

# Personal data and privacy statement



We process personal data relating to clients and customers, and to those who are interested in the services I provide.

We are committed to complying with our legal obligations in respect of data protection and privacy.

This statement sets out the principles we apply when processing personal data. This statement describes the types of personal data we may collect about you. This statement also describes what we do with any data we collect about you, how we will keep it secure and the legal bases on which we rely for processing your data. This statement also informs you of your rights and how you can contact us.

## About us and our services

I am a sole trader trading as Owl Music

Owl Music provides educational services

I am a Data Controller for the purposes of current data protection legislation.

My contact details are:

Ceri Jones

Owl Music

26A Lower Road River Dover CT170QU

07531 665665

admin@owlmusic.co.uk

www.owlmusic.co.uk

## What personal data do we collect from you?

Personal data is any information relating to an identifiable living individual. We only collect the personal data we need to be able to provide you with the services you have asked us to provide or tell you about.

**Personal/contact information:** this can include your name, contact address, email addresses, telephone numbers, your child's date of birth, instrument and grade

**Payment information:** your bank details for billing purposes.

**Digital information:** IP addresses, and details of your interaction with our website and social media, should you engage with us through these channels.

**Correspondence:** information relevant to your specific enquiries.

**Dietary Requirements** where this is required for catering

**Religious beliefs** where this is relevant to curriculum planning or event availability

**Any Additional Educational Needs** requirements including relevant medical information which may impact on participation in tuition, events or exams

**Name of your parent or guardian** (if you are under 18)

Contact details for your family members and next of kin

**Other:** any other information you choose to provide to us eg interests

## When do we collect personal data?

We will collect information about you, your parent or guardian when you enter into a contract with us, make enquiries about our services, visit our website or parent portal and engage with us on social media.

We may collect your personal data when you, your parent or guardian, or your school communicate with us by post, telephone, SMS, email or via our website; for example, in order to book or make enquiries about lessons or an event which may be run by a third party.

**Young People** – We collect relevant information about young people so they can receive automated reminder SMS, emails and access the online student portal. If you are 18 or under, please obtain your parent/guardian's permission before you provide any personal information to Owl Music.

### What is our lawful basis for processing your data?

We may only process personal data where we have a lawful basis to do so.

We may collect and process your personal data when:

1. it is necessary for the performance of contracts with you;
2. it is necessary for the purposes of our legitimate interests as a business. In these cases we will do so in a way which might reasonably be expected from our relationship with you, and which does not impact materially on your fundamental rights, freedom and interests. We will not process your personal data on this basis if we believe your rights override ours. Instead, we may seek your specific consent, and/or another legal basis;
3. it is necessary for compliance with legal obligations;
4. we have your consent to do so, for example in relation to marketing by electronic means.

Please see below for more detailed information about how we will use your data and on what basis.

If you have any concerns about our data processing please contact us: see **Contact**. Please also see **Your rights**, below.

### How will we use your personal data?

We may process the information we collect about you:

- to perform any contract we have agreed with you, or to respond to any enquiries you make in this connection before we enter into a contract. The lawful basis for this processing is performance of a contract with you or because you have asked us to take specific steps before entering into a contract in respect of these activities and services;
- to respond to any other enquiries or complaints. We need the information you supply to enable us to respond.
- to protect our business from fraud and other illegal activities. This processing is necessary for our legitimate interests by ensuring the proper management of our business and financial risks.
- to provide you with information by post (or by email, with your consent) about other products and services we offer similar in nature to those you currently receive or have previously asked about. Information we may process for this purpose includes your name, address and email address. This processing is necessary for marketing our services, which is a legitimate business interest.
  - We will only send marketing information to you by email if we have your consent. You have the right to withdraw your consent at any time. Please write, email or telephone us: see **Contact** below.
- to send you communications required by law or which are necessary to inform you about changes to the services we provide you, for example, updates to this Privacy Statement, and any information legally required which relates to any contracts between us. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. This processing is necessary for us to comply with our legal obligations.
- to administer our website, and send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. This processing is necessary for development of our services, which is a legitimate interest of our business. We have a legitimate interest to do so as this helps make our products or services more

relevant to you. You are free to opt out of receiving these requests from us at any time by contacting us.

