



GDPR & Confidentiality Policy

Effective Date: 02/10/2025

Splatter & Spark is committed to protecting the privacy and rights of all children, families and individuals who engage with our services. This policy outlines how we collect, use, store and protect personal information in line with the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Data Protection Act 2018 (Ireland).

1. Principles of Data Protection

We comply with GDPR by ensuring that all personal information is:

- Processed lawfully, fairly and transparently.
- Collected for specified, explicit and legitimate purposes only.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date.
- Stored only as long as necessary.
- Processed securely to protect against loss, misuse or unauthorised access.

2. Information We Collect

We may collect the following categories of personal data:

- **Parent/guardian information:** names, phone numbers, email addresses, emergency contacts.

- **Child information:** names, ages, medical needs, allergies, accessibility requirements and any details required to ensure safe participation.
- **Booking and payment information:** collected securely through third-party providers.
- **Safeguarding records:** where legally required for child protection purposes.

3. Legal Basis for Processing Data

We process personal data under the following GDPR legal bases:

- **Consent:** where you have given clear consent (e.g., marketing updates, photos/videos).
- **Contract:** to deliver the services you book with us.
- **Legal obligation:** to meet safeguarding, child protection or health and safety requirements.
- **Vital interests:** to protect someone's life in an emergency.
- **Legitimate interests:** for safe and effective service delivery.

4. Confidentiality

- All personal information shared with us is treated as strictly confidential.
- Staff and volunteers are bound by a confidentiality agreement.
- Information is only shared outside Splatter & Spark if:
 - Required by law (e.g., child protection concerns).
 - Necessary to protect the safety of a child or vulnerable person.
 - You provide explicit written consent (e.g., to share with schools, therapists or health professionals).

5. Data Retention

- Booking and contact details: kept for **up to 1 year** after services are provided.
- Medical, allergy, and safeguarding records: kept in line with **legal safeguarding requirements** (up to **7 years** or until a child turns 18, whichever is longer).
- Payment records: kept for **6 years** in line with financial regulations.
- After retention periods, records are securely destroyed (digital deletion or shredding).

6. Data Security

We take appropriate technical and organisational measures to protect personal data, including:

- Secure password-protected digital storage.
- Restricted access to personal data (only staff who need it).
- Encrypted payment processing via third-party providers.
- Locked and limited-access storage for any paper records.

7. Your Rights under GDPR

You have the following rights:

- **Right to access** – request a copy of your data.
- **Right to rectification** – correct inaccurate or incomplete data.
- **Right to erasure (“right to be forgotten”)** – request deletion of data where no legal reason requires us to keep it.
- **Right to restrict processing** – limit how your data is used.
- **Right to data portability** – request transfer of data to another provider.
- **Right to object** – stop processing where consent is the only legal basis.

- **Right to withdraw consent** – at any time, where processing is based on consent.

To exercise these rights, please contact us (see Section 9).

8. Photography & Media

- We will never photograph or record children without explicit written parental/guardian consent.
- Consent may be withdrawn at any time.
- Images are stored securely and only used for the purposes stated on the consent form.

9. Contact Us

If you have questions, concerns or requests about your data:

Splatter & Spark

Email: hello@splatterandspark.com

You also have the right to lodge a complaint with:

Data Protection Commission (DPC), Ireland

Website: <https://www.dataprotection.ie>

Tel: +353 57 868 4800