;
  - the right of access;
  - the right to rectification;
  - the right to erasure;
  - the right to restrict processing;
  - the right to data portability;
  - the right to object;
  - the right not to be subject to automated decision-making including profiling
- Any individual wishing to access their personal information will not be restricted or charged and information will be made available within one month of the request being made. Access will only be denied if there is a conflict with our Child Protection and Safeguarding policy where the safety of every child remains the priority.
- Any individual wishing to have their information deleted will not be restricted or charged and information deletion will be fulfilled within one month of the request being

made. Access will only be denied if there is a conflict with our Child Protection and Safeguarding policy where the safety of every child remains the priority.

- Any individual wishing to have their information rectified will not be restricted or charged and information changes will be fulfilled within one month of the request being made. Access will only be denied if there is a conflict with our Child Protection and Safeguarding policy where the safety of every child remains the priority.

### **Information Deletion**

- *Minor To Major* recognises that personal data should not be held for any longer than is necessary. Therefore, *Minor To Major* will hold data from individuals who have attended our projects for up to three years after their last date of attendance. The only exception to this is if an incident has been reported that is graded as 'moderate' or 'severe', in which case, data will be held for five years from the date of the incident.
- *Minor To Major* reserves the right to keep any photos or media from participants even after the three year period for the use of marketing and digital media. These can be removed at the individual's request.
- Any physical information will be destroyed using a cross-cut shredder ensuring that no data can be restored
- Digital information will be removed as best as possible ensuring that at the very least the information is 'beyond use'.

### **Consent**

*Minor To Major* recognises that each individual must provide consent to their information being processed with an explanation as to what it will be used for. This will be ensured by:

- Providing opt-in boxes on all information collection forms
- Providing clear details of how information will be used

### **Data Breaches**

- *Minor To Major* recognises its duty to report certain types of data breach to the ICO, and in some cases, to individuals.
- The ICO will be notified of a breach if it is likely to result in a risk to the rights and freedoms of individuals – for example, it could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage.
- Serious breaches are to be reported within 72 hours.
- Employees are trained to understand what constitutes a personal data breach and how it can be avoided
- Employees are aware of a need to report any mistakes to the DPO or the person or team responsible for data protection compliance, as this is the most common cause of a data breach.

This policy will come into effect from 1<sup>st</sup> September 2023

This policy will be reviewed annually from 1<sup>st</sup> August 2024