



# Sound and Music

## Data Protection Policy 2018

*Title: Sound and Music Data Protection Policy April 2018*  
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## PART 1. Data Protection Policy Overview

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In order to operate efficiently, Sound and Music collects information about the people it works with, those who use its services and products and those who sign up to the organisation's communications.

This data may include personal data which is collected and used in order to improve Sound and Music's work, to inform planning and developments and to communicate and deliver national change.

Sound and Music collects information from a range of individuals, and this **Data Protection Policy and Privacy Policy** outlines how and why that data is used, how it is stored and how it is protected. Sound and Music collects different types of data to inform and improve its services and products, to campaign and lobby for change and to update users and audiences on activity and opportunities.

This **Data Protection Policy** has been revised and developed in line with the new [General Data Protection Regulation \('the GDPR'\)](#) which comes into force in the UK from the 25<sup>th</sup> May 2018. The GDPR aims to protect all individuals' personal and sensitive data and replaces the previous Data Protection Act 1998 ('the DPA').

There is more information about the [GDPR and its 'five principles' here](#).

Sound and Music is committed to reviewing this policy annually.

This process will be led by its registered [Data Protection Officer](#), supported by the [Chief Executive](#) and [Board of Trustees](#).

## PART 2. Definitions

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'Personal data' is [defined under GDPR](#) as being ***"any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier (including cookies) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person"***.

It can include a variety of information, including names, addresses, contact details, age, ethnicity, gender, financial details and other personal details. The GDPR also specifically addresses the data and rights of living individuals.

It may also include identifying collateral such as photographs and biographies.

Sound and Music can hold personal data for a limited timeframe, as long as that timeframe is clear to the individuals and Sound and Music is able to indicate a 'legitimate basis' for holding the data, as outlined below.

Under the GDPR potentially 'sensitive personal data' is called 'special category data' and this is defined as "data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation".

## PART 3. Sound and Music's core commitments

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In creating this updated **Data Protection and Privacy Policy**, Sound and Music has:

- Undertaken training with the Senior Management and the wider executive team
- Instated an internal Steering Group to oversee this work
- Sought qualified external advice and legal support
- Registered as a Data Controller with the [Information Commissioner's Office](#)
- Assigned an internal [Data Protection Officer](#)

Sound and Music commits to:

- Gain consent from all individuals on all mailing lists and databases via 'opt in' methods – by May 2018
- Take all reasonable steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure – by May 2018
- Secure the government led Cyber Essentials Certificate and develop an internal IT Security Policy – by September 2018
- Review all third party relationships and wider data protection compliance – by October 2018
- Ensure that all members of the organisation are sufficiently trained and that those managing or handling personal data understand the responsibilities for upholding this **Data Protection and Privacy Policy** and best practice – by December 2018
- Undertake a comprehensive audit of all data held by the organisation, improving processes and storage in line with or exceeding legal requirements – by April 2019
- Regularly undertake an assessment, evaluation and review of this policy and all related processes – by April 2019 then annually
- Document all training, meetings, improvements and decisions made in regards to the organisation's policy for the collection, storage and use of data – by May 2019

## PART 4. Data collected by Sound and Music

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Sound and Music works with many different individuals and collects different types of information, as a 'Controller' of data ([see GDPR definition here](#)).

Sound and Music can break down the individuals from whom it collects data, and how and what data it collects, into eight categories, as outlined below:

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| Data subject   | How data is collected?  | What data is collected?   | Lawful basis for processing  | How is the data used?  |
|--|---|---|--|--|
| <p><b>Applicants to Sound and Music programmes and opportunities</b> (which includes composers and young composers, artists, performers, educators and children and young people, for more information on this specific group please also see our <a href="#">Child Protection Policy</a>)</p> | <p>In two ways:</p> <ul style="list-style-type: none"> <li>• In an Application Form</li> <li>• In an Equal Opportunities monitoring form</li> </ul> | <p><b>Application Form:</b></p> <ul style="list-style-type: none"> <li>• Personal data including name, location, age, education and contact details</li> <li>• Sensitive personal data including gender, ethnicity, sexual orientation, disability and health</li> </ul> <p><b>Equal Opportunities monitoring form</b></p> <ul style="list-style-type: none"> <li>• Includes data about age, location, socio-economic background, ethnicity, gender, disability and sexual orientation</li> </ul> | <p><b>Application Form:</b></p> <ul style="list-style-type: none"> <li>• Applicants give Sound and Music <b>consent</b> to hold personal and sensitive personal data for the duration of the application process, for the purposes of communication and the selection process itself</li> </ul> <p><b>Equal Opportunities monitoring form:</b></p> <ul style="list-style-type: none"> <li>• Collected in order to meet a <b>contractual obligation</b> to Arts Council England regarding their support of our work. For more information see the Arts Council's <a href="#">Standard Terms and Conditions for National Portfolio Organisations</a> (Section 6) and our <a href="#">Equality, Diversity and Inclusion Policy</a></li> </ul> | <p><b>Application Form:</b></p> <ul style="list-style-type: none"> <li>• To enable and inform the shortlisting and selection of participants, and to meet any access requirements, in line with Sound and <a href="#">Music's Equality, Diversity and Inclusion Policy</a> and Action Plan</li> </ul> <p><b>Equal Opportunities monitoring form:</b></p> <ul style="list-style-type: none"> <li>• In order to measure progress this information is anonymised and aggregated for monitoring, reporting, evaluating and campaigning purposes</li> </ul> |
| <p><b>Participants in Sound and Music's programmes</b></p>   | <p>In two ways:</p> <ul style="list-style-type: none"> <li>• In an Application Form</li> <li>• Via email and/or Typeform</li> </ul>                 | <p><b>Application Form:</b></p> <p>As outlined above</p> <p><b>Marketing collateral:</b></p> <ul style="list-style-type: none"> <li>• Includes data such as name,</li> </ul>  | <p><b>Application Form:</b></p> <ul style="list-style-type: none"> <li>• As outlined above</li> <li>• Furthermore, successful applicants give Sound and Music <b>consent</b> to hold</li> </ul>  | <p><b>Application Form:</b></p> <ul style="list-style-type: none"> <li>• As outlined above</li> <li>• Anonymised and aggregated for monitoring, reporting, evaluating and campaigning purposes, in</li> </ul>  |

