

Gamity – Data Protection, GDPR & Record Keeping Policy

Organisation Name: Gamity CIC

Policy Owner: Designated Data Protection Lead

Applies To: Directors, Staff, Volunteers, Contractors

Last Reviewed: 03/03/2026

Next Review Date: 03/09/2026

1. Policy Statement

Gamity is committed to protecting the personal data of children, young people, parents/carers, staff, volunteers, partners, and supporters and their right to privacy. We ensure that all personal information is handled lawfully, fairly and transparently. This policy sets out our approach to ensuring we comply with data protection laws, taking into account requirements of GDPR and DPA.

As a Community Interest Company operating in the United Kingdom, Gamity complies fully with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Children’s Code (Age Appropriate Design Code)
- Privacy and Electronic Communications Regulations (PECR)
- Safeguarding legislation relevant to children and young people

Gamity recognises that children require enhanced protection when processing their personal data.

2. Scope of This Policy

This policy applies to all data collected by Gamity in:

- Pop-up gaming events
- Permanent gaming centre operations
- Online competitions
- Website user accounts
- G Tokens loyalty system

- Safeguarding records
- Volunteer and staff management
- Marketing and communications
- CCTV (if installed)

3. Definitions

Personal Information – Any information about a data subject

Special Category Data – Sensitive data including health information, SEND status, ethnicity, religion, etc.

Processing – Collecting, storing, using, sharing or deleting data.

Data Subject – The individual whose data is being processed.

ICO – Information Commissioner’s Office.

4. Data Protection Principles

When we process personal information, we do so in accordance with the Data Protection Principles. Gamity will ensure Personal Information is:

1. Lawfulness, fairness and transparency – processed lawfully, fairly and in a transparent manner
 2. Purpose limitation – collected only for specified, explicit and legitimate purposes
 3. Data minimization – Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed
 4. Accuracy – accurate and where necessary kept up to date
 5. Storage limitation – not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed
 6. Integrity, Security and confidentiality – processed in a manner that ensures its security using appropriate technical and organizational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage
 7. Accountability – we recognize that not only must we comply with data protection principles but we must also demonstrate our compliance with these principles
-

5. Lawful Bases for Processing

Gamity processes data under the following lawful bases:

a) Consent

Used for:

- Marketing emails
- Photography/video
- Optional profile features
- G Tokens online profiles (parental consent required under 13)

Consent must be:

- Freely given
 - Specific
 - Informed
 - Unambiguous
 - Withdrawable at any time
-

b) Contract

Used for:

- Event registrations
 - Membership sign-ups
 - Online competition entry
 - Merchandise purchases
-

c) Legal Obligation

Used for:

- Safeguarding reporting
- DBS records

- Financial record keeping (HMRC)
 - Health & Safety documentation
-

d) Vital Interests

Used in emergencies where life or safety is at risk.

e) Legitimate Interests

Used for:

- Managing attendance
- Behaviour logs
- Internal safeguarding risk monitoring
- Improving services

A Legitimate Interest Assessment (LIA) will be completed where required.

6. Data Collected by Gamity

Children & Young People

- Full name
- Date of birth
- Parent/carer contact details
- Emergency contacts
- Medical information (where necessary)
- SEND/disability information
- Attendance records
- Behaviour logs
- Online usernames (where relevant)
- G Tokens balance/activity

- Competition results

Gamity does NOT knowingly collect unnecessary sensitive data.

Parents/Carers

- Name
 - Contact details
 - Consent records
 - Payment information (via secure third-party processor)
-

Staff & Volunteers

- Contact information
 - DBS status
 - References
 - Training records
 - Safeguarding training evidence
 - Payroll information
-

7. Children's Data & Online Safety (Critical Section)

Because Gamity works with children:

- Under 13s require **verifiable parental consent** for online accounts.
- Privacy notices will be written in child-friendly language.
- Default settings for online profiles will be set to **maximum privacy**.
- Public leaderboards will not display full names of children.
- No direct private messaging between users unless moderated.
- Online competition chat must be monitored.
- Data collection will be minimal and purpose-driven.

