COMPREHENSIVE DATA PROTECTION & PRIVACY POLICY

Business Name: Paperbirds Art

Data Controller: Barbara Roessler

Contact Email: contact@paperbirds-london.co.uk

Date of Policy: January 2026

1. Purpose and Scope of this Policy

This policy sets out how I, as a sole trader operating Paperbirds Art, collect, process, protect, and retain personal data. As a provider of children's art classes, I act as the Data Controller under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy applies to all personal data collected directly from parents or guardians, data processed via third-party systems, and any physical documentation generated during business operations. I am fully committed to protecting the privacy of the families I serve and ensuring all data handling is lawful, fair, and transparent.

2. Core Data Protection Principles

I pledge to uphold the seven core principles of the UK GDPR. All data processed by my business will be:

- Lawful, fair, and transparent: Collected with clear communication and a valid legal basis.
- Purpose limited: Only used for the specific reasons it was originally gathered.
- Data minimised: Restrictive to only what is strictly necessary to run the classes safely.
- Accurate: Kept up-to-date, with old or incorrect entries corrected or erased promptly.
- Storage limited: Never kept for longer than legally or operationally required.
- Secure: Protected against unauthorised access, accidental loss, damage, or destruction.
- Accountable: Maintained with visible proof of compliance, including active ICO registration.

3. Comprehensive Breakdown of Data Collected

To provide safe, professional art instruction and maintain commercial records, I collect and process the following categories of data:

A. Standard Personal Data

Parent/Guardian Identity: Full name, billing address, personal email address, and primary telephone number.

Child Identity: Full name, date of birth, and gender (where required to group age-appropriate classes).

Emergency Contacts: Names and direct contact numbers of authorised alternative contacts.

B. Special Category Data (Sensitive Information)

Health and Medical Data: Details of severe allergies, medical conditions, medications, or Special Educational Needs (SEN). This is strictly required to ensure a safe learning environment, manage risks around art materials (e.g., specific glues or paint ingredients), and provide appropriate physical or instructional support.

C. Digital and Media Data

Visual Imagery: Photographic images or video recordings of children's artwork, or class sessions.

Technical Data: Opt-in records, time stamps, and email interactions captured via subscription forms.

4. Lawful Bases for Processing Data

Under the UK GDPR, I must have a valid legal reason to process data. I rely on the following bases:

Contractual Necessity: I process parent contact information, child names, and payment details to fulfil my contract to deliver the art classes you have booked and paid for.

Legal Obligation: I process and retain financial transaction records to meet statutory tax obligations with HM Revenue and Customs (HMRC).

Consent: I rely on opt-in consent to send marketing newsletters via ClassForKids. Consent can be withdrawn at any time.

Vital Interests / Legal Safeguarding: In extreme emergencies, I may share medical or contact details with first responders to protect a child's life.

5. Detailed Data Storage and Information Security

I operate a strict security protocol across all physical and digital touchpoints to safeguard information:

Device Security: All digital devices used to access client data (including my primary computer, tablet, and smartphone) are protected by strong alphanumeric passwords and biometric locks (fingerprint/facial recognition).

Software Security: I rely entirely on established, GDPR-compliant third-party cloud applications—specifically ClassForKids for booking infrastructure and Mailchimp for email distribution. Access to these accounts requires unique logins and Two-Factor Authentication (2FA) wherever available.

Physical Documentation: While I aim to operate paperless, temporary paper documents (such as daily registration sheets or emergency contact clips) are kept under my direct supervision during class. Once a class concludes, any paper containing personal details is immediately destroyed.

6. Strict Data Retention Schedule

Data is never held indefinitely. I follow a strict retention matrix to ensure compliance with both data laws and insurance regulations:

Data Type	Retention Period	Reason for Retention
Active Enrolment Data	Duration of the child's attendance.	To manage ongoing classes and communications.
Financial Invoices & Receipts	6 years following the end of the current tax year.	Statutory requirement under UK HMRC tax law.
Medical, Accident & Injury Logs	Until the child reaches the age of 21 (or 3 years post-incident).	Compliance with public liability insurance terms.
Marketing Lists	Until the recipient unsubscribes or requests deletion.	Right to erasure / consent-based processing.

7. Photography, Videography, and Social Media

I love celebrating the creativity of my students, but child privacy is paramount. I enforce the following rules regarding imagery:

- No Photography of the children's face
- Separated Marketing Consent: Parents are given an explicit choice upon booking to opt-in or opt-out of photography. Choosing not to participate will never affect a child's ability to attend classes.
- Focus on Artwork: We prioritise photographing the artwork itself or taking "over-the-shoulder" shots where children's faces are not visible.
- No Identifying Names: I will never publish a child's full name alongside their artwork online or on social media channels.

8. Third-Party Data Sharing

I do not sell, lease, trade, or share personal information with outside commercial entities for marketing purposes. Data sharing is strictly confined to:

- Authorised Software Processors: Cloud tools essential to operating the business (ClassForKids, Mailchimp, and my business banking/accounting platform).
- Emergency Services: Disclosing medical or contact details to doctors, paramedics, or hospitals if a child falls seriously ill during an art session.

9. Your Statutory Rights Under UK GDPR

Parents and guardians retain complete ownership over their data. You have the right to exercise the following statutory controls:

- The Right of Access: You can request a complete copy of all personal data I hold regarding you or your child at any time. This will be provided free of charge within one calendar month.
- The Right to Rectification: You can request that I immediately update or correct any inaccurate or incomplete records.
- The Right to Erasure ("Right to be Forgotten"): You can request the permanent deletion of your data, provided it does not conflict with my overarching legal obligations (such as HMRC tax records or insurance-mandated accident logs).
- The Right to Restrict Processing: You can ask me to pause processing your data while a dispute or accuracy check is being resolved.

- The Right to Withdraw Consent: For all consent-based activities (marketing, photography), you can withdraw your permission instantly by clicking "unsubscribe" or emailing me directly.

10. Questions or Complaints

If you have any questions regarding this policy, wish to update your details, or want to exercise your legal rights, please contact me directly at contact@paperbirds-london.co.uk.

If you believe I have handled your data unlawfully, you have the right to lodge a formal complaint with the UK's independent data regulator:

- Information Commissioner's Office (ICO)
- Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Website: www.ico.org.uk