



# Lambeth Music Service/In Harmony Lambeth Privacy Policy

## 1. Introduction – explanation of privacy and the policy

1.1. We, Lambeth Music Service/In Harmony Lambeth, London Borough of Lambeth, are committed to protecting and respecting your privacy.

1.2. This Privacy Policy sets out the basis on which any personal data we collect from users of our services, our staff, employment applicants and partner organisations, or that you provide to us, will be processed by us, in accordance with the Data Protection Act 1998 (the Act).

## 2. What information we collect

2.1. We may collect and process the following types of information provided by you:

- 2.1.1. Name;
- 2.1.2. Address;
- 2.1.3. Email addresses;
- 2.1.4. Telephone numbers
- 2.1.6. Employment history;
- 2.1.7. School admission details; and
- 2.1.8. Any other data as notified to you from time to time;
- 2.1.9. Gender;
- 2.1.10 Pupil premium data;
- 2.1.11 Instrument hire;
- 2.1.12 Emergency contact details;
- 2.1.13 Record of consent given for photo permission, marketing, publicity;
- 2.1.14 Data included in bursary applications;

This will be recorded together with Personal Data.

## 3. Sensitive Personal Data

3.1. Sensitive Personal Data we may collect may include:

- 3.1.1. Physical or medical information;
- 3.1.2. Religious beliefs or similar beliefs of a similar nature;
- 3.1.3. Racial or ethnic origin information;
- 3.1.4. Your sexual orientation; and
- 3.1.7. The commission or alleged commission by you of an offence.

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3.2. If we collect Sensitive Personal Data we will either obtain your prior explicit consent to do so or ensure that we are permitted to process your Sensitive Personal Data, without obtaining your express consent, provided that we are legally permitted to do so under the Act.

## 4. How we collect data

### Information provided by you

4.1. Information that you provide by:

- 4.1.1. Registering to use our site;
- 4.1.2. Subscribing to our services;
- 4.1.3. Requesting further goods &/or services;
- 4.1.4. Posting material;
- 4.1.5. Filling in forms on our site. This includes information provided at the time of registering to use our site, Speedadmin forms, subscribing to our service, posting materials or requesting further services;
- 4.1.6. Correspondence between us, including e-mails;
- 4.1.7. responding to surveys that we may from time to time ask you to complete for us, although you are not always obliged to complete these;
- 4.1.8. Entering a competition or promotion sponsored by us;
- 4.1.9. Reporting problems regarding our service or site;
- 4.1.10. During transactions you carry out through our site and the fulfilment of your orders.

### Automatic Information and Cookies:

4.2. We may capture and store some information about your computer, such as your IP address, operating system and browser type, for system administration. This information is purely statistical and does not identify you as an individual. We use this data to help us understand our users' browsing patterns and to shape our marketing.

4.3. For the same reason, we may obtain information about your general usage of the site by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver better and more personalised service. They enable us:

- 4.3.1. To estimate our audience size and usage pattern;
- 4.3.2. To store information about your preferences, and so allow us to customise our site according to your individual interests;
- 4.3.3 to recognise you when you return to our site.

4.4. You may refuse to accept cookies by activating the setting on your browser. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting to refuse cookies, our system will issue cookies when you first visit our site.

