

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 policy (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 and 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 policy carefully to understand our practices regarding your personal data and how we will treat it.

We have a legal duty to protect personal information that we collect under the Data Protection Act 2018 (the "DPA") and the General Data Protection Regulation (EU) 2016/679, (the "GDPR"). For the purpose of the DPA and GDPR, we (Rocksteady Music School) are the data controller (in other words, the organisation that determines how your personal information is used).

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

1 The structure of this privacy policy

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 policy 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 name
- Your email address
- Your telephone number
- Your postal address
- Your child's 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 of your child taking part in our services where we are permitted to do so or where you have given 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
- 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 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
- Any other information that you choose to give to us

Recordings of our sessions

When your child attends one of our live sessions online, we shall record these sessions for safeguarding purposes to provide your child with a secure environment to work in. We may record offline sessions for the same provision. We also use these recordings for quality control and training purposes to ensure that your child gets the best learning experience that we can offer. You have the right to object to this processing at any time in accordance with section 9 of this privacy policy below.

When your child attends one of our sessions at a school or one of our live online sessions, with your consent, we may film, photograph and record your child's musical performance as an optional part of the educational experience we deliver to be used as part of a pre-recorded concert for consumption by the school and other Rocksteady Parents in your child's band and/or (with a separate consent) as part of our marketing purposes. Your child can take part in Rocksteady services without you consenting to these parts of our product on their behalf. You can withdraw your consent for these recordings or the uses of the recordings at any time by contacting us using the contact details set out at section 11 of this privacy policy below.

Where Rocksteady acts as data processor on behalf of a school or organisation acting as the data controller, where Rocksteady does not have a direct relationship with a parent or legal guardian of a child, instruction upon recording permissions shall be sought from the data controller and acted upon accordingly in line with the provisions outlined in this policy.

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 or 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.
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);	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.

<p>We may use your personal data to tell you about relevant products/services and offers ("marketing").</p>	<p>We can usually only use your personal data to send you marketing messages if we have consent from you to do so or, in some cases, we can rely on a legitimate interest.</p> <p>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 policy below.</p>
<p>To record sessions involving your child within an online and/or offline session for safeguarding, quality control and training purposes.</p>	<p>For these sessions, 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.</p>
<p>To record sessions involving your child within an online session for the purposes of creating video concerts for consumption within a secure access platform accessible via a secure portal and location within the Rocksteady network ("Backstage") made available to the school and other Rocksteady Parents in your child's band.</p>	<p>For this online session, 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 policy below.</p>
<p>To record sessions involving your child within an offline session for the purposes of creating video concerts for consumption within a secure access platform accessible via a secure portal and location within the Rocksteady network ("Backstage") made available to the school and other Rocksteady Parents in your child's band.</p>	<p>For this offline session, 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 policy below.</p>
<p>To record sessions involving your child within an online session for our marketing purposes.</p>	<p>For this online session, 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 policy below.</p>
<p>To find out more about the users of our services as a whole (and 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</p>

	device. For information on how we use cookies, please see our cookie statement https://www.rocksteadymusicschool.com/cookie-policy/
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).	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.
To ensure that the personal and financial information that you provide to us is accurate	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.
To detect, investigate, report, and seek to prevent financial crime or other illegal activity	
To manage risk for us and our customers.	
To fulfil our legal and compliance-related obligations	
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.	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.

Third Party Contact

How and why we use your personal data	What is our legal justification for processing your personal data
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>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 to maintain 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>
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>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>
Where you have contacted us with your CV and/or in response to an advertised job with us.	<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</p>

	<p>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 Disclosing information

When we provide you with services, in order for us to provide our services to you, we 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.

6 Where we transfer and store personal data

We shall not transfer your personal data outside of the UK and the European Economic Area (EEA).

7 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.

8 Retention of your information

We will keep your personal information for limited and appropriate periods of time only and 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 only be retained for 14 days unless we identify an issue or training opportunity in which case 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 policy below.

9 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 policy 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.

10 Changes to this policy

We reserve the right to modify this privacy policy 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 policy.

This policy was last updated on 1st December 2020.

11 Contact Us

We are very keen to hear from you, including if you have any questions, concerns, comments, requests or complaints regarding this privacy policy, 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

12 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/>