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|  |  | location, web links, social links, images and audio and visual material   | personal and sensitive data for monitoring, reporting, evaluating and campaigning purposes<br><b>Marketing collateral:</b> <ul style="list-style-type: none"><li>• Sound and Music has a <b>legitimate interest</b> in capturing this information in order to promote, profile and showcase those participating on our programmes</li></ul>  | line with Sound and Music's <a href="#">Equality, Diversity and Inclusion Policy</a> and Action Plan<br><b>Marketing collateral:</b> <ul style="list-style-type: none"><li>• To inform effective delivery of agreed promotional activity</li><li>• To create marketing materials and content</li><li>• To meet any access requirements</li></ul>   |
| <b>Featured composers and artists</b> (which includes anyone profiled on any of our online platforms or marketing content including on the British Music Collection, Minute of Listening, and The Sampler) | In three ways: <ul style="list-style-type: none"><li>• Via online subscription</li><li>• Via online registration forms</li><li>• Via email and/or Typeform</li></ul> | <b>Online subscription:</b> <ul style="list-style-type: none"><li>• Includes data such as name, location, age and contact details</li></ul> <b>Online registration:</b> <ul style="list-style-type: none"><li>• Includes data such as name, location, age, gender, economic and profession and unique preferences</li></ul> <b>Marketing collateral:</b> <ul style="list-style-type: none"><li>• Includes data such as name, location, contact details, web links, social links, images and audio and visual material</li></ul> | <b>Subscribers or registrants:</b> <ul style="list-style-type: none"><li>• Give Sound and Music <b>consent</b> for to hold their personal data for the purposes of profiling their work or activity or for the purposes of communication</li></ul> <b>Marketing collateral:</b> <ul style="list-style-type: none"><li>• Sound and Music has a <b>legitimate interest</b> in capturing this information in order to promote, profile and showcase those working on our programmes</li></ul> | <b>Online subscription and registration:</b> <ul style="list-style-type: none"><li>• To inform and improve platforms and services</li><li>• To enable users to create, contribute and access content</li><li>• To ensure a relevant and bespoke experience for users</li><li>• To communicate with users and participants</li></ul> <b>Marketing collateral:</b> <ul style="list-style-type: none"><li>• To inform effective delivery of agreed activity</li><li>• To create marketing materials and content</li></ul> |
| <b>Contributors and Subscribers</b> (which includes users creating profiles on any of Sound and Music's online platforms,  | In two ways: <ul style="list-style-type: none"><li>• Via online subscription</li><li>• Via online registration</li></ul>   | <b>Online subscription:</b> <ul style="list-style-type: none"><li>• Includes data such as name, location, age, economic,</li></ul>  | <ul style="list-style-type: none"><li>• Contributors and subscribers give <b>consent</b> for Sound and Music to hold their personal data for the purposes of</li></ul>   | <b>Online subscription and registration:</b> <ul style="list-style-type: none"><li>• To inform and improve platforms and services</li></ul>  |

