



Flutterby Music Privacy Notice

The General Data Protection Regulations (GDPR) come into force on 25th May 2018 and requires that all business issue a privacy notice to all clients and contacts, regarding the data held about the individual.

1. Flutterby Music data information

Flutterby Music and Rachel Ramsay are registered with the Information Commissioner's Office. Rachel Ramsay is the 'controller' of your data. Rachel can be contacted on 0772 4466064, Rachel@flutterbymusic.co.uk and by post at 2 Ealing Close, Chatham, ME5 8YJ.

2. Data Held

- 1) I hold personal contact data necessary to provide the services you engage me to provide. This information is held on a legal contractual basis. I may also keep secure notes about each student's progress (if appropriate) in order to plan progression accordingly. From time to time there may also be a legal basis of legitimate interest to communicate with you for the mutual benefit of yourself and Flutterby Music.
- 2) I also hold photographic, video and audio images for which I have been given a 'clear affirming act' of consent from you. The legal basis for holding this data is consent. You have the right to withdraw this consent at any time. The consent has been given on registration forms, or on specific image release forms. Rest assured that if consent has not been given, any images of yourself or your child will not be used or stored.

3. What I do with it

- 1) Contact information is used for invoicing, record keeping, and communicating with you about my services and other information you need to know.
- 2) Invoices are processed by an online accounting system and your details are entered onto this system. This system is password protected by me. However, this system is deemed to be a 3rd party. This 3rd party is based in Canada. The EU has deemed Canada to have satisfactory laws to comply with GDPR.
- 3) Some information will be shared with examination boards if the student wishes to enter for exams (piano teaching).
- 4) Photographic, video and audio images will only be used for the purposes for which consent was given. It will not be passed to any 3rd party unless further consent has been sought and freely given. Flutterby Music will always be specific as to the 3rd party involved in this case.
- 5) All reasonable steps are taken to ensure your data is processed and stored securely.

4. How long will I keep it?

- 1) I will keep Contractual Information for a minimum of 6 years.
- 2) I will keep photographs, video and audio recordings, for which a 'clear affirming act' of consent has been given, indefinitely. If consent is withdrawn, these images will be deleted and all reasonable steps taken to remove them from any promotion they have been used within. In the case of printed materials, I may not be able to trace all copies in circulation.

5. Individual Rights to the Data Held

- 1) If you wish to change the information I hold about you, please contact me directly.
- 2) You have the right to withdraw consent for Flutterby Music to use and store photographs, video and audio recordings of your child at any time. Please contact me should you wish to do so.

You also have general rights, as per the Data Protection Act:

- 3) You have the right of access to a copy of the information comprised in your personal data
- 4) You have the right to object to processing that is likely to cause or is causing damage or distress
- 5) You have the right to prevent processing for direct marketing
- 6) You have the right to object to decisions being taken by automated means
- 7) You have the right in certain circumstances to have inaccurate personal data rectified, blocked, erased, or destroyed
- 8) You have the right to claim compensation for damaged caused by a breach of the Act.

6. Reporting a breach of rights or security

If you believe your data rights or security have been breached, please contact Flutterby Music immediately.