



Deal Music & Arts Ltd

49 Barton Mill Road

Canterbury, Kent CT1 1BP

Company Reg No. 4833202

Charity Reg No. 1100003

Privacy Policy & GDPR Processing Statement

We process personal data relating to our Friends and Supporters organisation, staff, volunteers, participants, event attendees, clients and customers, suppliers, and to members of the public who have requested information on the services we provide.

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

Whenever we need to collect any of your data, we will let you know at that point why we need to do so and what it will be used for, but this guide provides a useful overview of all of those situations and provides more detail on how we keep your data secure and up-to-date, how long we might hold it for, and what your rights are in relation to it.

This statement sets out the principles we apply when processing personal data and 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.

1. About us and our services	3
2. What personal data do we collect from you?	3
a. When do we collect personal data?	3
b. What is our lawful basis for processing your data?	3
3. Children and Young People	4
4. Taking, Storing, and Using images of participants	4
5. How will we use your personal data?	4
6. Who do we share your data with?	5
7. How long will we keep your data?	5
8. Data security	5
9. Your rights	6
10. Breaches	6
11. Complaints	6
12. Contact	7
13. Updates to this statement	7

1. About us and our services

Our business name is Deal Music & Arts Ltd, and we are a company incorporated in company registration number 4833202 and Registered Charity No. 1100003.

We provide educational services and training, produce events and we are a Data Controller for the purposes of current data protection legislation.

Our General Manager is responsible for our data protection policies:

W Cooper
The New Barn,
Mill Lane,
Eastry,
Sandwich,
CT13 0JW
policies@dealmusicandarts.com

2. 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. This may include:

- Personal/contact information: this can include your name, age, gender (where you have opted to provide this) contact address, email addresses, and telephone numbers.
- Photo/Video footage
- Gift aid declarations
- Payment and account information
- Digital information: IP addresses, and details of your interaction with our website and social media, should you engage with us through these channels.
- We use cookie technology when a person visits our website to collect and analyse anonymised data on how many people have visited, what pages they have looked at, and other statistical information.
 - We use a pop-up banner to let users know about this on their first visit, and they can at any time disable cookies in their browser if they do not wish their (anonymised) data to be tracked.
 - You can find out more about cookies at allaboutcookies.org.
- Correspondence: postal and email information relevant to your specific enquiries.
- Queries: details relating to any complaint or legal query you have made to us.
- Other: any other information you choose to provide to us.

a. When do we collect personal data?

We will collect information about you when you: purchase from us; enter into a contract with us; make enquiries about our services; visit our website and engage with us on social media; participate in or attend events.

b. What is our lawful basis for processing your data?

We only process personal data where we have a lawful basis to do so. We may collect and process your personal data when:

- it is necessary for the performance of contracts with you;
- it is necessary for us to provide services to you;
- 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;
- our events are ticketed and we need to collect data on the person booking (name and email) in order to allow you access to the event and to send you a confirmation of your reservation/purchase. This data will

only be used for administering your access to the event(s) for which you have booked and will not be used to send you marketing/promotional messages from the group unless you have also provided your consent to receive these.

- it is necessary for compliance with legal obligations;
- 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. Please also see Your Rights, below.

3. Children and Young People

We process information about children and young people who participate in Deal Music & Arts programmes. This data will be obtained and maintained strictly in accordance with current data protection regulations.

4. Taking, Storing, and Using images of participants

Where images (principally photo and video) of participants and attendees at Deal Music & Arts events and activities have been taken by Deal Music & Arts staff or their agents on behalf of the organisation:

- **Use of participant images**
Unless the participant/ attendee or their parent or guardian has specifically requested otherwise Deal Music & Arts reserves the right to use and store all images taken on its behalf for information, marketing and promotional purposes.
- **Security of participant images**
The archive of images taken by and on behalf of Deal Music & Arts are held on a secure system and can only be accessed by Deal Music & Arts, authorised staff and Trustees or anyone commissioned by DMA to take images.

Our policy does not cover images taken by parents, relatives, friends or other members of the public for their own purposes.

5. 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 fulfil a purchase you have made from us. We need the information you complete for delivery or supply to fulfil your purchase;
- 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 contact us if you wish to do so.
- 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 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.

6. 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
- Payment processors

We may share your data with third parties, in order to carry out some of our activities described above. For example, to send you mailings, to obtain DBS certificates, to collect direct debit payments and to manage surveys, campaigns and events.etc.

We also engage external IT consultants and suppliers to provide support and development services in relation to our systems and databases. These consultants may from time to time need to access information which may contain personal data for the purposes of systems testing and development.

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. We will make sure any third parties we use are reputable, secure, and process your data in accordance with your rights under the current data protection legislation.

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.

7. 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.

Our data retention policy is to review all data held on individuals at least every two years and remove data where we no longer have a legitimate reason to keep it. Where you have withdrawn your consent for us to use your data for a particular purpose, e.g. unsubscribed from a mailing list, we may retain some of your data for up to two years in order to preserve a record of your consent having been withdrawn.

8. 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, and we maintain a company Information Security Policy.

Our website may include links to, or content embedded from third party web service providers. Please note that we have no control over these third-party websites and therefore cannot accept responsibility for the protection and privacy of any information which you provide whilst visiting such third-party websites and such websites are

not governed by this privacy policy. It is your responsibility to exercise caution and note the terms of privacy policies relevant to any such third-party websites.

If you have reason to believe that your interaction with us is not secure, please notify us of the problem immediately by contacting us using the details below.

9. Your rights

The law gives you certain rights in relation to your data. We are committed to respecting individuals' rights.

Your rights include:

- **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 Policy 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 policy.

We will provide the information without charge, but we may charge a reasonable fee for the administrative cost of providing the information where the request for information is unfounded, repetitive or excessive.

- **Right to rectification**

You have the right to request that inaccurate personal data be rectified, or completed if it is incomplete. If we have disclosed your personal data to any third parties, we will also inform those third parties of any correction to your personal data where possible.

- **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 can 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 ask us to stop contacting you with direct marketing**

You can ask us to stop contacting you for direct marketing purposes.

- **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.

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.

10. Breaches

In the event of any breach of our systems impacting on the security of a member's or any other individual's personal data, we will inform the affected member(s) or individuals at the earliest opportunity describing the nature of the breach, the possible consequences and the measures being taken to remedy the situation in accordance with our procedures and applicable law. Where necessary, we will notify the Information Commissioner's Office in accordance with the law.

11. 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/>

12. Contact

If you have any questions about this policy, or you wish to exercise any of your rights, please email us at policies@dealmusicandarts.com or write to our General Manager at the details provided above.

13. 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 January 2023