



# Data Protection Policy (GDPR Compliance): Unscripted

## 1. Our Commitment to Data Protection

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At Unscripted, we're dedicated to protecting the **privacy and personal data** of our students, their parents/guardians, our staff, and other individuals we interact with. This policy outlines how we handle personal data, ensuring full compliance with the **General Data Protection Regulation (GDPR)** (Regulation (EU) 2016/679) and Ireland's Data Protection Act 2018. We believe strong data protection is key to maintaining trust and providing a secure environment for everyone involved with Unscripted.

## 2. Who This Policy Applies To

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This policy applies to **all personal data** processed by Unscripted, whether it's stored digitally (e.g., on computers, cloud servers), on paper, or any other medium. It covers all staff, contractors, volunteers, and anyone acting on behalf of Unscripted.

## 3. Our Data Protection Principles

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We adhere to the core principles of GDPR when handling personal data:

- **Lawfulness, Fairness, and Transparency:** We process data legally, fairly, and openly.
- **Purpose Limitation:** We collect data only for specific, clear, and legitimate purposes. We don't use it for anything else.
- **Data Minimisation:** We only collect and hold the data that's absolutely necessary for our purposes.
- **Accuracy:** We keep personal data accurate and up-to-date. If it's wrong, we fix it immediately.
- **Storage Limitation:** We don't keep personal data longer than needed for its original purpose.
- **Integrity and Confidentiality (Security):** We keep personal data secure, protecting it from unauthorized access, loss, or damage using appropriate measures.

## 4. Types of Personal Data We Collect

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Unscripted may collect and process various types of personal data, including:

- **For Students:** Name, date of birth, address, contact details (phone, email), emergency contact information (parent/guardian names, phone numbers), medical information (allergies, pre-existing conditions) relevant to their safety and participation, photographs/videos for promotional purposes (with consent), attendance records, progress notes, and payment information.
- **For Parents/Guardians:** Name, address, contact details (phone, email), and payment information.
- **For Staff:** Name, address, contact details, date of birth, PPSN, bank details for payroll, employment history, qualifications, Garda vetting information, and emergency contact details.

## 5. Why We Process Your Data (Lawful Basis)

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We only process personal data when we have a valid reason, known as a 'lawful basis' under GDPR. These reasons include:

- **Consent:** When you give us clear permission for a specific use (e.g., using photos/videos).
- **Contractual Necessity:** When we need to process data to fulfill an agreement with you (e.g., student enrollment, employment contracts).
- **Legal Obligation:** When we're legally required to process data (e.g., child protection duties, tax compliance).
- **Legitimate Interests:** When we process data for our legitimate operational interests (e.g., internal administration, ensuring safety), provided your rights and freedoms aren't overridden.

## 6. Your Data Protection Rights

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You have important rights regarding your personal data:

- **Right to be Informed:** To know how your data is being used.
- **Right of Access:** To request a copy of your personal data.
- **Right to Rectification:** To have inaccurate data corrected.
- **Right to Erasure (Right to be Forgotten):** To request that your data be deleted in certain circumstances.
- **Right to Restriction of Processing:** To limit how your data is used.

- **Right to Data Portability:** To obtain and reuse your data for your own purposes across different services.
- **Right to Object:** To certain types of processing (e.g., direct marketing).
- **Rights in Relation to Automated Decision Making and Profiling:** Not to be subject to decisions based solely on automated processing.

To exercise any of these rights, please contact Unscripted Director in writing. We'll respond within one month.

## 7. How We Secure Your Data

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Unscripted uses appropriate technical and organizational measures to protect your personal data. These include:

- **Physical Security:** Securing our premises, locking filing cabinets, and restricting access to data storage areas.
- **IT Security:** Using password protection, firewalls, anti-virus software, and encrypting devices where appropriate.
- **Access Control:** Limiting access to personal data only to staff who need it for their duties.
- **Staff Training:** Ensuring all staff understand their data protection responsibilities.
- **Data Minimisation:** Only collecting and keeping necessary data.
- **Secure Disposal:** Safely disposing of both paper and electronic data when it's no longer needed.

## 8. Data Breaches

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In the unfortunate event of a personal data breach (e.g., accidental loss, unauthorized access), Unscripted will:

- Assess the severity and potential risk to individuals.
- Notify the **Data Protection Commission (DPC)** within 72 hours if required by law.
- Notify affected individuals without undue delay if there's a high risk to their rights.
- Take immediate steps to reduce the impact and prevent future breaches.

## 9. How Long We Keep Your Data

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We only keep personal data for as long as necessary for the purpose it was collected, or as required by law. Our data retention periods are based on legal requirements, regulatory guidance, and business needs.

## 10. Sharing Data with Others

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We may share personal data with third parties only when it's necessary for Unscripted's operations and with strict safeguards in place. This might include:

- Payment processors.
- IT support providers.
- Government bodies (e.g., Tusla, Gardaí) when legally required.

Any third party processing data on our behalf will do so under a **data processing agreement** that ensures GDPR compliance.

## 11. International Data Transfers

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Unscripted primarily processes data within the European Economic Area (EEA). If data ever needs to be transferred outside the EEA, we'll implement appropriate safeguards (like Standard Contractual Clauses) to ensure your data remains protected.

## 12. Policy Review

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Unscripted Director will review this Data Protection Policy annually, or sooner if there are significant changes to data protection laws, our operations, or following a data breach.