



## Data Protection and Privacy Policy

### 1. Purpose and Scope

**Purpose:** The Data Protection and Privacy Policy ensures the safeguarding of personal information belonging to children, parents, and staff associated with Kids Kinetic. The policy aims to comply with all applicable data protection laws and regulations, thereby ensuring the privacy and security of personal data.

**Scope:** This policy applies to all personal data processed by Kids Kinetic, including but not limited to information on children, parents, and staff. It covers data collected, stored, processed, and transmitted through any medium, including digital and physical formats. All employees, volunteers, and contractors of Kids Kinetic are required to adhere to this policy.

### 2. Definitions

- 2.1 Personal Data:** Any information relating to an identified or identifiable natural person ('data subject'). This includes names, identification numbers, location data, online identifiers, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- 2.2 Processing:** Any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation, or alteration.
- 2.3 Data Controller:** The entity that determines the purposes and means of processing personal data.
- 2.4 Data Processor:** The entity that processes personal data on behalf of the data controller.

### 3. Data Collection

- 3.1 Lawful Basis for Collection:** Personal data shall be collected and processed on a lawful basis. This includes obtaining explicit consent from the data subjects, processing necessary for the performance of a contract, compliance with a legal obligation, protection of vital interests, performance of a task carried out in the public interest, or legitimate interests pursued by the data controller.
- 3.2 Minimisation:** Only the minimum amount of personal data necessary for the specific purpose shall be collected.
- 3.3 Transparency:** Data subjects shall be informed about the data being collected, the purpose of collection, how it will be used, and their rights regarding their data.

## **4. Data Storage and Security**

- 4.1 Data Storage:** Personal data shall be stored securely using appropriate technical and organisational measures to prevent unauthorised access, loss, or destruction.
- 4.2 Encryption:** Sensitive personal data shall be encrypted both in transit and at rest.
- 4.3 Access Control:** Access to personal data shall be restricted to authorised personnel only, based on the need-to-know principle.
- 4.4 Regular Audits:** Regular audits shall be conducted to ensure compliance with data protection policies and procedures.

## **5. Data Access and Sharing**

- 5.1 Access Requests:** Data subjects have the right to request access to their personal data. Kids Kinetic shall respond to such requests in a timely manner, in accordance with applicable laws.
- 5.2 Data Sharing:** Personal data shall not be shared with third parties without the explicit consent of the data subject, except where required by law or necessary for the provision of services.

## **6. Data Retention and Disposal**

- 6.1 Retention Period:** Personal data shall be retained only for as long as necessary to fulfil the purposes for which it was collected, or as required by law.
- 6.2 Data Disposal:** Personal data that is no longer needed shall be disposed of securely, using methods such as shredding, degaussing, or secure deletion.

## **7. Data Breach Response**

- 7.1 Incident Reporting:** Any suspected or actual data breach shall be reported immediately to the Data Protection Officer (DPO).
- 7.2 Investigation:** The DPO shall conduct a prompt and thorough investigation of the breach.
- 7.3 Notification:** If a data breach is likely to result in a high risk to the rights and freedoms of individuals, the affected data subjects and relevant authorities shall be notified without undue delay.

## **8. Training and Awareness**

- 8.1 Staff Training:** All staff members, volunteers, and contractors shall receive regular training on data protection and privacy policies and procedures.
- 8.2 Awareness Programs:** Ongoing awareness programs shall be conducted to ensure that all personnel are aware of their responsibilities regarding data protection.

## **9. Roles and Responsibilities**

**9.1 Data Protection Officer (DPO):** The DPO is responsible for overseeing data protection strategy and implementation to ensure compliance with data protection laws.

**9.2 All Staff:** All staff members, volunteers, and contractors are responsible for adhering to this policy and protecting personal data within their control.

## **10. Review and Amendments**

This policy shall be reviewed annually and amended as necessary to ensure ongoing compliance with data protection laws and best practices.

**Reviewed: July 2024**