



# PATHWAYPIXEL

GAMING WITH PURPOSE. EMPOWERING NEURODIVERSE JOURNEYS

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## PathWayPixel Confidentiality Policy

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### Introduction

At **PathWayPixel**, we are committed to maintaining the confidentiality and privacy of all personal and sensitive information shared with us by clients, their families, and any other parties involved in our services. This policy outlines how we handle, store, and share personal information and sets the standard for confidentiality in all our operations, including during online gaming sessions, mentorship, and communication with clients.

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### Scope

This Confidentiality Policy applies to all team members, contractors, and anyone who may come into contact with personal information about clients, both in the course of providing services and in day-to-day business activities.

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### Confidential Information

Confidential information refers to any personal, sensitive, or private data that is shared with us or collected during the provision of services. This includes, but is not limited to:

- **Client Personal Information:** Name, address, date of birth, contact information, medical history, and any other identifying data.
- **Session Information:** Details of the sessions provided, including progress reports, feedback, and session outcomes.
- **Communication Records:** Any messages exchanged between clients, their families, and our team members, including through Discord, emails, or other forms of communication.
- **Payment Information:** Financial details related to payments made for services, including payment history.

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## Responsibilities

- **PathWayPixel Team:** All team members are responsible for maintaining the confidentiality of client information. This includes ensuring that all data is securely stored, that discussions regarding clients take place only in secure, authorized settings, and that client information is never shared without explicit consent.
- **Clients and Families:** We ask clients and their families to maintain the confidentiality of any personal information or details shared during the sessions and not to share private information about other clients in the community.

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## How We Handle Confidential Information

- **Collection:** We collect only the necessary personal data required for providing our services (e.g., contact information, session details, and any specific support needs).
- **Storage:** All confidential data will be stored securely. We use encrypted cloud storage systems (such as Google Workspace) for storing session reports, client information, and other sensitive data. Physical records, if any, are securely locked and only accessible by authorized personnel.
- **Access Control:** Access to confidential information is limited to authorized personnel only. Each team member is required to sign a confidentiality agreement.
- **Sharing Information:** We will never share a client's personal information without explicit, written consent unless required by law (e.g., safeguarding concerns or a legal request).
  - **Consent:** Before sharing any personal information with third parties (e.g., reporting to local authorities, healthcare professionals), we will obtain written consent from the client or their parent/guardian if underage.

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## Confidentiality in Communication

- **During Sessions:** All communication that takes place during online gaming sessions, including voice, video, and text, will remain confidential. If any third parties are present in the session, we will inform the client beforehand and request their consent.
- **Session Recording:** If sessions are recorded for safety, training, or feedback purposes, the client will be notified in advance and required to consent. All recordings will be stored securely and only accessed by authorized staff. Recordings will not be shared with anyone outside the PathWayPixel team without explicit consent unless required for legal purposes.

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## GDPR Compliance

As a business operating in the UK and providing services to clients, we are committed to complying with the **General Data Protection Regulation (GDPR)** and the **Data Protection Act 2018**.

- **Data Minimization:** We collect and process only the minimum amount of data necessary to provide our services.
- **Data Subject Rights:** Clients or their guardians have the right to:

- o Access their personal data held by PathWayPixel.
    - o Request correction or deletion of their personal data.
    - o Withdraw consent at any time for the processing of their data.
  - **Data Retention:** Client data will be kept only for as long as necessary to provide services and comply with legal obligations. Once no longer required, data will be securely deleted.
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## Exceptions to Confidentiality

There are a few exceptional situations in which confidentiality may need to be broken:

1. **Safeguarding:** If there is a concern for the safety or well-being of a client or others (e.g., risk of harm or abuse), we are legally required to report this information to the relevant authorities, including social services or law enforcement.
  2. **Legal Compliance:** If we receive a legal request (e.g., a court order), we may be required to disclose information.
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## Confidentiality Breach

In the event of a confidentiality breach (e.g., accidental disclosure of personal information):

- **Reporting:** The breach should be reported immediately to the business owner or designated privacy officer.
  - **Investigation:** A formal investigation will be conducted to determine the cause of the breach and prevent future occurrences.
  - **Remediation:** If a breach involves a client's personal information, we will notify the affected client and provide them with steps they can take to protect themselves.
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## Training and Awareness

While formal certification in confidentiality practices is not required, we are committed to ensuring that all team members are made aware of the importance of maintaining confidentiality, following data protection rules, and handling personal information securely.

- **Internal Awareness:** Team members will be provided with internal training and guidelines on confidentiality practices, how to store and handle client information securely, and when to report safeguarding concerns.
  - **Policy Acknowledgement:** All team members will be required to read and acknowledge the **Confidentiality Policy** to ensure they understand their responsibilities.
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## Policy Review and Updates

This policy will be reviewed annually or when there are significant changes in data protection laws, business practices, or operational procedures. Updates to this policy will be communicated to clients and team members.

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**Date of Policy Implementation:** 12/10/24

**Last Review Date:** 12/10/24

**Next Review Date:** 12/10/25

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## **Contact Information**

If you have any questions or concerns about how your information is handled, please contact us at:

**Email:** [kane@pathwaypixel.co.uk](mailto:kane@pathwaypixel.co.uk)

**Phone:** 07483242833