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| subscribers to newsletters and other e-communications)                                      |   | professional and contact details<br><b>Online registration:</b> <ul style="list-style-type: none"> <li>Includes data such as name, location, age, gender, economic and profession and unique preferences</li> </ul>  | communication  | <ul style="list-style-type: none"> <li>To enable users to create, contribute and access content</li> <li>To ensure a relevant and bespoke experience for users</li> <li>To communicate with users and participants</li> <li>To support monitoring, evaluation and campaigning</li> </ul>   |
| <b>Donors</b> (which includes individual donors and individuals working for funding bodies) | <b>Individual donors</b> <ul style="list-style-type: none"> <li>Via PayPal</li> </ul> <b>Individuals working for funding bodies</b> <ul style="list-style-type: none"> <li>Via email</li> </ul> | <b>Individual donors</b> <ul style="list-style-type: none"> <li>Name, address and email</li> </ul> <b>Individuals working for funding bodies</b> <ul style="list-style-type: none"> <li>Name and work contact details, email address, telephone number and professional title</li> </ul> | <ul style="list-style-type: none"> <li>Individual donors and individuals working for funding bodies give Sound and Music <b>consent</b> for the purpose of claiming gift aid and for the purposes of communication, or <b>Consent</b> to regular gifts i.e. monthly donations</li> </ul> | <b>Individual donors</b> <ul style="list-style-type: none"> <li>For the purpose of claiming gift aid</li> <li>To ensure that donors are contacted with the most appropriate, timely and relevant communication</li> <li>To better understand the background of the people who support Sound and Music and assist the organisation in making appropriate requests to supporters</li> <li>To monitor and evaluate donors experience</li> </ul> <b>Individuals working for funding bodies</b> <ul style="list-style-type: none"> <li>Contained within CRM system for the purpose of managing relationship and correspondence with funding body</li> </ul> |

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| <p><b>Applicants for employment or Board membership</b></p> | <p>In two ways:</p> <ul style="list-style-type: none"> <li>• In an Application Form</li> <li>• In an Equal Opportunities monitoring form</li> </ul> | <p><b>Application form:</b></p> <ul style="list-style-type: none"> <li>• Personal data including name, location, age , education, and contact details</li> <li>• (voluntary question in the application form) Sensitive personal data including gender, ethnicity, disability, socio-economic background, health and sexual orientation</li> </ul> <p><b>Equal Opportunities monitoring form:</b></p> <ul style="list-style-type: none"> <li>• Includes data about age, location, socio-economic background ethnicity, gender, disability and sexual orientation</li> </ul> | <p><b>Application form:</b></p> <ul style="list-style-type: none"> <li>• Applicants give Sound and Music <b>consent</b> to hold personal and sensitive data for the duration of the selection process</li> <li>• Sound and Music also has a <b>legitimate interest</b> in holding forms of personal data that allow Sound and Music to communicate with applicants as part of the selection process</li> </ul> <p><b>Equal Opportunities monitoring form:</b></p> <ul style="list-style-type: none"> <li>• This information is collected as part of Sound and Music’s <b>contractual agreement</b> and requirements in order to report on progress, you can find out more about this in our <a href="#">Equality, Inclusion and Diversity Policy</a></li> </ul> | <p><b>Application form:</b></p> <ul style="list-style-type: none"> <li>• To enable the shortlisting and selection of candidates and to meet any access requirements, in line with Sound and Music’s <a href="#">Equality, Diversity and Inclusion Policy</a> and Action Plan</li> </ul> <p><b>Equal Opportunities monitoring form:</b></p> <ul style="list-style-type: none"> <li>• In order to measure progress this information is anonymised and aggregated for monitoring, reporting, evaluating and campaigning purposes</li> </ul> |
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| <p><b>External advisers and suppliers</b><br/>(which includes partner organisations, steering group members, external selection panel members, advisory board members, patrons, freelance workers and other external providers)</p> | <ul style="list-style-type: none"> <li>• Via contracts and agreements</li> </ul> | <ul style="list-style-type: none"> <li>• Personal data including name, location, contact and payment details</li> </ul> | <ul style="list-style-type: none"> <li>• Sound and Music has a <b>legitimate interest</b> in holding personal data relating to external advisers and suppliers, which is to facilitate efficient communication with them</li> <li>• In some cases Sound and Music may hold such data in order to fulfil <b>contractual obligations</b></li> </ul> | <ul style="list-style-type: none"> <li>• To ensure effective communication</li> <li>• To set up payment processes and contractual agreements</li> </ul> |
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## PART 5. How data is stored and who has access to it

Sound and Music stores different types of data, for different time periods.

Below is an overview of how long data is stored for and the intended usage:

