



CORNWALL MUSIC SERVICE TRUST

Patron: Charles Hazlewood

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# Privacy Notice - External

## Who We Are

**Cornwall Music Service Trust** gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and Laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

**Cornwall Music Service Trust:** Registered with the Charity Commission for England and Wales (number 1159622) and a company limited by guarantee (number 09268124) registered in England. Registered office: Cornwall Music Service Trust, Truro School, Trennick Lane, Truro TR1 1TH  
Cornwall Music Service Trust is registered with the Information Commissioners Office ZA096861.

## Information That We Collect

**Cornwall Music Service Trust** processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

### ***The personal data that we collect from you is: -***

- Name
- Address
- Email
- Telephone Numbers
- Tax Payer Status
- Evidence of Entitlement to Remission and/or Subsidies
- Learners Name
- Learners Gender
- Learners Date of Birth
- School attended
- Learners Address
- Medical and Dietary Information

### ***We collect information in the below ways: -***

- Telephone
- In Writing



CORNWALL MUSIC SERVICE TRUST  
Patron: Charles Hazlewood

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- Email/SMS
- Electronic (i.e. via website form)

### **How We Use Your Personal Data (Legal Basis for Processing)**

**Cornwall Music Service Trust** takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

### ***The purposes and reasons for processing your personal data are detailed below: -***

- We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests

### **Online and Distance Learning**

#### **Data and access to data using Google Hangouts**

Google Hangouts is a secure online platform managed by CMST. As with Google Schools and other online learning platforms used by schools, nobody external to CMST will have access to video streams or any data related to online lessons.

Students are instructed not to take screenshots or make video recordings of online sessions. Any training materials used for lessons can be shared by the teacher via the Google Hangout. Students are not able to send files in the Hangout.

Google Hangouts doesn't keep a history of text from "chats" during video hangouts, so no data is kept by CMST. However, video recordings of teaching sessions will show chat content should any issues arise that need to be addressed.

### **GDPR - Children's personal information**

CMST will not collect any information about students' personal IDs or logons. Unlike other systems (such as Skype, Facetime, or Messenger) Google Hangouts works by sending an invitation link to the parent or carer's email address.



CORNWALL MUSIC SERVICE TRUST

**Patron: Charles Hazlewood**

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Students are asked not to share any personal contact information with teachers or other students (such as social media names or phone numbers). If there are any issues with students doing this, the teacher will remove the student from the online session and contact the parent/carer to discuss how to stay safe online.

### **Your Rights**

You have the right to access any personal information that **Cornwall Music Service Trust** processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

### **Sharing and Disclosing Your Personal Information**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. **Cornwall Music Service Trust** uses a thirdparty to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

### **Cornwall Music Education HUB (CMEH) and Cornwall Council (CC)**



CORNWALL MUSIC SERVICE TRUST

**Patron: Charles Hazlewood**

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As part of our processes of claiming remissions and subsidies for learners along with assisting Cornwall Music Education HUB with Data Returns to the Arts Council we will need to share information with CMEH and CC through this process. For more information about Cornwall Music Education HUB, please read their Privacy Notice at

<http://www.cornwallmusiceducationhub.org/media/3182/cmeh-privacy-notice-may-2018.pdf>

### **Paritor Ltd**

We use Paritor Ltd as our management software programme who through Microsoft PLC provide our data hosting. For more information about Paritor Ltd, please read their GDPR Compliance Statement and Privacy Policy on the links below:

<https://drive.google.com/file/d/0B94eTrjNbebtCFQzVV9IWI1dFNyUzRiNEJRRVRIWI9sbHBr/view?usp=sharing>

<https://drive.google.com/file/d/0B94eTrjNbebtR0ZpUm1nM21ZQnpHdXVFT112aE53OW5zSHpN/view?usp=sharing>

### **Microsoft PLC.**

Paritor use Microsoft PLC to provide data hosting and management services via use of their Office 365 product. They act in the capacity of a processor on their behalf.

Please note below the Privacy Notices of all third party organisations we use operationally:

For more information about Microsoft PLC, please read their Privacy Notice at

<https://www.microsoft.com/en-us/trustcenter>

For more information about Xero Ltd, please read their Privacy Notice at

<https://www.xero.com/uk/about/terms/privacy/>

For more information about MailChimp, please read their Privacy Notice at

<https://mailchimp.com/legal/privacy/>

For more information about Survey Monkey, please read their Privacy Notice at

<https://www.surveymonkey.com/mp/legal/privacy-policy/>

For more information about Google, please read their Privacy Notice at

[https://privacy.google.com/businesses/compliance/#?modal\\_active=none](https://privacy.google.com/businesses/compliance/#?modal_active=none)



CORNWALL MUSIC SERVICE TRUST  
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### **Safeguarding Measures**

**Cornwall Music Service Trust** takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place.

### **Transfers Outside the EU**

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. **Cornwall Music Service Trust**, by virtue of the fact that we engage with the Google Drive platform, will transfer or store personal data outside the EU. However, the level of compliance that Google adheres to is in line with current GDPR legislation.

### **Consequences of Not Providing Your Data**

You are not obligated to provide your personal information to **Cornwall Music Service Trust**. however, as this information is required for us to provide you with our services, we will not be able to offer all our services without it.

### **Legitimate Interests**

As noted in the 'How We Use Your Personal Data' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

An example of when we would use the legitimate interests' legal basis for processing your personal information, would be in the event of direct marketing within the legislation's scope. This would include contacting you with regards to commercial interests that would be directly beneficial to your business.

### **How Long We Keep Your Data**

**Cornwall Music Service Trust** only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

### **Special Categories Data**

Cornwall Music Service Trust will not process sensitive personal information (*known as special category data*) about you.



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### **Marketing**

Occasionally, **Cornwall Music Service Trust** would like to contact you with information regarding products and services that we provide. If you consent to us using your contact details for this purpose, you have the right to modify or withdraw your consent at any time by using the opt-out/unsubscribe options or by contacting **Cornwall Music Service Trust** directly.

If you would like to receive this information please confirm using the provided consent options.

### **LEGITIMATE INTERESTS**

**Cornwall Music Service Trust** will occasionally send you information which will have been identified as being beneficial to our customers and in our interests. Such information will be relevant to you as a customer and is non-intrusive and you will always have the option to opt-out/unsubscribe at any time.

### **Lodging A Complaint**

**Cornwall Music Service Trust** only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.