



PATHWAYPIXEL

GAMING WITH PURPOSE. EMPOWERING NEURODIVERSE JOURNEYS

PathWayPixel GDPR and Data Protection Policy

Introduction

PathWayPixel is committed to protecting the privacy and personal data of our clients, their families, and our team members. This policy outlines how we collect, store, and use personal data in compliance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Key Principles of Data Protection

We adhere to the following GDPR principles:

1. **Lawfulness, Fairness, and Transparency:**
Personal data is processed lawfully, fairly, and transparently.
 2. **Purpose Limitation:**
Data is collected for specified, explicit, and legitimate purposes and not processed for unrelated purposes.
 3. **Data Minimization:**
We only collect data that is necessary for the intended purpose.
 4. **Accuracy:**
Personal data is accurate and kept up to date.
 5. **Storage Limitation:**
Data is retained only for as long as necessary.
 6. **Integrity and Confidentiality:**
Data is processed securely to protect against unauthorized access, loss, or damage.
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What Data We Collect

We collect and process the following personal data:

- **Client Information:**
Name, age, contact details, and relevant health or neurodiversity information provided by parents/guardians.

- **Parent/Guardian Information:**
Name, contact details, and consent forms.
 - **Session Data:**
Voice and screen recordings (with consent), progress reports, and activity logs.
 - **Website Data:**
IP addresses, cookies, and other data collected via our website, as applicable.
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How We Use Personal Data

Data is used for the following purposes:

1. **Service Delivery:**
 - o Facilitating gaming and mentoring sessions.
 - o Tracking and reporting progress.
 2. **Safety and Safeguarding:**
 - o Ensuring client safety during online interactions.
 3. **Communication:**
 - o Updating parents/guardians on client progress or any issues.
 4. **Compliance:**
 - o Meeting legal, safeguarding, and EHCP funding requirements.
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How We Store and Protect Data

1. **Storage Locations:**
 - o Reports, recordings, and client data are securely stored on Google Workspace, which is GDPR-compliant.
 - o Discord is used for communication but not for storing sensitive data.
2. **Security Measures:**
 - o Password-protected accounts.
 - o Encryption for stored data.
 - o Access restricted to authorized personnel only.
3. **Retention Periods:**
 - o Client data: Retained for the duration of services plus 6 months, unless otherwise required.
 - o Session recordings: Retained for a maximum of 3 months unless required for safeguarding or legal purposes.

Sharing Data

We will not share personal data with third parties except in the following circumstances:

- With explicit consent from the client or their guardian.
- When required by law or safeguarding obligations.

Data Subject Rights

Under GDPR, individuals have the following rights regarding their data:

1. **Right to Access:**
Request a copy of their personal data.
2. **Right to Rectification:**
Correct any inaccuracies in their data.
3. **Right to Erasure** ("Right to Be Forgotten"):
Request deletion of data, subject to legal or safeguarding requirements.
4. **Right to Restrict Processing:**
Limit how their data is processed.
5. **Right to Data Portability:**
Receive a copy of their data in a structured format.
6. **Right to Object:**
Object to data processing under certain conditions.

Consent and Transparency

- **Parental/Guardian Consent:**
Consent forms are required for collecting and processing data, including session recordings and game-related activities.
- **Transparency:**
We provide clear information about how data is used and stored in our Privacy Policy and consent forms.

Breach Management

In the event of a data breach, we will:

1. Notify affected individuals within 72 hours if there is a risk to their rights or freedoms.
2. Report the breach to the Information Commissioner's Office (ICO) if necessary.
3. Take corrective actions to prevent future breaches.

Contact Information

For questions or concerns about data protection, please contact:

PathWayPixel Data Protection Officer

kane@pathwaypixel.co.uk

Policy Review

This policy will be reviewed annually or whenever there are significant changes to data protection regulations or our practices.