

Ben England Music Ltd

Privacy notice

March 2021

Introduction

Ben England Music Ltd provides music directing and leadership, music teaching, online music-making, audio recording and mixing, and music technology support services. These include the setup, running and leadership of live-streamed choir and orchestra rehearsals, the creation of socially-distanced audio and video recordings and performances, and face-to-face music teaching and directing.

The purpose of this notice

The privacy of our service users matters to us, as our business philosophy is to facilitate the growth of a supportive community of musicians, and to maximise the mental health and wellbeing benefits of making music together. Trust in the appropriateness and security of our data handling processes is a key part of this.

This privacy notice therefore makes explicit:

- The types of personal data we collect
- How we use personal data
- The legal basis for our collection of personal data
- When we share personal data
- How we store and secure personal data
- How long we keep personal data for

Please read the policy carefully and contact us if you have any questions or concerns about our privacy practices.

What information do we collect?

We may collect personal data such as names, addresses, emails, and telephone numbers. That data will usually, although not exclusively, consist of:

- Email correspondence to and from service users and affiliates.

- Personal data provided to us in signing up for a paid service.
- Videos submitted to group recording projects.

Where possible we avoid collecting personal data through outsourcing of data storage to third party applications such as Patreon, PayPal, Mailchimp and Facebook. Please see the privacy policies of the aforementioned applications for further information about their handling of personal data.

How do we use personal information?

The purposes for which we collect and process personal data include:

- Personalisation of content, business information or user experience
- Set up, administration and provision of groups and services
- Events communication
- Carrying out polls and surveys
- Internal research and development

What legal basis do we have for processing your personal data?

The GDPR describes six possible legal grounds for the processing of personal data:

- consent
- contract
- legitimate interests
- vital interests
- public task
- legal obligation

We process personal data on the lawful basis of “legitimate interests”. For a detailed guide to the legal grounds for personal data processing, please visit <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>.

This lawful basis is valid on the following grounds:

- We use personal data in ways that would be reasonably anticipated, for example to build and communicate with communities and groups, to organise musical activities.
- Our personal data collection has minimal privacy impact and will not be shared with third parties without the express permission of the data subject (unless legally required).

- We recognise and care about protecting people's rights and interests, such as the right to be forgotten (see below).
- Data processing is necessary to achieve our business aims.
- Data processing is necessary to serve the individual interests of our service users.
- We cannot reasonably achieve the same results in another less intrusive way.

When do we share personal data?

We treat personal data confidentially and will not disclose or share it without the expressed request or permission of the data subject, unless required to by law.

Where do we store and process personal data?

Personal data storage on our UK premises is limited to the information provided by service users who sign up to paid services such as choirs and events. This is deleted when service users stop using those services, or at their request.

How do we secure personal data?

- Personal data is stored on our premises in locked and encrypted hard drive folders.
- Personal data stored on our premises is regularly reviewed, and any data pertaining to subjects who no longer use our services is deleted.
- Email communications are stored in reputable and secure cloud-based services such as Gmail, Spark Mail and Apple Mail.
- Computer equipment and devices are routinely kept locked to prevent unauthorised access, use, destruction or disclosure.
- Where possible, we ask our service users to give their personal data directly to reputable and secure third party applications and services such as PayPal, Patreon and Mailchimp, to minimise our handling of personal data.
- We commit to undertaking an annual security review of our data handling practices.
- We do not currently hold any personal data on physical media (e.g. paper forms) and will review our privacy notice and practices should that change.

How long do we keep your personal data for?

We will delete any personal data stored on our premises within 30 days if requested to do so by the data subject.

We will routinely delete any personal data relating to those who have stopped using our services.

Your rights in relation to personal data

Under the GDPR, we respect the rights of data subjects to access and control their personal data. We acknowledge particularly their rights to:

- Request copies of any data we hold relating to them
- Request correction and/or deletion of their personal data
- Withdrawal of consent (if processing data on condition of consent)
- Have their data transferred to a third party at their request
- Restrict or object to the ways in which we process their data
- Lodge a complaint with the Information Commissioner's Office about our data processing practices (helpline number below)

We will respond to all legal subject data requests within 30 days, providing satisfactory verification of the identity of the subject.

Please note that data subject rights may be limited, e.g. if fulfilling the data subject request may expose personal data about another person.

Linking to other websites / third party content

Where we link to external sites and resources from our website and social media pages this does not constitute endorsement, and we do not take any responsibility for the content (or information contained within) any linked website.

Contact details

Data protection officer
Dr Ana-Marie S England
ana@homechoir.uk

ICO Helpline

(+44) 0303 123 1113

We are committed to reviewing this notice and our practice annually.

This policy was last reviewed on: 27 March 2021
(date)

Signed: 

Date: 27 March 2021