



MUSIC HEROES

DATA PROTECTION POLICY

(TO BE READ BY STUDENTS AND TUTORS)

We will need to request information from parents about their child and our consultant tutors. Some of this will be personal data.

We take privacy seriously, and in accordance with the General Data Protection Regulation (GDPR), we will process any personal data according to the seven principles below:

1. We must have a lawful reason for collecting personal data, and must do it in a fair and transparent way. We will be clear about what data we are collecting, and why.
2. We must only use the data for the reason it is initially obtained. This means that we may not use a person's data to market a product or service to them that is unconnected to the reasons for which they shared the data with us in the first place.
3. We must not collect any more data than is necessary. We will only collect the data we need to hold in order to do the job for which we have collected the data.
4. We will not keep data any longer than needed. We must only keep the data for as long as is needed to complete the task it was collected for.
5. We must protect the personal data. We are responsible for ensuring that we, and anyone else charged with using the data, processes and stores it securely.
6. We will be accountable for the data. This means that we will be able to show how we are complying with the law.

PERSONAL DATA WE COLLECT FROM YOU:

Personal data or personal information includes any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Name and contact details – this includes your name, your child's, name, title, billing address, delivery address, email address and telephone numbers.
- Data of birth information (often required for exam entry).
- Payment information – this includes your bank account and/or payment card details.
- Information concerning SEND. We may ask for a copy of your child's EHCP (Education and Health Care Plan) if it would assist with the delivery of our tuition.

Unless we have told you otherwise in a specific privacy notice, we do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). The only exception to this is where you/your child may have specific disability needs which we need to be aware of in order to make reasonable adjustments and be able to perform our contract with you and comply with our obligations pursuant to social protection and equality laws - see above.

MY MUSIC STAFF

We use web-based programme “My Music Staff” to schedule lessons, record attendance, raise invoices and make lesson notes. Parents are set up as contacts and each student or family has its own secure profile. Name and contact details are required to set up new students. My Music Staff is GDPR compliant. Its Privacy Policy can be found here: <https://www.mymusicstaff.com/privacy-policy/> and is set out below:

KEEPING YOUR PERSONAL DATA UP TO DATE

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

WHEN A STUDENT TERMINATES LESSONS, THEY ARE MARKED AS ‘INACTIVE’ ON MY MUSIC STAFF. THEY WILL NOT LONGER RECEIVE EMAILS ABOUT EVENTS.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out in the tables below a description of what we do with personal data and why we do it. We have also identified what our legitimate interests are where appropriate.

General Data Protection Regulation GDPR

GAYLE KINSEY T/A MUSIC HEROES AND MUSIC HEROES LIMITED

Data Audit May 2022

Document	Data Recorded	Lawful / Legal Basis for Recording Data	Data Sharing	Data Storage	Data Retention	Data Destruction
Accounts / HMRC	E-mail addresses, Invoices for parents, Child’s name and booked in sessions, Business expenses including purchase receipts. Consultant payment details	Legal obligation required by HMRC In order to raise and settle invoices	On request by HMRC Not shared	Securely on Xero accounting software, password protected. Purchase receipts in secure office. Online on HSBC Payees list under business account	For at least 5 years after the 31 st January submission deadline of the relevant tax year	Documents either deleted or shredded after the required length of time.

Rental Contracts	Contract details between parent and Gayle Kinsey T/A Music Heroes . Child and Parent name, address and parent signature.	Insurance requirement. Legitimate business requirement to secure asset.	Not shared.	Securely on password protected MacBook hard drive.	For duration of rental.	Documents deleted after the required length of time
Consent Forms for the use of ICT	Child name and parent signature	Safeguarding requirement of some schools.	Document shared only with relevant school.	Only precedent documents are saved on Macbook. Hard copy signatures retained in a file in secure office at my home and copies with school.	Until lessons are terminated.	Documents deleted after the required period of time
Policies and procedures - acknowledgment of receipt	Consultant confirmation that policies have been read and understood. Consultant signatures and addresses.	Legitimate interest and contractual obligation.	Not shared.	Securely on file in secure office at my home.	Until no longer required.	Documents deleted after the required period of time.
Consultant information	Consultant training certificates/ records,	Legal obligation re DBS and legitimate business interest / staff training.	Certificates/ proof of qualification of tutors may be shared with schools when requested.	In consultants' file in secure office.	Until no longer required.	
Exam Entry	Student name, instrument and grade	Legitimate requirement of Exam board	With RSL (or other such exam board)	By RSL securely online	Refer to RSL data protection policy.	No physical document save for certificate which is handed to student

MARKETING

We may use your email address to send you information about our new events, products and services that may be of interest to your/child's tuition. A half-termly newsletter is sent out to active students. We have a legitimate interest in doing so to develop our events, products and services and to grow our business. You can tell us that you want to stop receiving marketing communications from us at any time by e-mailing gayle@musicheroes.co.uk.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

SHARING YOUR PERSONAL DATA

Other than as referred to above (Registers must be shared with our consultant tutors and names, date of birth, gender of child will be shared with exam boards for entry for instrumental examination), we will not share your personal data with third parties.

KEEPING YOUR PERSONAL DATA SAFE

We're committed to keeping your personal data secure and have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

HOW LONG WILL WE KEEP YOUR DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Updated March 2023