



PATHWAYPIXEL

GAMING WITH PURPOSE. EMPOWERING NEURODIVERSE JOURNEYS

PathWayPixel Data Retention Policy

1. Purpose

The purpose of this **Data Retention Policy** is to provide clear guidelines on how **PathWayPixel** handles the retention, storage, and disposal of personal data in compliance with **GDPR** and other relevant privacy regulations. This policy ensures that personal data is not kept for longer than necessary and is stored securely.

2. Scope

This policy applies to all types of personal data collected and processed by **PathWayPixel** for the purposes of providing online mentorship and gaming services. This includes, but is not limited to, client contact details, session reports, session recordings, consent forms, and communication logs.

3. Data Retention Principles

Data Minimization: Personal data will only be collected and stored for specific purposes related to the services provided and in compliance with the informed consent of clients and their guardians.

Limited Retention Period: Personal data will only be retained for as long as necessary to fulfill the purposes for which it was collected. After this period, data will be securely deleted or anonymized.

Secure Storage: All personal data will be stored securely, either digitally on encrypted systems or in physical records, with access restricted to authorized personnel only.

Data Disposal: Data that is no longer required will be securely disposed of, either by permanent deletion or anonymization, to prevent unauthorized access or misuse.

4. Retention Periods

The retention period for different types of personal data varies depending on their purpose and legal or regulatory requirements. The following outlines the general retention periods for various types of data:

Client Personal Information (e.g., contact details, consent forms):

- o Retained for the duration of the client's engagement with **PathWayPixel** and up to 1 year after the last interaction.
- o This allows for client re-engagement and also accounts for the possibility of administrative actions.

Session Reports (Progress reports, behavioral reports):

- o Retained for up to **1 year** after the session or after the end of the client's program.
- o These reports are used to track client progress and improvements, but should not be retained longer than necessary.

Voice/Screen Recordings (Game session recordings for training/monitoring):

- o Retained for **up to 30 days** from the date of the recording.
- o After 30 days, recordings will be permanently deleted unless they are specifically required for legal or safeguarding reasons.

Consent Forms and Contracts (Data consent forms, agreements):

- o Retained for **up to 6 years** after the last session or until the client's legal right to withdraw consent expires (whichever is later), to comply with legal and regulatory requirements related to contract law.

Financial Data (Invoices, payment details):

- o Retained for **up to 6 years** for accounting and tax purposes as required by UK law.
- o After 6 years, this data will be securely deleted.

Email and Communication Logs:

- o Retained for **up to 1 year** unless otherwise specified by the client or required for legal, financial, or safeguarding purposes.
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5. Data Storage and Security

Digital Storage: All client data will be stored in secure, encrypted digital systems. For example, reports and consent forms will be stored in **Google Workspace** or other secure, GDPR-compliant systems, and Discord will be used for communication and session management, adhering to **GDPR** regulations.

Access Control: Access to client data is restricted to authorized personnel only. Staff and volunteers will be granted access based on the "need to know" principle and will be required to sign non-disclosure agreements to protect the confidentiality of the data.

Physical Storage: In cases where physical records need to be maintained, they will be kept in a locked, secure location and accessed only by authorized personnel.

6. Data Deletion

Once personal data is no longer required for its intended purpose or after the expiration of the relevant retention period, it will be securely deleted or anonymized to prevent unauthorized access.

Digital Data: Digital files will be deleted from all systems, and any backups containing the data will also be purged or anonymized.

Physical Data: Paper-based records will be shredded or destroyed in a manner that ensures the information cannot be recovered.

Continue onto the next page

7. Retention Schedule Summary

Type of Data	Retention Period	Notes
Client Personal Information	Retained during engagement + 1 year	For re-engagement or administrative purposes
Session Reports	Retained for up to 1 year after the last session	Client progress tracking
Voice/Screen Recordings	Retained for up to 30 days	For training/monitoring purposes
Consent Forms and Contracts	Retained for up to 6 years after last session	Legal requirements for contracts
Financial Data	Retained for up to 6 years	Required by law for tax and accounting
Email and Communication Logs	Retained for up to 1 year	Communications related to the client's program

8. Data Retention Review and Updates

This **Data Retention Policy** will be reviewed annually to ensure compliance with **GDPR** and to reflect any changes in business practices, data retention requirements, or legislation. If significant changes to the retention periods or data storage practices occur, clients will be notified, and consent will be updated accordingly.

9. Client Rights

Clients and their guardians have the following rights regarding their personal data:

- **Right to Access:** Clients can request a copy of their personal data held by **PathWayPixel** at any time.
- **Right to Rectification:** Clients can request corrections or updates to their personal data if it is inaccurate or incomplete.
- **Right to Erasure:** Clients can request that their personal data be deleted once it is no longer necessary for the purposes it was collected.
- **Right to Restrict Processing:** Clients can request that processing of their data be restricted, particularly where the accuracy of the data is contested or if they object to its processing.

Requests for data access, correction, or deletion should be submitted to the **Data Protection Officer (DPO)** at kane@pathwaypixel.co.uk

10. Contact Information

For any queries related to this **Data Retention Policy** or to exercise your data protection rights, please contact:

Data Protection Officer (DPO):

Kane Woodhouse

kane@pathwaypixel.co.uk

07483242833

Acknowledgment:

I, the undersigned, acknowledge that I have read and understood the **PathWayPixel Data Retention Policy**.

Client Name/Guardian: _____

Signature (Client or Guardian): _____

Date: _____