



Privacy Policy

Pocket Money Adventures CIC

Version 1.3

Effective date: 24 April 2026

Review date: 24 April 2027

Approved by: Nathan Waldron, Director, on behalf of the Board of Directors (Pocket Money Adventures CIC)

Pocket Money Adventures CIC

Registered office: 68 Nottingham Road, Eastwood, Nottingham, NG16 3NQ

Company No. 16994988 • ICO Registration No. ZC124930

General contact: hello@pocketmoneyadventures.co.uk

Safeguarding contact: support@pocketmoneyadventures.co.uk

Data Protection contact: dpo@pocketmoneyadventures.co.uk

Designated Safeguarding Lead: Nathan Waldron

Deputy DSL: Bernadette Houlton

Introduction

This Privacy Policy explains how Pocket Money Adventures CIC ("PMA", "we", "us", "our") collects and uses personal data when you interact with us (including via our website, resources, pilots, and communications).

1. Our core privacy promise — the "Zero Child Data" guarantee

PMA exists to build behavioural habits, not to monitor personal finances.

We do not collect, store, or process any identifiable personal data or personal financial data from children. Any impact measurement or evaluation delivered in schools is designed to be anonymised and aggregated at a classroom or group level. We evaluate language and habit adoption (for example, the "Tap. Tap. Pause." routine), not individual family budgets, spending, or child identities.

Every piece of research delivered with partner schools uses a match-code system that is held only by the school. PMA never sees a child's name.

2. Who we are

Pocket Money Adventures CIC is a Community Interest Company and a private company limited by guarantee without share capital. We are the data controller responsible for your personal data.

Registered office: 68 Nottingham Road, Eastwood, Nottingham, England, NG16 3NQ.

Company No. 16994988. ICO Registration No. ZC124930.

General contact: hello@pocketmoneyadventures.co.uk.

Data Protection (SAR, rights, breaches): dpo@pocketmoneyadventures.co.uk.

Safeguarding: support@pocketmoneyadventures.co.uk.

Complaints: complaints@pocketmoneyadventures.co.uk.

Whistleblowing: whistleblowing@pocketmoneyadventures.co.uk.

Designated Safeguarding Lead: Nathan Waldron. Deputy DSL: Bernadette Houlton (appointed 22 April 2026).

3. The data we collect (adults only)

We only collect personal data from consenting adults (parents/carers, teachers, school staff, partners, sponsors, supporters, suppliers, and professional advisers). Depending on your relationship with us, we may collect:

- Identity and contact data: name, email address, job title, organisation, postal address where provided
- Consent data: record of whether and when consent was given, for which purpose, and when withdrawn
- Interaction data: emails, calls, and meetings you have had with us; events you have attended
- Delivery data: where you are a teacher or headteacher, the operational data needed to plan and run a pilot in your school
- Research data: where you have consented to provide anonymous research responses, your responses (teachers, parents, headteachers)
- Website usage data: IP address (truncated), device, pages visited — see the Cookie Policy for detail

4. What we do not collect

- Any personal data from children identified as an individual
- Personal financial data (bank details, account numbers, transaction records) from any child or any family as part of programme delivery
- Special category data unless you have explicitly consented and we have a defensible reason to process it

5. Our lawful bases

We process your personal data under one or more of the following UK GDPR Article 6 lawful bases:

- Consent (Article 6(1)(a)) — for marketing, parent prompts, and any research activity
- Contract (Article 6(1)(b)) — where you are a school, sponsor, or supplier and we need to process your data to fulfil our agreement
- Legal obligation (Article 6(1)(c)) — safeguarding, tax, company law
- Legitimate interests (Article 6(1)(f)) — for pipeline management, partner updates, and internal research improvement, where our interests do not override your rights

6. How we use your data

- To run the programme — delivering sessions, providing materials, coordinating with schools
- To run the research — measuring outcomes, improving the programme, publishing findings
- To keep you informed — newsletter, programme updates, sponsor updates
- To meet our legal and regulatory obligations — including safeguarding and data protection

7. Who we share it with

- Our UK-based Microsoft 365 tenant (infrastructure only, no processing outside the UK)
- Mailchimp, where you have opted in to our mailing list (UK/EU infrastructure, SCCs confirmed)
- Our accountants and auditors, where required for tax and company law compliance
- Law enforcement or regulators, where required by law (including safeguarding authorities)
- Research partners, in anonymous aggregate form only — never identifiable

We do not sell your personal data to anyone, for any purpose.