| Category of individual   | How stored and for how long   | Who has access  |
|--|---|---|
| <p><b>Applicants to Sound and Music programmes</b><br/>(which includes composers and young composers, artists, performers, educators and children and young people, for more information on this specific group please also see our <a href="#">Child Protection Policy</a>)</p> | <p><b>Application Form:</b></p> <ul style="list-style-type: none"> <li>• Stored on Typeform platform, then downloaded on to Sound and Music’s secure server following the closure of the application period, and deleted from Typeform</li> <li>• Forms are also shared digitally with any external panellists, who are contractually required to keep the data secure and to delete the forms after their work for the organisation is completed</li> <li>• No longer than 6 months after the end of the project</li> </ul> <p><b>Equal Opportunities monitoring form</b></p> <ul style="list-style-type: none"> <li>• Separated at point of submission from Application Form</li> <li>• As non-identifiable data</li> </ul> | <p><b>Application Forms:</b></p> <ul style="list-style-type: none"> <li>• Named Sound and Music team members</li> <li>• Named members of the external shortlisting panel</li> </ul> <p><b>Equal Opportunities monitoring form</b></p> <ul style="list-style-type: none"> <li>• All members of the organisation</li> </ul> |
| <p><b>Participants in Sound and Music’s programmes</b></p>   | <p><b>Application Form:</b></p> <ul style="list-style-type: none"> <li>• Stored on Typeform platform, then downloaded on to Sound and Music’s secure server following the closure of the application period, and deleted from Typeform</li> <li>• For up to a two year period following the final evaluation of the participant’s project</li> </ul>  | <p><b>Application Forms:</b></p> <ul style="list-style-type: none"> <li>• As outlined above</li> </ul> <p><b>Marketing collateral:</b></p> <ul style="list-style-type: none"> <li>• Assigned Creative Project Leaders</li> <li>• Head of Artist Development</li> </ul>  |

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|  | <p><b>Marketing collateral:</b></p> <ul style="list-style-type: none"> <li>• Typeform or Google Drive</li> <li>• Sound and Music's secure server</li> <li>• For up to a two year period, unless otherwise requested by the individual</li> </ul>  | <ul style="list-style-type: none"> <li>• Head of Digital, Marketing and Communications</li> <li>• Marketing and Insight Executive</li> <li>• Communication and Sales Coordinator</li> <li>• Administrator</li> </ul>  |
| <p><b>Featured composers and artists</b> (which include anyone profiled on any of our online platforms or marketing content including on the British Music Collection, Minute of Listening, and The Sampler)</p> | <p><b>Online subscriptions:</b></p> <ul style="list-style-type: none"> <li>• Mailchimp</li> <li>• For up to a five year period, unless otherwise requested by the individual</li> </ul> <p><b>Online registration:</b></p> <ul style="list-style-type: none"> <li>• Individual platforms</li> <li>• For up to a two year period, unless otherwise requested by the individual</li> </ul> <p><b>Marketing collateral:</b></p> <ul style="list-style-type: none"> <li>• Typeform or Google Drive</li> <li>• Sound and Music's secure server</li> <li>• For up to a two year period, unless otherwise requested by the individual</li> </ul> | <p><b>Online subscriptions:</b></p> <ul style="list-style-type: none"> <li>• Assigned Creative Project Leader</li> <li>• Head of Digital, Marketing and Communications</li> <li>• Marketing and Insight Executive</li> <li>• Communication and Sales Coordinator</li> </ul> <p><b>Online registrations:</b></p> <ul style="list-style-type: none"> <li>• As outlined above</li> </ul> <p><b>Marketing collateral:</b></p> <ul style="list-style-type: none"> <li>• Assigned Creative Project Leaders</li> <li>• Head of Artist Development</li> <li>• Head of Digital, Marketing and Communications</li> <li>• Marketing and Insight Executive</li> <li>• Communication and Sales Coordinator</li> <li>• Administrator</li> </ul> |
| <p><b>Contributors and Subscribers</b> (which include users creating profiles on any of Sound and Music's online platforms, subscribers to newsletters and other e-communications)</p>                           | <ul style="list-style-type: none"> <li>• <b>As outlined above</b></li> </ul>  | <ul style="list-style-type: none"> <li>• <b>As outlined above</b></li> </ul>  |
| <p><b>Donors</b> (which include individual donors and individuals working for funding bodies)</p>  | <ul style="list-style-type: none"> <li>• PayPal</li> <li>• Salesforce</li> <li>• Mailchimp</li> </ul>   | <ul style="list-style-type: none"> <li>• Head of Development</li> <li>• Individual Coordinator</li> <li>• Communications and Sales Coordinator</li> </ul>   |

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|  | <ul style="list-style-type: none"> <li>• For up to a five year period, unless otherwise requested by the individual</li> </ul>  |   |
| <b>Applicants for employment or Board membership</b>   | <p><b>Application Form:</b></p> <ul style="list-style-type: none"> <li>• Typeform</li> <li>• No longer than 6 months after end of recruitment process</li> </ul> <p><b>Equal Opportunities monitoring form</b></p> <ul style="list-style-type: none"> <li>• Separated at point of submission from application form</li> <li>• As non-identifiable data</li> </ul> | <p><b>Application Form:</b></p> <ul style="list-style-type: none"> <li>• External HR Consultant</li> <li>• Chief Executive</li> <li>• Named Sound and Music team or board members</li> <li>• Administrator</li> <li>• Executive Assistant</li> </ul> <p><b>Equal Opportunities:</b></p> <ul style="list-style-type: none"> <li>• All members of the organisation</li> </ul> |
| <b>External advisers and</b> (which includes partner organisations, steering group members, external selection panel members, advisory board members, patrons, freelance workers and other external providers) | <p><b>Contracts and agreements:</b></p> <ul style="list-style-type: none"> <li>• Sound and Music's secure server</li> <li>• For up to a five year period, unless otherwise requested by the individual</li> </ul>   | <p><b>Contracts and agreements:</b></p> <ul style="list-style-type: none"> <li>• Senior Management Team</li> <li>• Chief Executive</li> <li>• Named Sound and Music team members</li> </ul>   |

