

PRIVACY STATEMENT

Personal data and privacy statement

I process personal data relating to clients and customers, and to those who are interested in the services I provide. I am committed to complying with my legal obligations in respect of data protection and privacy. This statement sets out the principles I apply when processing personal data. This statement describes the types of personal data I may collect about you. This statement 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. This statement also informs you of your rights and how you can contact me.

About me and my services

I am a sole trader. I provide musical education, composition and performance services. I am a Data Controller for the purposes of current data protection legislation.

What personal data do I collect from you?

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

- **Personal/contact information:** this can include your name, contact address(es), email address(es), telephone number(s) and any other contact details (e.g. social media handles), as well as the names and dates of birth of any relevant children in your care (e.g. child students).
- **Digital information:** IP addresses and details of your interaction with my websites and social media, should you engage with me through these channels.
- **Correspondence:** information relevant to your specific enquiries.
- **Other:** any other information you choose to provide to me.

When do I collect personal data?

I will collect information about you when you enter into a contract with me, make enquiries about my services, visit my website or engage with me on social media.

What is my lawful basis for processing your data?

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

- it is necessary for the performance of contracts with you;
- it is necessary for the purposes of my legitimate interests as a business. In these cases 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;
- it is necessary for compliance with legal obligations;
- I have your consent to do so, for example in relation to marketing by electronic means.

Please see below for more detailed information about how I will use your data and on what basis. If you have any concerns about my data processing please contact me. Please also see your rights, below.

How will I use your personal data?

I may process the information I collect about you:

- to perform any contract I 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 respond to any other enquiries or complaints. I need the information you supply to enable me to respond.
- to protect my business from fraud and other illegal activities. This processing is necessary for my legitimate interests by ensuring the proper management of my business and financial risks.
- to provide you with information by post (or by email, with your consent) about other products and services I offer similar in nature to those you currently receive or have previously asked about. Information I 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. 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.
- 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.

- to administer my website, and send you survey and feedback requests to help improve my 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 my services, which is a legitimate interest of my business. I have a legitimate interest to do so as this helps make my products or services more relevant to you. You are free to opt out of receiving these requests from me at any time by contacting me.

Who do I share your data with?

In some circumstances I may need to share your data with the following:

- My accountants/auditors.
- Accounting software company.
- Direct debit company.
- Your (or your child's) school or music school.
- Examination boards.

I may also share your data with third parties, such as my cloud-based back-up service and mailing list provider to support the efficient running of my business. 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.

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.

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.

Your rights

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

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. This Privacy Statement is the key document I use to inform you about this. 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.

Right to rectification

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

Right to erasure and restriction

You have the right to ask me 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 contracts with you or otherwise affect your interests.

Right to object

You have the right to object to me 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.

Right to withdraw consent

If you have given me any specific consent to use your personal data, you have the right to withdraw it any time. If you wish to tell me that you are withdrawing your consent, please contact me.

Complaints

If you are unhappy with the way I am 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>

Contact

If you have any questions about this policy, or you wish to exercise any of your rights, please contact me via the contact form at www.davebrazier.com, by emailing dave@davebrazier.com or by calling 07732 071388.

Updates to this statement

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 post or email. Please check my website to stay up to date.

Last updated May 2018