8. How long we keep it

- Identifiable data (emails, audio recordings pre-transcription): deleted within five working days of transcription or the end of the study, whichever is sooner
- Anonymous questionnaire data: five years, then deleted
- Parent and teacher mailing list data: until you withdraw consent or after two years of inactivity, whichever is sooner
- Employment and payroll records: six years post-exit
- Financial records: six years post-year-end (Companies Act and VAT)
- Safeguarding records: per KCSIE 2025 retention schedule (typically to age 25 for the subject)
- Aggregate anonymous findings in the white paper: indefinitely

9. Your rights

Under UK GDPR you have the right to:

- Be informed about how we use your data (this policy)
- Access your personal data (Subject Access Request — email dpo@pocketmoneyadventures.co.uk)
- Rectification — ask us to correct inaccurate data
- Erasure — ask us to delete your data, subject to our legal retention obligations
- Restriction — ask us to stop processing your data in certain circumstances
- Portability — receive your data in a portable, machine-readable format
- Object — to processing based on legitimate interests, or to direct marketing
- Withdraw consent — where our basis is consent, at any time

To exercise your rights, email dpo@pocketmoneyadventures.co.uk. The Subject Access Request Procedure (PMA-SAR-001 v1.0) sets out the full process. We may need to confirm your identity before responding. We will respond within one calendar month of verifying your identity, extendable by two further months for complex or multiple requests, with notification.

10. Direct marketing

You can opt out at any time by using the unsubscribe link in our emails (where included) or by emailing hello@pocketmoneyadventures.co.uk. Operational or service emails (for example, delivery logistics or pilot coordination) may still be sent where necessary.

11. Data security

Personal data is stored on our UK-based Microsoft 365 tenant, encrypted at rest, and access is protected by multi-factor authentication. Role-based access is applied to limit visibility to only those who need it. Our data-breach response plan requires reporting to the ICO within 72 hours of awareness of any qualifying breach, per UK GDPR Article 33.

12. Complaints and supervisory authority

We would appreciate the opportunity to resolve your concern first. Please contact us at complaints@pocketmoneyadventures.co.uk and we will respond promptly. If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection.

ICO contact details: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Helpline: 0303 123 1113. Website: ico.org.uk.

13. Changes to this policy

We review this policy annually or whenever material changes occur. The effective date at the top of this policy is the date it takes effect. Previous versions are retained for audit.

Linked policies and references

- Subject Access Request Procedure v1.0 (PMA-SAR-001)
- Record of Processing Activities v1.0 (UKGDPR Article 30)
- Cookie Policy v1.1 (website)
- Parental Consent and GDPR Pack v2.0
- Complaints Policy v1.0
- Whistleblowing Policy v1.1
- Safeguarding Policy v1.3

Version history

- v1.0 — 26 February 2026. Initial policy.
- v1.1 — subsequent revisions.
- v1.2 — 26 February 2026 refresh.
- v1.3 — 24 April 2026. Rebranded to PMA house style. Added ICO registration number ZC124930. Added Company No. Added Deputy DSL (Bernadette Houlton). Added [dpo@](mailto:dpo@pocketmoneyadventures.co.uk), [complaints@](mailto:complaints@pocketmoneyadventures.co.uk), [whistleblowing@](mailto:whistleblowing@pocketmoneyadventures.co.uk), and [support@](mailto:support@pocketmoneyadventures.co.uk) contact routes. SAR now routed explicitly to [dpo@](mailto:dpo@pocketmoneyadventures.co.uk) and cross-referenced to the new SAR Procedure. Added data breach response summary and ICO 72-hour reporting clock reference.

Approved by Nathan Waldron, Director, on 24 April 2026.