



CHAP IN THE BOX STUDIOS

DATA PROTECTION POLICY

Chap in the Box Studios Ltd (hereinafter referred to as "the Company") is committed to protecting the privacy and security of personal data. This Data Protection Policy outlines how we handle personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Purpose

This policy aims to ensure that personal data is processed fairly, lawfully, and transparently, safeguarding the rights of individuals and complying with legal obligations.

Scope

This policy applies to all employees, contractors, and third parties who have access to personal data processed by the Company.

Definitions

- **Personal Data:** Any information that relates to an identified or identifiable individual.
- **Processing:** Any operation performed on personal data, including collection, storage, use, and deletion.
- **Data Subject:** An individual whose personal data is being processed.
- **Data Controller:** The entity that determines the purposes and means of processing personal data.
- **Data Processor:** An entity that processes personal data on behalf of the Data Controller.

Data Protection Principles

The Company adheres to the following principles:

- **Lawfulness, Fairness, and Transparency:** Personal data will be processed lawfully, fairly, and transparently.
- **Purpose Limitation:** Personal data will be collected for specified, legitimate purposes and not further processed in a manner incompatible with those purposes.
- **Data Minimization:** Personal data will be adequate, relevant, and limited to what is necessary for the purposes of processing.
- **Accuracy:** Personal data will be accurate and kept up to date.
- **Storage Limitation:** Personal data will be kept in a form which permits identification of data subjects for no longer than necessary.

- Integrity and Confidentiality: Personal data will be processed securely to protect against unauthorised access, processing, destruction, or accidental loss.

Responsibilities

- Tom Tucker, acting as Data Protection Officer (DPO) is responsible for overseeing data protection activities and ensuring compliance with this policy.
- Employees: All employees must adhere to this policy and handle personal data responsibly.

Data Collection and Processing

- Lawful Basis: Personal data will be processed based on lawful bases as outlined in the UK GDPR, including consent, contract performance, legal obligation, vital interests, public task, or legitimate interests.
- Data Collection: Personal data will be collected for specific, legitimate purposes and kept accurate and up to date.
- Data Use: Personal data will be used only for the purposes for which it was collected.

Data Subject Rights

Data subjects have the following rights:

- Right to Access: Request access to personal data held by the Company.
- Right to Rectification: Request correction of inaccurate or incomplete personal data.
- Right to Erasure: Request deletion of personal data when it is no longer necessary for processing.
- Right to Restriction of Processing: Request restriction of processing in certain circumstances.
- Right to Data Portability: Request transfer of personal data to another organization or directly to the data subject.
- Right to Object: Object to processing based on legitimate interests or direct marketing.

Data Security

- Technical Measures: The Company implements appropriate technical measures to protect personal data, including encryption, secure access controls, and regular security assessments.
- Organizational Measures: The Company has established policies and procedures to safeguard personal data, including employee training and confidentiality agreements.

Data Breaches

- Reporting: Employees must immediately report any data breaches or security incidents to a member of senior management.
- Response: The Company will assess and respond to data breaches in accordance with legal requirements, including notifying the Information Commissioner's Office (ICO) and affected individuals if necessary.

Data Retention

Personal data will be retained only for as long as necessary to fulfill the purposes for which it was collected. The Company has established data retention schedules to ensure that personal data is securely deleted or anonymised when no longer required.

Third-Party Processing

When engaging third-party processors, the Company ensures that appropriate data protection agreements are in place, in line with UK GDPR requirements. These agreements will outline the data protection obligations of the third party.

International Data Transfers

If applicable, personal data may be transferred outside the UK. The Company will ensure such transfers comply with UK GDPR requirements, including using Standard Contractual Clauses (SCCs) or ensuring adequacy decisions where applicable.

Cookies and Online Data

If applicable, the Company will provide clear information about the use of cookies and online data collection, in compliance with the Privacy and Electronic Communications Regulations (PECR).

Policy Review

This policy will be reviewed annually and updated as necessary to ensure continued compliance with data protection laws and best practices.

Contact

For any questions or concerns about this policy or data protection practices, please contact: Tom Tucker – tom@chapintheboxstudios.com