

At Rocksteady Music School ("we", "us", "our") we are committed to protecting and respecting your privacy, whilst striving to provide you with the very best user experience. We work very hard to keep your information safe and we want our website and our services to be safe and enjoyable for everyone. We also recognise that it is important for you to understand how we use your personal information.

This privacy notice (and any other documents referred to in it) describes the way we will process and use any personal information about our customers, potential customers, participants in our classes, visitors to our websites, contacts at relevant schools, suppliers, other professional contacts and job applicants. We aim to be transparent about our data practices regarding the personal data that we may collect, use, maintain and otherwise process. Please read this privacy notice carefully to understand our practices regarding your personal data and how we will treat it.

Throughout this notice we refer to data protection legislation which includes (but is not limited to), the UK General Data Protection Regulation (the "GDPR") and the Privacy Electronic Communication Regulations ("PECR").

We (Rocksteady Music School) are both a data controller and a data processor in relation to the personal data we process. We are registered with the Information Commissioners Office (the ICO) with registration number ZA367955.

You can contact us using the details set out at section 11 of this privacy notice below.

## I The structure of this privacy notice

Because the types of personal information that we collect about you, how we collect it and what we use it for is quite different depending on our relationship with you, we have split some sections of this privacy notice into different parts to help make the position a bit more relevant for you.

All you need to do is identify whether you are a:

- parent of a child either using or considering using our services ("**Parent**");
- a contact at a school that we provide services to (or that we may do so in the future), one of our suppliers (or potential suppliers) or a job applicant ("**Third Party Contact**").

You only need to read the sections that are relevant to you.

If you are a Parent, to make things less confusing, where we refer to 'your personal data' we are referring to the personal data of both you and your child.

## 2 Information collected about you

Please read the section below that is relevant to you.

### Parent

The personal data that we collect from or about you includes the following:

- Your full name
- Your email address
- Your telephone number
- Your postal address
- Your child's full name
- Your child's school
- Your child's age
- Any relevant medical information regarding your child
- Your preferences (such as the instrument you want your child to play or a particular band you want them to join)
- Your child's attendance history and any reasons for absence that you give us
- Recordings and images of your child taking part in our services where we are permitted to do so via your consent
- Your password and account details (if you create an account with us)
- Your purchase history with us and your payment details (such as billing address and card details) where you provide them to our customer services team
- Your social media handle/user name details if you engage with us on social media
- Technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, device types, operating system
- Information about your visit to our website, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed, searched for or purchased, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse the website. We also use Google Analytics to analyse how visitors use our website via cookies.
- Any feedback that you give us or our customer services team
- Any other information that you choose to give to us via our website or to our customer services team

### Third Party Contact

The personal data that we collect from or about you may include the following:

- Your full name
- Your email address

- Your postal address
- The organisation you work for
- Your CV and/or application form
- References / DBS check results / Your Right to Work
- Technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, device types, operating system
- Information about your visit to our website, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed, searched for or purchased, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse the website. We also use Google Analytics to analyse how visitors use our website via cookies.
- Any other information that you choose to give to us

### **3 How do we collect information about you?**

Please read the section below that is relevant to you.

#### **Parent**

We may collect personal data in a variety of ways, but essentially it is when you give it to us, which includes when you:

- Create an account with us
- Access our website
- Ask us to provide you with services and use our services
- Sign up to receive marketing communications from us
- Contact our customer services team
- Enter one of our competitions, promotions, or fill in a survey
- Engage with us on social media (for example by mentioning/tagging us or by contacting us directly)
- Leave comments on our website or interact with other functionality where you provide us with data on our website

We may occasionally also receive information about your child from their school.

#### **Third Party Contact**

We may collect personal data in a variety of ways, including when you:

- Enter into contractual negotiations with us
- Sign up to receive marketing communications from us
- Contact our customer services team

- Attend one of our events
- Send us your CV or application form or where we receive this from an employment agency acting on your behalf
- Where it is given to us by one of our business partners

## 4 How do we use your personal data and what are our justifications for doing so?

Please read the section below that is relevant to you.

### Parent

How and why we use your personal data	What is our legal justification for processing your personal data
To provide you with the information and services that you request or purchase from us (i.e. to complete certain tasks, processes, and to communicate with you regarding the services that you purchase or request from us and respond to your questions and comments).	We rely on our contractual arrangements with you as the lawful basis on which we collect and process your personal data in relation to an order for products and services.  Alternatively, in some scenarios, we rely on our legitimate interests as a business (for example, it is in our interests to measure customer satisfaction and troubleshoot customer issues or deal with your specific queries on social media). Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.
To measure how satisfied our customers are and provide customer service (including troubleshooting in connection with purchases or your requests for services or when you ask us questions on social media);	We can usually only use your personal data to send you marketing messages if we have consent from you to do so.  You can ask us to stop sending you marketing messages by contacting us at any time at the contact details set out at section 11 of this privacy notice below.
We may use your personal data to tell you about relevant products/services and offers ("marketing").	We rely on our legitimate interests as a business (for example, it is in our interests to ensure that your child is provided with a safe environment to learn and to receive the best quality session and teaching that we can provide). Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.
To capture video footage and images of sessions involving your child session for safeguarding, quality control and training purposes.	We rely on your consent. You can withdraw this consent at any time by contacting us at any time at the contact details set out at section 11 of this privacy notice below.
To capture video footage and images of sessions involving your child for the purposes of creating media for the parent timeline, accessible via a secure portal and location within the Rocksteady network ("Backstage"), made only available to the school and other Rocksteady Parents in your child's band.	