## PART 6. Privacy Policy

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Sound and Music complies with the 'Lawfulness, Fairness and Transparency' principle outlined in the GDPR, by providing data subjects with the following **Privacy Policy** which is clearly available across all of its platforms and websites.

Sound and Music is committed to protecting your personal information. We want our services to be safe and enjoyable environments for everyone. This section answers some important questions about how we can collect, use and protect your personal details.

When you interact with Sound and Music we sometimes receive personal information about you. For example, if you write to us or sign up to a newsletter, you might tell us who you are, how we can contact you, where you live and what you think of us.

### **Information we may collect**

We collect personal data about:

- Donors
- Applicants to employment and board
- Contributors and subscribers
- Participants in Sound and Music's programmes
- Composers and artists
- External advisers and suppliers

The personal data we collect might include name, date of birth, email address, postal address, and telephone number, and we may also collect anonymised Equal Opportunities monitoring data which includes information about protected characteristics and socio-economic background.

### **How we collect your information**

Across Sound and Music's platforms the organisation may collect and process the following data about you:

- Information that you provide by filling in forms on our websites; this includes information provided at the time of registering to use our site, subscribing to our services, posting material and requesting further services
- We may also ask you for information when you report a problem with our site
- If you contact us, we may keep a record of that correspondence
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them
- Details of your visits to platforms including but not limited to traffic data, location data, devices and other behavioural data

### **Why we collect your information**

We collect information for the purposes set out in this policy. There are a number of lawful bases for our data processing, depending on the activity (see Part 4 of this document).

These lawful bases include:

- Your provision of consent for us to process your personal data for a specific purpose
- processing which is necessary for the performance of a contract to which you are a party (if you fail to provide this information we may be unable to perform the contract)
- processing which is necessary for compliance with our legal obligations
- processing which is necessary for the purpose of the legitimate interest pursued by us or a third party, except where your rights as a data subject override our legitimate interest

### **How we use your information**

When using Sound and Music's platforms you authorise us to use your personal information for the following purposes, as outlined above in this **Data Protection Policy**:

- To the extent reasonably necessary to provide the services which are available through the website by us or our partners
- To enable us to review, develop and improve our services and provide you and other users with relevant information about our services (e.g. through a newsletter or a news alert)
- To personalise the way Sound and Music content is presented to you (e.g. if you tell us your postcode we may use this information to customise our communications with you)

### **Third Parties**

Sound and Music only works with third parties who are fully GDPR compliant.

We may share personal data with the following third parties:

- [Mailchimp](#)  
[Salesforce](#)  
[PayPal](#)  
[WooCommerce](#),  
[Google](#) (for use of Google Drive)  
[Dropbox](#)  
[Eventbrite](#)
- With the explicit consent of participants in our programmes, we may also share their personal data with organisations we are partnering with in order to deliver those programmes
- Sound and Music may share your personal information with third parties for marketing purposes in accordance with **Your Preferences**
- If you do not want us to share your personal data with any third party for marketing purposes, please let us know using the contact details [Contact Us](#) or by updating **Your Preferences** on the relevant platform

Sound and Music may need to provide your information to freelance contractors and suppliers who provide services on our behalf, to the extent necessary to enable you to receive those services.

If you make a payment or donation to us we will need to share your information with our payment processor. By paying via our payment processor you agree to accept their **Terms and Conditions** for the use of their services, including their **Privacy Policy**.

Sound and Music strongly suggest that you read their **Privacy Policy** when using their service as we are not responsible for data you share with them. Sound and Music may also need to disclose your information if required to do so by law or as expressly permitted under applicable data protection legislation.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have individual **Privacy and Cookies Policies** and that Sound and Music does not accept any responsibility or liability for these policies.

Please check these policies before you submit any personal data to these websites.

#### **How long we keep your information for**

Sound and Music keeps your information for no longer than is necessary. We will retain your information for any period required by law, for example for compliance with HMRC and/or employee requirements. Where we are not under a legal obligation to retain your information, the organisation has determined what is necessary by reference to the lawful basis for processing set out above and our legitimate interests please see the table above for further information.

If you have any questions about how long we keep your information, please [Contact Us](#)

#### **How we protect your information**

Sound and Music takes appropriate technical and organisational measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used. Sound and Music works with an external IT Support organisation which have the ISO27001 security standards in place which protect your information, as part of this policy we will be registering with the government led Cyber Essentials Certificate to ensure that our systems compile with network changes, IT practices and with the implementation of relevant security procedures.

