

Privacy Policy and GDPR compliance

Privacy Policy

This statement governs the manner in which I collect, use, maintain and disclose information collected from users of my services. It describes the types of personal data I may collect about you. It also describes what I do with any data I collect about you, how I will keep it secure and the legal bases on which I rely for processing your data. It also informs you of your rights and how you can contact me. This privacy policy applies to the <http://www.jswmusic.co.uk> website and all products and services offered by me.

1. About me and my services

I am a sole trader. I provide music educational services and live performance. I am a Data Controller for the purposes of current data protection legislation. My contact details are:

Jenny Walker (trading as JSW Music)

22 Berkshire Drive

Tel: 07799 271443

Email: jwalkergale@gmail.com

Website: <http://www.jswmusic.co.uk>

2 What personal data do I collect from you?

Personal data is information relating to an identifiable living individual. I collect data that I need to provide you with the services you have asked me to provide or tell you about.

2.1 Personal/contact information: this can include your name, contact address, email addresses, telephone numbers, previous accomplishments and available times for tuition, your child's name and your child's date of birth.

2.2 Digital information: IP addresses, and details of your interaction with my website and social media, should you engage with me through these channels.

2.3 I keep details of your payments. I may also require your bank details for any payments to you

2.4 Correspondence: Information relevant to your specific enquiries

2.5 Other: Any other information you choose to provide to me

3 When do I collect personal data?

I may collect personal identification information from Users in a variety of ways, including, but not limited to, when you enter into a contract with me, make enquiries about my services, visit my website and engage with me on social media.

3.1 from initial contact or further interactions. You will always know you are giving me information.

3.2 I keep comments on progress on paper in a file, which is constantly overwritten

3.3 Payment information is collected either through the cash receipt booklet or through the bank reference if paid through the bank by BACS payments.

4 What is my lawful basis for processing your data?

I only process personal data where I have a lawful basis for doing so. I may collect and process data when:

4.1 it is necessary for the performance of my contract with you;

4.2 it is necessary for the purposes of my legitimate interests as a business. In this case, I will do so in a way which might reasonably be expected from my relationship with you, and which does not impact materially on your fundamental rights, freedom and interests. I will not process your personal data on this basis if I believe your rights override mine. Instead, I may seek your specific consent, and/or another legal basis;

4.3 it is necessary for compliance with legal obligations;

4.4 I have your consent to do so, for example in relation to marketing by electronic means.

5 How will I use your personal data?

I will use your data in the following ways

5.1 to perform the contract I have with you to provide music tuition, 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.

5.1.1. The contract is based on acceptance of my conditions and provides ongoing lessons for a set fee. You agree the terms of the contract when you arrange to start learning with me. The contract may be with you for yourself or for a dependent.

5.1.2 A contract is also formed when you agree to be entered into an exam or competition following discussion with you. I use your data to prepare such entries.

5.2 To send emails regarding timetables, invoices, receipts, and any other information/requests required to run my business

5.3 To run a promotion, publicise an event,

5.4 To improve my website with the inclusion of any (agreed) activities

5.5 To send users information they agreed to receive about topics I think may be of interest to them

5.6 to reply to enquiries, complaints or suggestions. I need the information you supply to enable me to respond. 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;

5.7 to send you communications required by law or which are necessary to inform you about changes to the services I 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 me to comply with my legal obligations.

5.8 to protect my business financially and to protect my business from fraud or illegal activity. This processing is necessary for our legitimate interests by ensuring the proper management of our business and financial risks.

5.9 at the request of a client, I will communicate with other professionals such as schools to confirm client appointments in school time and student achievements.

5.10 I will only send marketing information to you by email if I have your consent – you have the right to withdraw your consent at any time. Please write, email or telephone me.

6 Who do I share your data with?

I may also share your data with third parties.

If this is necessary, I will provide only the information they need to perform the services I require. They will only use the data for the purposes I specify. I require third parties to maintain appropriate security to protect information from unauthorised access or processing. In some circumstances, I may need to share your personal data with other third parties (including legal or other advisers, regulatory authorities, courts and government agencies) to enable me to enforce my legal rights, or where such disclosure may be permitted or required by law. Unless I tell you otherwise, your data will not be processed outside the EEA. In particular we share your data with;

6.1 Account Tracker app (<https://grahamhaley.co.uk/privacy/>)

6.2 Examining Boards including

6.2.1 ABRSM (<https://us.abrsm.org/en/policies/website-privacy-policy/>)

6.2.2 Trinity College London (<https://www.trinitycollege.com/site/?id=3673>)

6.2.3 London College of Music (<https://www.uwl.ac.uk/academic-schools/music>)

6.3 Festival organisers (including Grantham Music Festival, Colsterworth Music Festival)

6.4 Other professionals such as schools with regards to examinations, lessons and any other relevant information

7 How long will I keep your data?

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

8 Data Security

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

9 Your rights

You may exercise your rights by contacting me via email. I aim to handle any requests within a reasonable period and, in any event, within one calendar month of the original request.

9.1 Right to information and access – You have the right to be informed about what personal data I collect about you, why, on what lawful basis and what your rights are. You also have a right to request access to the information that I hold about you, and to receive a copy of this information, along with other information which is generally contained in this Privacy Statement.

9.2 Right to rectification – You have the right to request that inaccurate personal data be rectified, or completed if it is incomplete.

9.3 Right to erasure and restriction – You have the right to ask us to limit or cease processing or erase information I hold about you in certain circumstances. When responding to such requests, I will tell you how such restrictions or deletions may affect my ability to fulfil my contract with you or otherwise affect your interests.

9.4 Right to object – You have the right to object to my using your information for direct marketing. You can also ask me to stop using your information, where I am processing it on the basis of my legitimate interest. I will do so unless I believe I have a legitimate overriding justification to continue processing your personal data.

9.5 Right to withdraw consent. If you have given me any specific consent to use your personal data, you have the right to withdraw it at any time. If you wish to tell me that you are withdrawing your consent, please email me at jwalkergale@gmail.com

10 Complaints

If you are unhappy with the way I process your personal data, please contact me. 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/>

11 Contact

Please contact me by email at jwalkergale@gmail.com

12 Updates

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

Last edited May 2018