<p>To record sessions involving your child for our marketing purposes.</p>	<p>We rely on your consent. You can withdraw this consent at any time by contacting us at any time at the contact details set out at section 11 of this privacy notice below.</p>
<p>To find out more about the users of our services as a whole (not to find out more about you as an individual) to ensure that the promotions, products and services that we offer are most likely to interest our customers</p>	<p>We have a legitimate interest to make sure that we are providing you with the information that we think is most relevant to you.</p> <p>Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.</p>
<p>To monitor the use of our website and ensure that it is presented in the most effective and relevant manner for you and your device.</p> <p>We may use cookies to do this.</p>	<p>We have a legitimate interest to ensure that our website works properly and that our products and services are high quality and efficient.</p> <p>We rely on consent to place cookies on your device. For information on how we use cookies, please see our <a href="#">cookie statement</a>.</p>
<p>We may record calls you make to us and will use this data for training and quality assurance purposes (where your call is recorded, we will tell you in advance).</p>	<p>We use data in this way for a variety of reasons. It may be pursuant to a legal obligation, and it is also in our legitimate interests to review call recordings for quality control purposes.</p>
<p>To ensure that the personal and financial information that you provide to us is accurate</p>	<p>In some cases, we will use your personal data because it's necessary for us to comply with a legal obligation (such as if we receive a legitimate request from a law enforcement agency). In other cases (such as the detection of fraud or ensuring security of the site) we will rely on our legitimate interests as a business to use your personal data in this way. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.</p>
<p>To detect, investigate, report, and seek to prevent financial crime or other illegal activity</p>	
<p>To manage risk for us and our customers.</p>	
<p>To fulfil our legal and compliance-related obligations</p>	
<p>For administrative or business purposes, where you contact us for a particular reason other than those set out above, such as to report problems with our website.</p>	<p>We have a legitimate interest to respond to your contact for the purposes of administering our business. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.</p>

### Third Party Contact

How and why we use your personal data	What is our legal justification for processing your personal data
<p>Where you are one of our contacts in a school, to provide you with the information and services that we request or purchase from us (i.e. to complete certain tasks, processes, and to communicate with you regarding the services that your school purchases or requests from us and respond to your questions and comments).</p>	<p>We rely on our contractual arrangements with you as the lawful basis on which we collect and process your personal data in relation to an order from your school for products and services.</p> <p>In other cases (such as maintaining an internal list of schools that have previously contacted us) we will rely on our legitimate interests as a business to use your personal data in this way. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.</p>
<p>Where you provide services to us, to engage with you as a service provider, including making queries regarding the services that you provide and for the purposes of managing our contract with you.</p>	<p>We rely on our contractual arrangements with you as the lawful basis on which we collect and process your personal data in relation to your provision to us of products and services.</p> <p>In other cases (such as to maintain an internal list of potential suppliers) we will rely on our legitimate interests as a business to use your personal data in this way. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.</p>
<p>Where you have contacted us with your CV and/or in response to an advertised job with us.</p>	<p>We rely on our contractual arrangements with you as the lawful basis on which we collect and process your personal data where we offer you a position.</p> <p>When we are running our recruitment process, or where we retain your information on file to be considered for future positions, we rely on our legitimate interests as a business. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.</p>

## 5 Children’s Data and Safeguarding

We understand the importance of ensuring children’s data is kept safe and do all we can to make sure it is not compromised, and in line with a parent’s reasonable expectations. We have security measures and procedures in place should we become aware of any compromise to a child’s data and will inform relevant parties as needed and required under data protection legislation.

Rocksteady Music School has a statutory and moral duty to safeguard and promote the welfare of all children receiving education and training with us. More information can be found in our [Safeguarding notice](#).

## 6 Recorded Music Sessions

We record our music sessions which can involve photographic images, audio and visual recordings. We do this for the following purposes:

1. Safeguarding
2. Quality control and training purposes
3. Help with lesson planning and future development
4. Showcasing a child's educational experience with us

We don't record/photograph every musical session or performance piece involving children, but where we do record/photograph sessions for our 'Backstage' feature, we gather consent to do so from parents/guardians/carers. Consent can also be withdrawn at any time should a parent/guardian/carer chose to do so.

Where schools have enrolled children via our bursary and funded schemes, we will not record/take photos unless direct consent has been provided to us from a parent/guardian/carer. Any consent withdrawals, concerns or complaints we will pass them onto the school as necessary.

## **7 Data Sharing**

When we provide you with services, we may share your personal data with our trusted third-party service providers as detailed below. Whenever we share your personal data, we put safeguards in place which require these other organisations to keep your data safe and to ensure that they do not use your personal data for their own marketing purposes unless you have given us your consent to do so. We will never sell your personal data to a third party.