Sound and Music uses a secure service when you make a donation through our website, via a virtual gateway operated by PayPal or Woocommerce.

You should be aware that the use of the Internet is not entirely secure and although Sound and Music will do our best to protect your personal data we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet. Any transmission is at your own risk.

Once we have received your information, Sound and Music will use strict procedures and security features such as encryption to try to prevent unauthorised access.

#### **Your data protection choices**

Subscribers can manage all their subscription options, including email notification preferences across Sound and Music's platforms, under Your Preferences, within their subscriber account settings. For example, should you wish, you can 'opt in' or 'opt out' of receiving direct marketing from us at any stage by deselecting the relevant box on your options page and saving the changes.

Sound and Music will not disclose your personal information to third parties for advertising or marketing purposes unless you specifically agree.

## Security

Sound and Music has security measures in place to ensure as far as is reasonably possible that your personal information is protected and kept confidential. However, by submitting your personal information to us, you acknowledge that we cannot guarantee the security or confidentiality of your personal information as it may be compromised by unauthorised access, hardware or software failure or other relevant factors. If you would like to find out more about our security measures, please

**Contact Us**

## Cookies

Sound and Music uses 'cookies' across its platforms for collecting user information from the website, to allow us to assess the level of use of the website at any time and to generating website statistics to enable us to review, improve and develop our services.

Cookies may collect or store users' Internet Protocol' addresses, which are automatically recognised by the webserver, and session information such as the duration of the visit and the type of browser used. Such information is only used for system administration of that platform or website and to compile statistics and to review use and the effectiveness of that platform or website.

We use the following cookies, on the following platform, for the following purposes:

**www.soundandmusic.org –**

The Sound and Music platform uses the following cookies:

- **User login cookies** – to remember your preferences when you log in, post content or opportunities and to remember you are logged in
- **Google Analytics cookies** - to collect data on the use of the platform to inform future developments to improve your experience

You may **disable cookies** either by editing your users details, or completely blocking cookies in your browser, or by setting up a specific block for cookies in your browser against this platform, but if you do so you will not be able to log in to access your profile, you will not be contributing to Sound and Music's data regarding use of the platform (which is used to improve your experience in the future) and we will not be able to maintain your interface preferences.

You can access this platforms **Privacy Policy here**

**www.britishmusiccollection.org –**

The British Music Collection platform uses the following cookies:

- **Drupal cookies** - to remember your interface preferences
- **User login cookie** - to remember your preferences when you log in, post content or opportunities and to remember you are logged in
- **Google Analytics cookies** - to collect data on the use of the platform to inform future developments to improve your experience

- **Mailing list opt-in offered cookie** – to ensure that you don't get offered the mailing list 'opt-in' if you have already had it

You may **disable cookies** either by editing your users details, or completely blocking cookies in your browser, or by setting up a specific block for cookies in your browser against this platform, but if you do so you will not be able to log in to access your profile, you will not be contributing to Sound and Music's data regarding use of the system (which is used to improve your experience in the future) and we will not be able to maintain your interface preferences.

You can access this platforms **Privacy Policy here**

**www.thesampler.org** –

The Sampler platform uses the following cookies:

- **Wordpress cookies** - to track your session when you log to enabling the site to identify you and serve you content and allow you access to your account
- **User login cookie** - to remember your preferences when you log in, post content or opportunities and to remember you are logged in
- **Google Analytics cookies** - to collect data on the use of the platform to inform future developments to improve your experience
- **Mailing list opt-in offered cookie** – to ensure that you don't get offered the mailing list 'opt-in' if you have already had
- **Sharethis cookies** – to enable users to share the pages they are interested in, via their social media accounts

You may **disable cookies** either by editing your users details, or completely blocking cookies in your browser, or by setting up a specific block for cookies in your browser against this platform, but if you do so you will not be able to log in to access your profile, you will not be contributing to Sound and Music's data regarding use of the system (which is used to improve your experience in the future) and we will not be able to maintain your interface preferences.

You can access this sites **Privacy Policy here**

**www.minuteoflistening.org** –

Minute of Listening uses the following cookies:

- **Wordpress cookies** - to track your session when you log to enabling the site to identify you and serve you content and allow you access to your account
- **User login cookie** - to remember your preferences when you log in, post content or opportunities and to remember you are logged in
- **Google Analytics cookies** - to collect data on the use of the platform to inform future developments to improve your experience
- **Mailchimp cookies - Mailing list opt-in offered cookie** – to ensure that you don't get offered the mailing list 'opt-in' if you have already had
- **Sharethis cookies** – to enable users to share the pages they are interested in, via their social media accounts.
- **Woocommerce cookies** – to enable users to access and interact with the platforms online shop and payment features

You may **disable cookies** either by editing your users details, or completely blocking cookies in your browser, or by setting up a specific block for cookies in your browser against this platform, but if you do so you will not be able to log in to access your profile, you will not be contributing to Sound and Music's data regarding use of the system (which is used to improve your experience in the future) and we will not be able to maintain your interface preferences.

