



# GDPR Policy

## Policy Statement

Starmaker PAA Ltd is committed to protecting the rights and privacy of individuals, including learners, staff and others, in accordance with the General Data Protection Regulation (hereinafter referred to as "the GDPR") May 2018.

The new regulatory environment demands higher transparency and accountability in how Starmaker manages and uses personal data. It also accords new and stronger rights for individuals to understand and control that use. The GDPR contains provisions that Starmaker will need to be aware of as data controllers, including provisions intended to enhance the protection of learners' personal data.

We must ensure that Starmaker privacy notices are written in a clear, plain way that learners and staff will understand. (See the Privacy Statement)  
To comply with various legal obligations, including the obligations imposed on it by the GDPR, Starmaker must ensure that all this information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

## Statement of Principles

In order to comply with its obligations, Starmaker undertakes to adhere to the eight principles:

★ **Process personal data fairly and lawfully.**  
Starmaker will make all reasonable efforts, where necessary, to ensure that data subjects are informed of the identity of the data controller: (The Principal), the purposes of the processing, any disclosures to third parties that are envisaged, given an indication of the period for which the data will be kept, and any other information which may be relevant.

★ **Process the data for the specific and lawful purpose for which it collected that data and not further process the data in a manner incompatible with this purpose.**

Starmaker will ensure that the reason for which it collected the data originally is the only reason for which it processes those data, unless the individual is informed of any additional processing before it takes place.

★ **Ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed.**

Starmaker will not seek to collect any personal data which is not strictly necessary for the purpose for which it was obtained. If any irrelevant data is given by individuals, it will be destroyed immediately.

★ **Keep personal data accurate and, where necessary, up to date.**

Starmaker will review and update all data on a regular basis. It is the responsibility of the individuals giving their personal data to ensure that this is accurate, and each individual should notify Starmaker if, for example, a change in circumstances mean that the data needs to be updated. It is the responsibility of Starmaker to ensure that any notification regarding the change is noted and acted on.

★ **Only keep personal data for as long as is necessary.**  
Starmaker undertakes not to retain personal data for longer than is necessary to ensure compliance with the GDPR, and any other statutory requirements. This means:

Starmaker will undertake a regular review of the information held and implement a weeding process.

Starmaker will dispose of any personal data in a way that protects the rights and privacy of the data subject (e.g. secure electronic deletion, shredding and disposal of hard copy files as confidential waste). A log will be kept of the records destroyed.

★ **Process personal data in accordance with the rights of the data subject under the legislation.**

Individuals have various rights under the legislation including a right to:

- be told the nature of the information Starmaker holds and any parties to whom this may be disclosed;
- prevent processing likely to cause damage or distress;
- prevent processing for purposes of direct marketing;
- be informed about the mechanics of any automated decision making process that will significantly affect them;
- not have significant decisions that will affect them taken solely by automated process;
- sue for compensation if they suffer damage by any contravention of the GDPR;
- take action to rectify, block, erase or destroy inaccurate data;
- request that the Office of the Information Commissioner assess whether any provision of the Act has been contravened.  
Starmaker will only process personal data in accordance with individuals' rights.

★ **Put appropriate technical and organisational measures in place against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of data.**

All members of staff are responsible for ensuring that any personal data which they hold is kept securely and not disclosed to any unauthorised third parties. Starmaker will ensure that all personal data is accessible only to those who have a valid reason for accessing it.

Starmaker will have in place appropriate security measures e.g. ensuring that hard copy personal data is kept in lockable filing cabinets/cupboards or archive rooms with controlled access:

- keeping all personal data in a lockable cabinet with key-controlled access;
- password protecting personal data held electronically;
- archiving personal data which is then kept securely (lockable cabinet);
- placing any PCs or terminals, CCTV camera screens etc. that show personal data so that they are not visible except to authorised staff;
- ensuring that PC screens are not left unattended without a password protected screen-saver being used.

In addition, Starmaker will put in place appropriate measures for the deletion of personal data – manual records will be shredded or disposed of as 'confidential waste' and appropriate contract terms will be put in place with any third parties undertaking this work. Hard drives of redundant PCs will be wiped clean before disposal or, if that is not possible, destroyed physically. A log will be kept of the records destroyed.

This policy also applies to staff and students who process personal data 'offsite', e.g. when working at home, and in circumstances additional care must be taken regarding the security of the data.

★ **Ensure that no personal data is transferred to a country or a territory outside the European Economic Area (EEA) unless that country or territory ensures adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.**

Starmaker will not transfer data to such territories without the explicit consent of the individual.

This also applies to publishing information on the internet – because transfer of data can include placing data on a website that can be accessed from outside the EEA – so Starmaker will always seek the consent of individuals before placing any personal data (including photographs) on its website.

If Starmaker collects personal data in any form via its website, it will provide a clear and detailed privacy statement prominently on the website, and wherever else personal data is collected.

## Scope

This policy applies to all staff at Starmaker. Any breach of this policy or of the GDPR itself will be considered an offence and Starmaker's disciplinary procedure will be invoked.

As a matter of best practice, other agencies and individuals working with Starmaker and who have access to personal information, will be expected to read and comply with this policy.

## Legal Framework

The GDPR comes in to force on the 25 May 2018. It regulates the storing, processing and destruction of personal data and protects the rights and privacy of all living individuals (including children).

Personal data is information relating to an individual and may be in hard or soft copy (paper/manual files; electronic records; photographs; CCTV images), and may include facts or opinions about a person.

