

# DATA PROTECTION & PRIVACY POLICY FOR KITCHEN JAM



Last reviewed 20/09/2025

## 1. PURPOSE

This policy establishes Kitchen Jam's commitment to protecting the privacy and security of personal data. We handle personal information in a lawful and transparent manner, complying with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

## 2. SCOPE

This policy applies to all staff, students, and parents/guardians associated with Kitchen Jam. It governs how we collect, store, process, and share personal data, ensuring security in both physical and digital forms.

## 3. POLICY STATEMENT

Kitchen Jam is committed to:

- Collecting and processing personal data lawfully, fairly, and transparently.
- Ensuring data is only used for its intended purpose, securely stored, and appropriately disposed of.
- Allowing individuals to exercise their data rights, including access, correction, and deletion.

## 4. TYPES OF PERSONAL DATA COLLECTED

- **Student Data:** Name, contact details, date of birth, attendance, academic records.
- **Staff Data:** Employment history, performance evaluations, and professional qualifications.
- **Billing Data:** Payment records and invoicing information for tuition fees.

## 5. DATA COLLECTION AND USE

- **Purpose:** Data is collected only for educational, operational, and billing purposes.
- **Lawful Basis:** Data processing is based on consent, contract necessity, or legal obligation.
- **Data Usage:** Personal data supports lesson scheduling, student progress tracking, and communications.

## 6. DATA STORAGE AND SECURITY

- **Physical Security:** Documents containing personal data are kept in locked, secure areas.
- **Digital Security:** Electronic data is protected by encryption, firewalls, and secure password protocols.
- **Data Retention:** Personal data is retained only as necessary for operational, legal, or regulatory reasons and securely deleted thereafter.

## 7. DATA SHARING

- **Internal Access:** Data access is restricted to authorised staff members on a need-to-know basis.
- **Third-Party Compliance:** Data may be shared with third parties (e.g., payment providers) only when necessary, with contractual assurances for data protection.
- **Parental Communication:** Student data may be shared with parents or guardians for safeguarding or educational reasons.

## 8. RIGHTS OF DATA SUBJECTS

- **Right to Access:** Individuals may request access to their personal data and expect a response within one month.
- **Right to Rectification:** Individuals can request correction of incorrect or incomplete data.
- **Right to Erasure:** Data will be deleted upon request if no longer necessary, barring any legal obligations.
- **Right to Restrict Processing:** Data subjects may restrict processing in specific circumstances, particularly if accuracy is contested.

## 9. REPORTING DATA BREACHES

- **Internal Reporting:** In the event of a suspected data breach, staff must notify the Data Protection Officer immediately.
- **Response and Notification:** Breaches will be assessed, documented, and, if necessary, reported to the Information Commissioner's Office (ICO) within 72 hours, as required by GDPR.

## 10. TRAINING AND AWARENESS

- **Staff Training:** All staff are trained on data protection practices, including GDPR principles and secure data handling.
- **Ongoing Awareness:** Staff receive periodic updates on data protection policies and emerging security practices.

## 11. MONITORING AND REVIEW

- **Annual Policy Review:** This policy is reviewed annually to remain compliant with legal changes and best practices.
- **Feedback Mechanism:** Staff and stakeholders are encouraged to provide feedback on data protection practices for continuous improvement.

## 12. CONTACT INFORMATION

For any data protection queries, contact:

- **Data Protection Officer:** Darryl Powis
- **Email:** [darryl@kitchenjam.com](mailto:darryl@kitchenjam.com)
- **Office Address:** Kitchen Jam, 8-10 Penny Brookes Street, E20 1BN