You can access this sites [Privacy Policy here](#)

<https://listenimaginecompose.com> –

The Listen, Imagine, Compose site users the following cookies:

- **User login cookie** - to remember your preferences when you log in, post content or opportunities and to remember you are logged in
- **Google Analytics cookies** - to collect data on the use of the platform to inform future developments to improve your experience
- **YouTube cookies** – to collect data and set the correct modes once you click on the YouTube video player

You may **disable cookies** either by editing your users details, or completely blocking cookies in your browser, or by setting up a specific block for cookies in your browser against this platform, but if you do so you will not be able to log in to access your profile, you will not be contributing to Sound and Music's data regarding use of the system (which is used to improve your experience in the future) and we will not be able to maintain your interface preferences.

You can access this platforms [Privacy Policy here](#)

### Your Rights

You have the right to ask us to confirm whether Sound and Music is processing information about you, and to request access to this information ('right of access').

You may ask us, or we may ask you, to rectify information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate or complete information which is incomplete ('right to rectification'). If you inform us that your personal data is inaccurate, Sound and Music will inform relevant third parties with whom we have shared your data so they may update their own records.

Sound and Music want to ensure that your personal information is accurate and up to date. If any of the information that you have provided us with changes, for example if you change your email address, name, payment details, or if you wish to cancel your registration, please [Contact Us](#)

You have a right to obtain your personal data from us and reuse it for your own purposes, perhaps for another service, without hindering the usability of the data ('right of portability'). This right does not apply where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

You have a right to seek the erasure of your data (often referred to as the 'right to be forgotten'). You may wish to exercise this right for any reason, for example where it is no longer necessary for us to continue holding or processing your personal data you may withdraw your consent. You should note that we are entitled to and reserve the right to retain your data for statistical purposes. This right is not absolute, as we may need to continue processing this information, for example, to comply with our legal obligations, or for reasons of public interest.

You have a right to ask us to restrict our processing of your information ('right to restriction') if:

- you contest its accuracy and we need to verify whether it is accurate
- the processing is unlawful and you ask us to restrict use of it instead of erasing it
- we no longer need the information for the purpose of processing, but you need it to establish or defend legal claims
- you have objected to processing of your information being necessary for the performance of a task carried out in the public interest, or for the purposes of our legitimate interests. The restriction would apply while we carry out a balancing act between your rights and our legitimate interests.
- you exercise your right to restrict processing, we would still need to process your information for the purpose of exercising or defending legal claims, protecting the rights of another person or for public interest reasons.

You have a right to prevent us from processing your data for the purposes of marketing.

If you would like to exercise any of your rights above, please let us know using the contact details at the end of this **Privacy Policy**.

Sound and Music will act in accordance with your instructions as soon as reasonably possible and there will be no charge.

You have a right to report any of your concerns about our use of your data to the Information Commissioner's Office.

You may do so by calling their helpline at **0303 123 1113**

#### **Acknowledgement**

By using any of Sound and Music's platforms and website you acknowledge that you have read the terms of this **Privacy Policy** and that you consent to the collection of information from you and use of such information as described in the related policies.

#### **Changes to our Privacy Policies**

Any changes Sound and Music makes to any of our Privacy Policies in the future will be posted on the relevant platform and where appropriate notified to you by e-mail.

## PART 7. Compliance with Other Data Protection Principles

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### **Purpose Limitation**

Personal data may only be processed for the specific purposes notified to the individual when the data was first collected or for any other purposes specifically permitted by the GDPR. This means that personal data must not be collected for one purpose and then used for another. If it becomes necessary to change the purpose for which the data is processed, the individual must be informed of the new purpose before any processing occurs.

### **Data Minimisation**

Personal data should only be collected to the extent that it is required for the specific purpose notified to the individual. Any data which is not necessary for that purpose should not be collected in the first place.

### **Accuracy**

Personal data must be accurate and kept up to date. Steps should therefore be taken to check the accuracy of any personal data at the point of collection and at regular intervals afterwards, where it is practicable to do so. Inaccurate or out-of-date data should be destroyed.

### **Storage Limitation**

Personal data should not be kept longer than is necessary for the purpose. This means that data should be destroyed or erased from our systems when it is no longer required. For guidance on how long certain data should be kept before being destroyed, please see the table at Part 5 above.

## PART 8. Transfer Limitations

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The GDPR restricts data transfers to countries outside the EEA in order to ensure that the level of data protection afforded to individuals under the GDPR is not undermined. You transfer personal data originating in one country across borders when you transmit, send, view or access that data in or to a different country.

