



# Record of Processing Activities (RoPA)

## Pocket Money Adventures CIC

Version 1.0

Effective date: 24 April 2026

Review date: Quarterly, and on any material change to processing (next: 24 July 2026)

Approved by: Nathan Waldron, Director, acting as de facto Data Protection Officer

### 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](mailto:hello@pocketmoneyadventures.co.uk)

**Safeguarding contact:** [support@pocketmoneyadventures.co.uk](mailto:support@pocketmoneyadventures.co.uk)

**Designated Safeguarding Lead:** Nathan Waldron

**Deputy DSL:** Bernadette Houlton

### Purpose:

This register is the written record required under UKGDPR Article 30. It lists every purpose for which PMA processes personal data, the categories of data subject and personal data involved, the lawful basis, the recipients, the retention period, and the security measures in place.

The Article 30 obligation on controllers with fewer than 250 staff is limited to non-occasional processing, processing likely to result in a risk to rights and freedoms, or processing of special category data. All three apply to PMA because it processes children's data.

### Controller and representative:

Pocket Money Adventures CIC is the data controller for all processing in this register. There is no joint controller, no EU representative (UK-only processing), and no group structure. ICO Registration No. ZC124930. Company No. 16994988. Registered office: 68 Nottingham Road, Eastwood, Nottingham, NG16 3NQ.

Data Protection contact: Nathan Waldron, Director, via [dpo@pocketmoneyadventures.co.uk](mailto:dpo@pocketmoneyadventures.co.uk) (live 24 April 2026).

### Processing activities:

Purpose	Data subjects & personal data	Lawful basis (UKGDPR Art 6)	Recipients / processors	Retention	Security measures
Pilot research — pupil workbook data	Pupils (KS1/KS2). Anonymous match code only. No name. Age band, year group, workbook responses.	Article 6(1)(a) consent (parental, Art 8). Article 9(2) (a) for any incidental special category data.	PMA tenant (UK M365). No third-party processors. Aggregate findings shared with schools, YE, funders.	Anonymous data: 5 years. Match-code lookup kept by school only, not by PMA.	UK M365, encrypted at rest, MFA, role-based access. No transfer outside UK.

Parental consent forms	Parents/carers. Name, signature, email (optional), consent selections, child's code.	Article 6(1)(a) consent. Article 8 parental authorisation for under-13s.	PMA tenant. School retains the paper originals.	5 years post-pilot, then secure destruction.	Paper: locked cabinet at school. Digital: UK M365, encrypted, MFA.
Parent weekly prompt mailing list	Parents. Email address, prompt engagement data.	Article 6(1)(a) consent (opt-in at consent stage).	Mailchimp (UK/EU servers, SCCs confirmed). PMA tenant for list.	Until consent withdrawn or 2 years inactivity.	Mailchimp 2FA, PMA tenant MFA, unsubscribe link in every email.
Teacher research instruments	Teachers. Work email, role, responses.	Article 6(1)(a) consent plus Article 6(1)(f) legitimate interest (research improvement)	PMA tenant. Aggregate findings published in white paper.	5 years anonymous ; identifiable email deleted within 5 working days of pilot end.	UK M365, MFA, role-based access.
Headteacher interviews	Headteachers. Name, school, role, interview audio (pre-transcription), transcript.	Article 6(1)(a) consent.	PMA tenant. Transcription internal only.	Audio deleted within 5 working days of transcription. Transcript anonymised then held 5 years.	Audio stored offline on encrypted device until transcribed.
Sponsor relationship management	Sponsor contacts. Name, role, organisation, email, phone, contract data.	Article 6(1)(b) contract plus Article 6(1)(f) legitimate interest (pipeline).	PMA tenant. HubSpot / CRM if adopted (subject to DPA).	Duration of commercial relationship + 6 years (contract + limitation).	CRM MFA, PMA tenant MFA.
Staff and contractor HR data	Staff, contractors, volunteers. Name, address, DOB, NI, bank details, right-to-work, DBS status, references.	Article 6(1)(b) contract + 6(1)(c) legal obligation + 9(2)(b) employment law.	HMRC, NEST pension, payroll provider (to appoint), umbrella DBS body.	Employment records: 6 years post-exit. Payroll: 6 years. DBS: retained per KCSIE guidance.	Locked digital HR file, access limited to Director and appointed HR lead.
Safeguarding records	Any subject of a safeguarding concern. Minimal personal data per KCSIE.	Article 6(1)(c) legal obligation + 6(1)(e) public task + 9(2)	LADO, Children's Social Care, police (as applicable).	Per KCSIE 2025 and IICSA recommendations —	Locked digital file, DSL access only. Paper originals in

		(b)/(g).	PMA retains the local record.	typically to age 25 for the subject.	locked cabinet.
Marketing and newsletter list (non-parent)	Subscribers. Email, first name, segment.	Article 6(1)(a) consent (double opt-in).	Mailchimp.	Until withdrawal or 2 years inactivity.	2FA, unsubscribe in every email.
Website analytics	Website visitors. IP (truncated), device, pages viewed.	Article 6(1)(f) legitimate interest plus PECR consent for non-essential cookies.	Google Analytics 4 (IP truncation on) plus Google Search Console.	26 months.	Cookie consent banner, GA4 IP truncation.
Financial records	Suppliers, customers, directors. Contract data, invoices, bank details.	Article 6(1)(b) contract + 6(1)(c) Companies Act / HMRC.	HMRC, accountant (to appoint), bank.	6 years post-year-end (Companies Act / VAT).	Accounting software MFA, UK-hosted.

### Transfers outside the UK:

No personal data is transferred outside the UK. Mailchimp operates under UK-ICO-approved Standard Contractual Clauses; PMA's list processing is confirmed to use UK/EU infrastructure.

### Version history:

- v1.0 — 24 April 2026. Initial register, ten processing activities. Next review: 24 July 2026 or on material change (for example: appointing HR provider, moving CRM, onboarding illustrator, new sponsor contract at scale).

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