### Other communications:

4.6. We may keep records of any contact you have with us.

## 5. How we use your information

5.1. We use the information held about you in the following ways:

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- 5.1.1. To ensure that content from our site is presented in the most effective manner for you and for your computer;
  - 5.1.2. To plan and manage our activities, possibly through researching and analysing your use of the site;
  - 5.1.3. To provide you with information about new ideas and facilities;
  - 5.1.4. To process your order for our goods and/or services and fulfil any contractual obligations with you that arise from any order you place.
  - 5.1.5. To provide you with further or new information about, or access to, our goods and/or services;
  - 5.1.7. To notify you about changes to our service; and
  - 5.1.8. To collect online vacancy information which will be used in the selection process for the job for which you have applied. The information supplied on the online application form will be viewed by relevant members of the short listing/interview panel. The information supplied on the Equal Opportunities form will not be made available to the short listing/interview panel and will only be used for statistical purposes and to enable us to measure how we are progressing in terms of the Equal Opportunities Policy.
- 5.3. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sales to you.
- 5.4. We will ask for your consent if we wish to use your personal information for any other purpose.
- 5.5. We will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected.
- 5.6. For Online Vacancy information: Data for successful applicants may be retained for the payroll system. Data for unsuccessful applicants may be converted to an anonymous format after 6 months and used only for analysis.

## 6. Where we store your personal data

- 6.1. As of the 01/01/2019, the data that we collect from you will not be transferred to, or stored at, a destination outside the European Economic Area ("EEA").
- 6.2. All information you provide to us is stored on approved third party secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## 7. Security and Data Retention

- 8.1. The transfer of information via the internet is not completely secure. We will do our best to protect your personal data, but we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try and prevent unauthorised access and protect your personal data against unlawful processing, accidental loss, destruction and damage. We will retain your information for a reasonable period of time or as long as the law requires.

## 10. Your rights

- 10.1. You have the right to ask us not to process your personal data for marketing purposes. We will obtain prior consent if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such

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purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right to prevent such processing at any time by contacting [info@lambethmusic.co.uk](mailto:info@lambethmusic.co.uk)

## 11. Accuracy of information

11.1. You are responsible for informing us when your personal details have changed by updating your Speedadmin profile.

## 12. Access to information

12.1. The Act gives you the right to access information held about you in accordance with the Act.

## 13. Acceptance of the Privacy Policy

13.1. By accepting this Privacy Policy and our Website Terms of Use, you are expressly consenting to our use and disclosure of your personal information in the manner described in this Privacy Policy. If for some reason you object to this use and any disclosure of your personal information then please do not register with us.

## 14. Contact us

14.1. For the purposes of the Act, the data controller details are as follows:

### Controller DPO

**Email** [infogov@lambeth.gov.uk](mailto:infogov@lambeth.gov.uk)

**Address:** London Borough of Lambeth, Head of Information Governance, PO Box 734, Winchester, S023 5DG

**Telephone:** 020 7926 7717

14.2. If you have any questions about your personal data or our Privacy Policy, or if you wish to correct any data about yourself that you feel to be inaccurate, please write to 'The Data Protection Officer' at our above address.

## 15 Your information

Your personal information belongs to you and you have the right to:

- be informed of how we will process it
- request a copy of what we hold about you and in commonly used electronic format if you wish (if you provided this to us electronically for automated processing, we will return it in the same way)
- have it amended if it's incorrect or incomplete
- have it deleted (where we do not have a legal requirement to retain it)
- withdraw your consent if you no longer wish us to process
- restrict how we process it
- object to us using it for marketing or research purposes
- object to us using it in relation to a legal task or in the exercise of an official authority
- request that a person reviews an automated decision where it has had an adverse effect on you

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If you would like to access any of the information we hold about you or have concerns regarding the way we have processed your information, please contact:

Adrian Newman, Head of Service

[anewman@lambeth.gov.uk](mailto:anewman@lambeth.gov.uk)

## 16. Complaints about our use of your data

We would prefer any complaints to be made to us initially so that we have the opportunity to see if we can put things right. However, if you are unhappy with the way we have processed your information or how we have responded to your request to exercise any of your rights in relation to your data, you can raise your concerns direct with the Information Commissioner's office Tel No. 0303 123 1113 <https://ico.org.uk/concerns/>

## 17. Changes to our Privacy Policy

17.1. Our Privacy Policy may change from time to time. This site will always contain our current Privacy Policy. Where appropriate, we will notify you of any important changes by email.

17.2. This Privacy Policy was last updated in November 2020.

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