Sound and Music may only transfer Personal Data outside the EEA if one of the following conditions applies:

- the European Commission has issued a decision confirming that the country to which we transfer the personal data ensures an adequate level of protection for the data subjects' rights and freedoms; or
- appropriate safeguards are in place such as standard contractual clauses approved by the European Commission

## PART 9. Third Party Platforms

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In order to deliver its programmes, projects, activity and services Sound and Music uses 'Third Party' platforms; that are recognised and trusted and regularly reviews their delivery and methods.

Sound and Music aims to work with reputable services and those who share an open and transparent ethos.

## PART 10. Key Risks

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Sound and Music has identified the following potential risks which this **Data Protection Policy and Privacy Policy** has been designed to address:

- Breach of confidentiality (information being accessed inappropriately)
- Insufficient clarity about the range of uses to which data will be used — leading to Data Subjects being insufficiently informed
- Failure to offer choice about data use when appropriate
- Breach of security by allowing unauthorised access

- Failure to establish efficient systems of managing changes leading to personal data being outdated
- Harm to individuals if personal data is not up to date

## PART 11. Governance

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Data protection, and the **Data Protection Policy and Privacy Policy** are the responsibility of the [Data Protection Officer](#) and the [Chief Executive of Sound and Music](#).

Sound and Music's [Board of Trustees](#) recognises its overall responsibility for ensuring that the organisation complies with its legal obligations and reviews the Policy annually.

All staff and freelance parties are required to read, understand and accept this **Data Protection Policy** and apply them to any data they handle in the course of their work.

Significant breaches of this Data Protection Policy will be handled under Sound and Music's disciplinary procedures.

## PART 12. Confidentiality and disclosure requests

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Where anyone within Sound and Music feels that it would be appropriate to disclose personal data for reasons not covered by the Data Protection Policy, or where an official disclosure request is received, this will only be done with the authorisation of the Chief Executive (or, in the absence of the Chief Executive, the Chair of Trustees ). All such disclosures will be documented.

## PART 13. Communication of the Policy

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The **Data Protection Policy and Privacy Policy** is published on the Sound and Music website, and is available for all team members at induction and via the Staff Handbook.

## PART 14. Data Subject Rights

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Personal data must be processed in line with individuals' rights. Under the GDPR, individuals have a right to:

- Request access to any data held about them by a data controller. This is known as a subject access request, or a SAR. For details on how SAR's should be handled, please refer to the specific section below.
- Prevent the processing of their data for direct-marketing purposes.
- Ask to have inaccurate data amended.
- Prevent processing that is likely to cause damage or distress to themselves or anyone else.

***Any member of staff who receives a request from a data subject for access to their personal data must refer this immediately to the [Data Protection Officer](#)***

### **Subject Access Requests**

Sound and Music is committed to providing information about individuals' personal data and usage on request. The organisation will aim to provide any information within a 14 day period unless otherwise agreed.

Any personal data requests will be handled in the first instance by the [Data Protection Officer](#) Sound and Music will not charge for Data Protection requests.

All requests must adhere to the following:

- Personal data subject access requests must be in writing
- All staff and freelance parties are required to pass on anything which might be a subject access request to the Data Protection Officer without delay and within two working days of receiving the request at the most
- Where the individual making a subject access request is not personally known their identity will be verified before handing over any information
- The required information will be provided via email or post unless the applicant makes a specific request to be given supervised access in person
- Sound and Music will respond to all Personal data requests within 14 days

## PART 15. Consent

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Personal data and sensitive personal data will only be made public with the full and informed consent of the individuals, and identification may be requested by Sound and Music. (This includes photographs.)

Whenever data is used for any marketing purpose, this purpose will be made clear, and individuals will be given a clear opt out.

## PART 16. Dealing with External Complaints

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- If a member of Sound and Music's team receives an external complaint relating to Sound and Music's use of personal data they are required to:
- If the complaint is that the personal data is inaccurate, inform the complainant that it shall be rectified as soon as possible, update the record and notify your line manager;
  - for a complaint of a more serious nature, including any allegation of misuse of personal data, inform your line manager who should refer to the Data Protection Officer immediately
- Requests for information: any member of staff who receives a written request (including by e-mail) for access to personal data should forward it to the Data Protection Officer immediately and inform their line manager that they have done so
- If an individual makes a verbal request for access to their personal data, they should be asked to put their request in writing and told that Sound and Music will require proof of their identity before dealing with such requests

## PART 17. Contacting Sound and Music

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Please address requests and questions about the **Data Protection or Privacy Policy** to:

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|--|--|
| <p>The Data Protection Officer<br/>Sound and Music<br/>Somerset House<br/>Strand<br/>London<br/>WC2R 1LA<br/>Email: <a href="mailto:info@soundandmusic.org">info@soundandmusic.org</a></p> | <p>The Organisation for New Music and Sound<br/>(trading as Sound and Music)</p> <p>A company limited by guarantee registered in England under number 6581022</p> <p>Registered office: 3rd Floor South Wing Somerset House, Strand, London WC2R 1LA</p> |
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