Gamity follows the ICO Children's Code standards.

8. G Tokens System – Data Handling

The G Tokens system involves profile tracking.

Gamity will:

- Only record necessary participation data
- Avoid public display of sensitive data
- Never convert G Tokens into cash
- Not sell or share behavioural data
- Allow parents to request full activity logs
- Securely store token balances in encrypted systems

G Tokens are a reward system, not a financial account.

9. Safeguarding Records

Safeguarding records are:

- Stored separately from general participant data
- Restricted to DSL and Deputy DSL only
- Encrypted if digital
- Stored in locked cabinet if physical
- Never discussed outside safeguarding need-to-know basis

Retention:

- Until child reaches 25 years old
 - Or 7 years after last contact minimum
-

10. Data Storage & Security

Gamity ensures:

Digital Security

- Password protected systems
- Two-factor authentication where possible
- Encrypted cloud storage
- Role-based access control
- Secure backups
- Antivirus and firewall protection

Physical Security

- Locked cabinets
- Restricted office access
- No unattended paperwork

Devices

- No personal devices storing sensitive data
- Remote wipe capability where possible

11. Data Sharing

Gamity will only share data:

- With safeguarding authorities where required
- With emergency services if necessary
- With funding bodies (anonymised where possible)
- With partners under formal Data Sharing Agreements
- With parents/carers regarding their child

Gamity will never sell personal data.

12. Data Retention Schedule

| Data Type | Retention Period |
|---------------------------|---|
| Event Registers | 3 years |
| Accident Reports | 3 years (longer if serious) |
| Safeguarding Records | Until age 25 or 7 years minimum |
| Staff Records | 6 years after leaving |
| Financial Records | 6 years |
| CCTV Footage | 30 days (unless required for investigation) |
| Marketing Consent Records | Until withdrawn |

13. Individual Rights

Individuals have the right to:

- Access their data (Subject Access Request)
- Correct inaccurate data
- Erase data (where legally possible)
- Restrict processing
- Object to processing
- Data portability
- Complain to the ICO

Gamity will respond to Subject Access Requests within **30 days**.

14. Subject Access Request Procedure

Requests must:

- Be in writing (email accepted)
- Verify identity
- Specify requested data

Safeguarding exemptions may apply.

15. Data Breach Procedure

A breach includes:

- Lost devices
- Hacked accounts
- Accidental email disclosure
- Stolen paperwork

Gamity will:

1. Contain the breach immediately
 2. Inform the Data Protection Lead
 3. Assess risk
 4. Report to ICO within 72 hours if required
 5. Inform affected individuals if high risk
 6. Document breach in breach log
-

16. Staff & Volunteer Responsibilities

All personnel must:

- Complete data protection training
- Sign confidentiality agreement
- Only access necessary data
- Report breaches immediately
- Follow secure password protocols

Failure to comply may result in disciplinary action.

17. Data Protection Lead (DPL)

Gamity will appoint a Data Protection Lead responsible for:

- GDPR compliance
 - ICO registration
 - Policy reviews
 - Training
 - Handling breaches
 - Overseeing Subject Access Requests
-

18. ICO Registration

Gamity will:

- Register with the ICO
 - Pay the annual data protection fee
 - Display ICO registration number on website
-

19. CCTV (If Applicable)

- Clear signage displayed
 - Footage stored securely
 - No audio recording
 - Used only for safeguarding and security
 - Access limited to authorised personnel
-

20. Marketing & Communications

- Opt-in consent required
- Easy unsubscribe options
- No marketing to children without parental consent
- No sharing contact data with third parties

21. Review & Monitoring

This policy will be:

- Reviewed annually
- Reviewed after major operational changes
- Updated following legislation changes

22. Related Policies

- Safeguarding Policy
- Online Safety Policy
- SEND Policy
- Code of Conduct
- Complaints Policy
- Whistleblowing Policy
- IT Acceptable Use Policy

23. Policy Approval

Name: Adam Pettitt

Role: Founder and director

Date: 03/03/2026