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Date of next review: 14/05/2021
Review Period: 1 year
Owner: Director

Privacy Policy

The Friends of the Edward Said Conservatory of Music (known as PalMusic UK) is committed to protecting and respecting your privacy. For the purposes of the General Data Protection Regulations (GDPR) and any subsequent UK legislation covering data protection the Data Controller is PalMusic UK.

This Policy sets out why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.

This Policy covers PalMusic in relation to the collection and use of the information you give us. We may change this Policy from time to time. If we make any significant changes we will advertise this on the website or contact you directly with the information. Please check this page occasionally to make sure you are happy with any changes.

If you have any questions about this Policy or concerning your personal information please contact the Director at contact@palmusic.org.uk or by post to PalMusic UK, 1 Gough Square, London EC4A 3DE.

What type of personal information we collect

The type and amount of information we collect depends on why you are providing it.

The information we collect when you make an enquiry includes your name, date of birth, email address, postal address, phone number and preferred themes and methods of communication.

If you are a supporter, for example making a donation, volunteering, registering to fundraise, signing up for an event in addition to asking for your name and contact details (your full address, email address and your phone number) we may also ask you for your preferred themes and methods of communication and reasons for supporting our work if you are willing to provide this information.

The information we collect when you make a donation or payment can include your name, email address, postal address, phone number and preferred themes and methods of communication. For credit and debit card transactions we work in line with Payment Card Industry Data Security Standard compliance requirements. For auditing purposes, for cheque transactions we take a photocopy of the cheque. For direct debit transactions we keep a copy of the authorisation that includes bank account details.

If you are a job applicant, the information you are asked to provide is as set out in the application and necessary for the purposes of our considering the application.

How we collect information

We may collect information from you whenever you contact us or have any involvement with us for example when you:

- visit our website (see our Cookies Policy)
- donate to us or fundraise for us
- enquire about our activities or services
- sign up to receive news about our activities
- post content onto our social media sites
- volunteer for us
- attend a meeting with us and provide us with information
- take part in our events
- contact us in any way including online, email, phone, SMS, social media or post

Where we collect information from

We collect information:

(1) From you when you give it to us directly: You may provide your details when you ask us for information or make a donation, volunteer, attend our events, contact us for any other reason.

(2) When you give it to us indirectly: Your information may be shared with us by other organisations such as fundraising sites like Just Giving or Virgin Money if you are fundraising for us. They should only do so in the way they have set out in their own Privacy Policy which you should check when you give your details.

(3) When you have given other organisations permission to share it: Your information may be provided to us by other organisations if you have given them your permission. This might for example be a charity working with us or might be when you buy a product or service from a third party organisation. The information we receive from other organisations depends on your settings or the option responses you have given them.

(4) When you use our website: When you use our website, information about you is automatically recorded and stored.

(5) When it is available on social media: Depending on your settings or the privacy policies applying for social media and messaging services you use, like Facebook,

Instagram or Twitter, you might give us permission to access information from those accounts or services.

How we use your information

We will use your personal information in a number of ways which reflect the legal basis applying to processing of your data. These may include:

- providing you with the information or services you have asked for
- processing donations you make, including processing for Gift Aid purposes
- organising volunteering activity you have told us you want to be involved in and in relation to the fundraising for us you are involved in
- sending you communications with your consent that may be of interest including marketing information about our services and activities, events, campaigns and appeals asking for donations and other fundraising activities and promotions for which we seek support
- when necessary for carrying out your obligations under any contract between us
- seeking your views on the services or activities we carry out so that we can make improvements
- maintaining our organisational records and ensuring we know how you prefer to be contacted
- analysing the operation of our website and analysing your website behaviour to improve the website and its usefulness
- processing job applications

Our legal basis for processing your information

The use of your information for the purposes set out above is lawful because one or more of the following applies:

- Where you have provided information to us for the purposes of requesting information or requesting that we carry out a service for you, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. You may withdraw consent at any time by emailing us at contact@palmusic.org.uk. This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned.
- It is necessary for us to hold and use your information so that we can carry out our obligations under a contract entered into with you or to take steps you ask us to prior to entering into a contract.
- It is necessary to comply with our legal obligations.
- Where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for your legitimate interests that we provide the information or service requested, and given that you have made the request, would presume that there is no prejudice to you in our fulfilling your request.