### Who do we share your data with?

In some circumstances we may need to share your data with the following:

- Our accountants/auditors
- Accounting software company
- Direct debit company
- Examination boards
- Educational Establishments

We may also share your data with third parties, such as our IT consultants/outsourced IT network administrators/cloud-based back-up service/mailing house/email marketing company etc to support the efficient running of our business.

If this is necessary, we will provide only the information they need to perform the services we require. They will only use the data for the purposes we specify. We require third parties to maintain appropriate security to protect information from unauthorised access or processing.

In some circumstances, we may need to share your personal data with other third parties (including legal or other advisers, regulatory authorities, courts and government agencies) to enable us to enforce our legal rights, or where such disclosure may be permitted or required by law.

Unless we tell you otherwise, your data will not be processed outside the EEA.

### How long will we keep your data?

We will only keep personal data for as long as is necessary to provide our services, or for as long as we reasonably need to keep the information for the lawful business purposes or to comply with a statutory or other legal requirement.

If you consent to marketing, information we use for this purpose will be kept with us until you notify us that you no longer wish to receive this information.

### Data security

We will take appropriate technical and organisational measures to protect the personal data we transmit, store or otherwise process against accidental or unlawful destruction, loss, alteration or unauthorised disclosure or access. Our computers and mobile devices are password protected.

We may use cookies and log files on our website ([www.owlmusic.co.uk](http://www.owlmusic.co.uk)) to store information about how you use our website. A cookie is a piece of data stored on the user's computer tied to information about the user. This enables us to create a profile to make navigation easier and to direct you to information that best corresponds to your interests.

## Your rights

You may exercise your rights by contacting us using the details in **Contact**, below. We aim to handle any requests within a reasonable period and, in any event, within one calendar month of the original request.

### Right to information and access

You have the right to be informed about what personal data we collect about you, why, on what lawful basis and what your rights are. This Privacy Statement is the key document we use to inform you about this.

You also have a right to request access to the information that we hold about you, and to receive a copy of this information, along with other information which is generally contained in this Privacy Statement.

### Right to rectification

You have the right to request that inaccurate personal data be rectified or completed if it is incomplete.

### Right to erasure and restriction

You have the right to ask us to limit or cease processing or erase information we hold about you in certain circumstances. When responding to such requests, we will tell you how such restrictions or deletions may affect our ability to fulfil our contracts with you or otherwise affect your interests.

### Right to object

You have the right to object to our using your information for direct marketing. You can also ask us to stop using your information, where we are processing it on the basis of our legitimate interest. We will do so unless we believe we have a legitimate overriding justification to continue processing your personal data.

### Right to withdraw consent

If you have given us any specific consent to use your personal data, you have the right to withdraw it any time. If you wish to tell us that you are withdrawing your consent, please email us at [admin@owlmusic.co.uk](mailto:admin@owlmusic.co.uk)

## Complaints

If you are unhappy with the way we process your personal data, please contact us using the information provided below. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; Tel: 0303 123 1113 or 01625 545 745

<https://ico.org.uk/global/contact-us/>

## Contact

If you have any questions about this policy, or you wish to exercise any of your rights, please email us at [admin@owlmusic.co.uk](mailto:admin@owlmusic.co.uk), telephone us on 07531 665665 or write to Owl Music, 26a Lower Road, River Dover, CT17 0QU]

## Updates to this statement

We may change this privacy statement from time to time. We will post updates to this privacy statement on our website, and where appropriate, we may notify you by post or email. Please check our website to stay up to date.

Last updated March 2019



# Owl