**a. To fulfil orders for products and services:**

We work with a number of trusted service providers who carry out services on our behalf. When you purchase services from us, the services provided by these service providers include website and database hosting, helping us provide our live lessons online and processing your payment securely. It is in our legitimate interests as a business to work with these service providers since we may not have the capabilities to provide these services ourselves. In each case, we will ensure that the service provider is only allowed to use your personal data in order to provide the services to us and for no other purpose.

If you are a Parent, we may also share your child's timetable with their school where required.

**b. Other professional services:**

We may need to disclose your personal data to our insurers where we believe that it is required under our contractual relationship with our insurance provider to do so.

We work with carefully selected third parties, such as our customer database hosting provider, marketing agencies and advertising partners who assist us in providing you with a positive customer experience.

c. [Sharing data to prevent crime and otherwise comply with laws:](#)

There may be scenarios where we are subject to a legal obligation to disclose or share your personal data, such as with law enforcement agencies, regulatory bodies or public authorities in order to prevent or detect crime. We will only ever disclose your personal data to these third parties to the extent we are required to do so by law.

d. [Where our group structure changes:](#)

We may also share your personal data if we choose to sell, transfer, or merge parts of our business and/or group, or our assets in the future. Or we may seek to acquire other businesses or merge with them. During any such process, we may share your data with other parties. We will only do this if they agree to keep your data safe and private. If a change to our group happens, then other parties may use your data in the same way as set out in this notice.

## **8 Where we transfer and store personal data**

There may be instances where we may need to transfer personal data outside the UK/EEA. We may need to share personal data with companies who are in the European Economic Area (The EU member states, Norway, Iceland, and Liechtenstein), in an adequate listed country or in other third countries who may not have similar data protection laws to the UK. If we need to transfer personal data outside the UK, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this privacy notice.

## **9 Security of your information**

We take the security of your information very seriously and have put physical, technical, operational and administrative strategies, controls and measures in place to help protect your personal information from unauthorised access, use or disclosure as required by law and in accordance with accepted good industry practice. We will always keep these under review to make sure that the measures we have implemented remain appropriate.

## **10 Retention of your information**

We will keep your personal information for limited and appropriate periods of time only, the applicable retention periods will always be linked to our purposes for processing your personal information. This means that the retention periods will vary according to the type of personal information.



Recordings of lessons for safeguarding and training purposes will be held for a reasonable period, if we identify an issue or training opportunity parts of the recordings may be retained for longer periods depending on how long we need to keep them.

If you would like more information on our data retention practices, please contact us at the contact details at section 11 of this privacy notice below.

## **11 Your rights in your information**

You have certain rights in respect of the personal information that we hold about you (or your child). Details of these rights are set out below. To exercise any of these rights, please contact us at the contact details at section 11 of this privacy notice below.

You have the right:

- to ask us not to use your personal data for direct marketing purposes;
- to ask to see what personal data we hold about you and to find out about the way that we process the data (and in some circumstances, you can ask us to provide a copy to a third party);
- to ask us to correct or update any personal data which is inaccurate;
- to ask for personal data to be deleted in some (but not all) circumstances where there is no good reason for us to continue to use it;
- to ask us to temporarily stop using your data if you don't believe that we have a right to use it, or to stop us from using your personal data where there is no good reason for us to continue to use it; and
- not to be subject to decisions made solely on the basis of 'automated processing' (i.e. the right not to be subject to decisions made solely by algorithms or computers without input from a human) in certain circumstances.

If you would like to exercise any of the above Rights, you can do so by sending us a written request to our email address mentioned in section 11.

## **12 Changes to this notice**

We reserve the right to modify this privacy notice from time to time – for example, if we need to reflect changes to the way that we use your personal information. Any changes we make in the future will be posted on our websites and, where appropriate, notified to you by e-mail. You should check back frequently to see any updates or changes to our privacy notice.

This notice was last updated on 30<sup>th</sup> May 2023

## **I3 Contact Us**

We are very keen to hear from you, including if you have any questions, concerns, comments, requests or complaints regarding this privacy notice, our websites and/or our use of your personal information. Please contact us at the following details:

### **Rocksteady Music School**

Bohunt Manor, Portsmouth Road, Liphook, Hampshire, GU30 7DL

TELEPHONE: 0330 113 0330

EMAIL: [info@rocksteadymusicschool.com](mailto:info@rocksteadymusicschool.com)

We have also appointed an external data protection officer (DPO) and their details are as follows:

### **Evalian Limited**

West Lodge, Leylands Business Park, Colden Common, Hampshire, SO21 1TH

TELEPHONE: +44 (0)333 050 0111

EMAIL: [data@rocksteadymusicschool.com](mailto:data@rocksteadymusicschool.com)

## **I4 How to raise a concern about how your data is handled**

Please contact us with any concerns you have about how we are handling your data. For detailed guidance on how to raise a concern, and your rights to escalate concerns to the Information Commissioners Office (ICO) please visit: <https://ico.org.uk/your-data-matters/>