If you want to contact us about your marketing preferences please contact us at contact@palmusic.org.uk or call on 020 7832 1340.

Profiling and screening

We use some profiling and screening techniques, performed by our own staff, to ensure communications are relevant and timely, and to provide an improved experience for our supporters. Profiling also allows us to target our resources effectively, which donors consistently tell us is a key priority for them.

We do this because it allows us to understand the background of the people who support us and helps us to make appropriate requests to supporters who may be able and willing to give more than they already do. Importantly, it enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would.

When building a profile we may analyse geographic, demographic and other information relating to you in order to better understand your interests and preferences in order to contact you with the most relevant communications. In doing this, we may use additional information from third party sources when it is available. Such information is compiled using publicly available data about you, for example addresses, listed Directorships or typical earnings in a given area.

If you have any questions or concerns about this, please contact us at contact@palmusic.org.uk or on 020 7832 1340.

How we keep your information safe

We understand the importance of security of your personal information and take appropriate steps to safeguard it.

PalMusic uses and stores data in line with Payment Card Industry Data Security Standard compliance requirements.

We always ensure only authorised persons have access to your information, which means only our staff, volunteers and contractors, and that everyone who has access is appropriately trained to manage your information.

No data transmission over the internet can however be guaranteed to be 100% secure. So while we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

Who could have access to your information?

- Third parties if we run an event in conjunction with them. We will let you know how your data is used when you register for any event.
- Analytics and search engine providers that help us to improve our website and its use.
- Third parties in connection with restructuring or reorganisation of our operations, for example if we merge with another charity. In such an event we will take steps to ensure your privacy rights will be protected by the third party.

Owing to matters such as financial or technical considerations the information you provide to us may be transferred to countries outside the European Economic Area (EEA), which are not subject to the same data protection regulations as apply in the UK. We meet our obligations under GDPR by ensuring that the information has equivalent protection as if it were being held within the EEA. We do this by ensuring that any third parties processing your data outside the EEA either benefits from an adequacy determination for GDPR purposes and/or, where appropriate, we have entered into a Data Processing Agreement which contains model EU clauses.

We may also disclose your personal information if we are required to do so under any legal obligation and may use external data for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights, but is necessary and in the public interest.

Other than this, we will not share your information with other organisations without your consent.

Keeping your information up to date

We really appreciate it if you let us know if your contact details change. You can do so by contacting us at contact@palmusic.org.uk or on 020 7832 1340.

How long we keep your information for

We will hold your personal information for as long as it is necessary for the relevant activity. By way of example, we hold records of donations you make for at least six years so we can fulfil our statutory obligations for tax purposes.

Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. This will usually be for five years. We may periodically ask you to renew your consent.¹

¹ The Fundraiser Regulator states that the period should be assessed having regard to how long the individual would consider it reasonable to be contacted before they are asked to renew consent. (See Fundraiser Regulator's Personal Information and Fundraising: Consent, Purpose and Transparency 21 February 2017 www.fundraisingregulator.org.uk)

If you ask us to stop contacting you with marketing or fundraising materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

Your rights

You have the right to request details of the processing activities that we carry out with your personal information through making a Subject Access Request. Such requests have to be made in writing. More details about how to make a request, and the procedure to be followed, can be found in our Data Protection Policy. To make a request contact us at contact@palmusic.org.uk or on 020 7832 1340 or at 1 Gough Square, London EC4A 3DE.

You also have the following rights:

- the right to request rectification of information that is inaccurate or out of date;
- the right to erasure of your information (known as the “right to be forgotten”);
- the right to restrict the way in which we are dealing with and using your information; and
- the right to request that your information be provided to you in a format that is secure and suitable for re-use (known as the “right to portability”);
- rights in relation to automated decision making and profiling including profiling for marketing purposes.

If you are not happy with the way in which we have processed or dealt with your information, you can complain to the Information Commissioner’s Office. Further details about how to complain can be found [Here](#).

Changes to this Privacy Policy

This Policy may be changed from time to time. If we make any significant changes, we will advertise this on our website or contact you directly with the information.

Do please check this Policy each time you consider giving your personal information to us.