

## **PRIVACY POLICY**

### **YOUR PERSONAL INFORMATION - GENERAL DATA PROTECTION REGULATION (GDPR)**

GDPR is bringing in new legal protection for personal information from May 2018. This tells you what personal information I hold and why, and what your rights are.

For purposes of EU data protection law, I, Nigel Ralf, am the data controller of your personal information. If you have any questions or concerns, you may contact me at:

**Name & Contact Details:** Nigel Ralf

**Telephone No:** 07910433265

**Email address:** [nigel@drum-beats.co.uk](mailto:nigel@drum-beats.co.uk)

**Address:** 44 Warwick St, Oxford, OX4 1SX

#### **What information I hold and what I do with it**

In order to provide instrument lessons privately and in schools, I will need to ask for and keep basic information on parents/carers and their children.

The information to be held will include:

- Your contact details, usually Name, Mobile, Email.
- Your children's names/school year.

Information is used for:

- Sending invoicing & payment requests
- Collating classes, attendance & progress measures
- General email correspondence & supporting information

#### **Data Sharing**

I will NOT share your information with anyone else (unless required for legal process, see below) without explaining why it is necessary and getting your explicit consent.

I may, however, under the day to day operation of our work, need to discuss and use information collected with tutors working with me. This will be purely in cases related to the classes they teach and usually on request from parents or to improve the services we provide.

Compliance with laws. I may collect, use, retain, and share your information if I have a good faith belief that it is reasonably necessary to: (a) respond to legal process or to government requests; (b) enforce my agreements, terms and policies; (c) prevent, investigate, and address fraud and other illegal activity, security, or technical issues; or (d) protect the rights, property, and safety of my customers, or others.

#### **Children's Privacy**

To request and progress starting private or school lessons, individuals must be 16 years of age or older. Any requests by individuals under the age of 16 for information and/or beginning lessons, will be referred to and involve contact with, supervision, and approval of a parent or legal guardian.

If we become aware that personal information has been submitted to us by an individual under 16 years of age without the consent of a parent or guardian, we will use reasonable efforts to delete that personal information from our files as soon as possible.

#### **Data Retention**

If you are taking, or have taken, paid lessons, I will hold your information for a period up to 7 years (from cessation of paid lessons), for compliance with tax obligations. If you have provided information but not taken paid lessons, I may hold that information for up to 2 years.

## **Protecting Your Personal Data**

I am committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, I have put in place appropriate technical, physical and managerial procedures to safeguard and secure the information we collect from you.

I will contact you using the contact preferences you have given me.

Your data will not be transferred outside the EU without your consent.

## **Your Rights**

GDPR gives you the following rights:

- The right to be informed:  
*To know how your information will be held and used (this notice).*
- The right of access:  
*To see your records of your personal information, so you know what is held about you and can verify it.*
- The right to rectification:  
*To tell me to make changes to your personal information if it is incorrect/ incomplete.*
- The right to erasure (also called “the right to be forgotten”):  
*For you to request me to erase any information I hold about you*
- The right to restrict processing of personal data:  
*You have the right to request limits on how I use your personal information*
- The right to data portability: *under certain circumstances you can request a copy of personal information held electronically so you can reuse it in other systems.*
- The right to object:.  
*To be able to tell me you don’t want me to use certain parts of your information, or only to use it for certain purposes.*
- Rights in relation to automated decision-making and profiling.
- The right to lodge a complaint with the Information Commissioner’s Office:  
*To be able to complain to the ICO if you feel your details are: a) incorrect, b) not being used in a way that you have given permission for, or c) being stored when they don’t have to be.*

Full details of your rights can be found at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of these rights or any questions or concerns, please email: [nigel@drumbeats.co.uk](mailto:nigel@drumbeats.co.uk)

May 2018