

Diapason Ltd T/A Young Music Makers (YMM) Privacy Policy

**Chair of Trustees: Alison Chandler
Administrative Director: Rebecca McChrystal
Registered charity No. 264274**

Last update: 22/09/2019

Draft for approval by Trustees: 27/09/2019

Date approved: 28/09/2019

Date of review: Annually 12 months after approval date

Introduction

This notice applies for our website and all the services we provide. For the purpose of this notice, we'll just call them our 'services'.

When we say 'personal data' we mean identifiable information about you, like your name, email, address, telephone number, bank account details, payment information, support queries, community comments and so on. If you can't be identified (for example, when personal data has been aggregated and anonymised) then this notice doesn't apply. We may need to update this policy from time to time. Where a change is significant, we'll make sure we email to let you know.

Who are 'we'?

When we refer to 'we' (or 'our' or 'us'), that means registered charity "Diapason Limited, trading as Young Music Makers". Our headquarters are in the UK. We provide individual and group music lessons on a Saturday to students of all ages.

Our principles of data protection

We take responsibility for processing your data with:

Transparency.

- data will be processed lawfully, fairly and in a transparent manner in relation to individuals;
- data will be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes
- data will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

Accuracy

- data will be accurate and, where necessary, kept up to date

- every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay

A clear retention period with basis in law

- Data will be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals

Security

- data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

How we collect your data

When you visit our websites or use our services, we collect personal data. The ways we collect it can be broadly categorised into the following:

Information you provide to us directly: When you visit our website or access our services, we might ask you to provide personal data to us. For example, we ask for your contact information when you sign up for a free trial, respond to a job application or an email offer, participate in community forums, join us on social media, take part in training and events, contact us with questions or request support. If you don't want to provide us with personal data, you don't have to, but it might mean you can't use some parts of our websites or services.

Information we collect automatically: We collect some information about you automatically when you visit our websites or use our services, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you're using our websites and services so that we can continue to provide the best experience possible (e.g., by personalising the content you see).

This information is collected using cookies, via google analytics. If you want to find out more about the types of cookies we use, why, and how you can control them, take a look at [how google uses cookies](#).

Where we collect personal data, we'll only process it:

- to perform a contract with you, or
- where we have legitimate interests to process the personal data and they're not overridden by your rights, or
- in accordance with a legal obligation, or
- where we have your consent.

If we don't collect your personal data, we may be unable to provide you with all our services, and some services may not be available to you.

How we use your data

First and foremost, we use your personal data to provide you with any services you've requested, and to manage our relationship with you. We also use your personal data for other purposes, which may include the following:

To communicate with you.

This may include:

- providing you with information you've requested from us (like lesson times or concert dates) or information we are required to send to you
- operational communications, like invoices, changes to our services, policy updates, etc.
- marketing communications in accordance with your marketing preferences, such as letting you know about summer schools, or other courses that may be of benefit to our students.
- asking you for feedback or to take part in any research we are conducting (which we may engage a third party to assist with).

To enhance our websites and services and develop new ones: For example, by tracking and monitoring your use of websites and services so we can keep improving, or by carrying out technical analysis of our websites and services so that we can optimise your user experience and provide you with more efficient tools.

To protect: So that we can detect and prevent any fraudulent or malicious activity, and make sure that everyone is using our websites and services fairly.

To analyse, aggregate and report: We may use the personal data we collect about you to produce aggregated and anonymised analytics and reports, which we may share publicly or

with third parties. For example, tracking how many students we have in each group year-on-year.

How we can share your data

There will be times when we need to share your personal data with third parties. We will only disclose your personal data to:

- third party service providers and partners who assist and enable us to use the personal data to, for example, send invoices, such as Xero.
- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure.
- other people where we have your explicit, written consent. For example, if you request to be put in touch directly with your tutor.

International Data Transfers

When we share data, it may be transferred to, and processed in, countries other than the country you live in – such as to the United States, where our data hosting provider's servers are located. These countries may have laws different to what you're used to. Rest assured, where we disclose personal data to a third party in another country, we put safeguards in place to ensure your personal data remains protected.

For individuals in the European Economic Area (**EEA**), this means that your data may be transferred outside of the EEA. Where your personal data is transferred outside the EEA, it will only be transferred to countries that have been identified as providing adequate protection for EEA data (like New Zealand), or to a third party where we have approved transfer mechanisms in place to protect your personal data – i.e., by entering into the European Commission's [Standard Contractual Clauses](#), or by ensuring the entity is [Privacy Shield certified](#) (for transfers to US-based third parties).

Security

Security is a priority for us when it comes to your personal data. We're committed to protecting your personal data and have appropriate technical and organisational measures in place to make sure that happens, for example, access to data via an encrypted, cloud-based system.

Retention

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you've requested, or to comply with applicable legal, tax or accounting requirements).

We'll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our data retention policies and practices. Following that period, we'll make sure it's deleted or anonymised.

Your rights

It's your personal data and you have certain rights relating to it. When it comes to marketing communications, you can ask us not to send you these at any time – send your request to admin@youngmusicmakers.co.uk

You also have rights to:

- know what personal data we hold about you, and to make sure it's correct and up to date
- request a copy of your personal data, or ask us to restrict processing your personal data or delete it
- object to our continued processing of your personal data

You can exercise these rights at any time by sending an email to

admin@youngmusicmakers.co.uk

If you're not happy with how we are processing your personal data, please let us know by sending an email to admin@youngmusicmakers.co.uk. We will review and investigate your complaint, and get back to you within 1 month. If it is a complicated request, or one of many similar, simultaneous requests, this may not be possible and if so, will email you within one month with reasons for any delay. You can also complain to your local data protection authority. They will be able to advise you how to submit a complaint.

How to contact us

We're always keen to hear from you. If you're curious about what personal data we hold about you or you have a question or feedback for us on this notice, our websites or services, please get in touch.

Our email is admin@youngmusicmakers.co.uk

