**General Date Protection Regulations (GDPR) Policy**

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## **Liberty Music CIC customer privacy notice**

This privacy notice tells you what to expect us to do with your personal information.

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## **Contact details**

### **Post:** Liberty Music CIC, Unit 8, Fisher’s Industrial Estate, Wiggenhall Road, WATFORD, Hertfordshire, WD18 0FN, GB

### **Telephone:** 01923 230777

### **Email:** info@libertymusic.co.uk

## **What information we collect, use, and why**

We collect or use the following information for **the operation of customer accounts and guarantees**:

* Names and contact details
* Addresses
* Payment details (including card or bank information for transfers and direct debits)
* Purchase history
* Account information, including registration details
* Marketing preferences

We collect or use the following information for **service updates or marketing purposes**:

* Names and contact details
* Addresses
* Marketing preferences
* Location data
* Records of consent, where appropriate

We also collect or use the following information for **service updates or marketing purposes**:

* Racial or ethnic origin
* Religious or philosophical beliefs
* Genetic information
* Health information
* Sexual orientation information

We collect or use the following information for **research or archiving purposes**:

* Names and contact details
* Addresses
* Location data
* Personal information used for administration of research
* Personal information used for the purpose of research
* Records of consent, where appropriate

We also collect or use the following information for **research or archiving purposes**:

* Racial or ethnic origin
* Religious or philosophical beliefs
* Genetic information
* Health information
* Sexual orientation information

We collect or use the following information to **comply with legal requirements**:

* Name
* Contact information
* Identification documents
* Financial transaction information
* Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)
* Health and safety information

We also collect or use the following information to **comply with legal requirements**:

* Biometric information (where used to identify someone)

We collect or use the following information for **recruitment purposes**:

* Contact details (eg name, address, telephone number or personal email address)
* Date of birth
* National Insurance number
* Copies of passports or other photo ID
* Employment history (eg job application, employment references or secondary employment)
* Education history (eg qualifications)
* Right to work information
* Details of any criminal convictions (e.g. Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

We also collect or use the following information for **recruitment purposes**:

* Biometric information (where used to identify someone)

We collect or use the following personal information for **dealing with queries, complaints or claims**:

* Names and contact details
* Address
* Purchase or service history
* Video recordings of public areas
* Witness statements and contact details
* Relevant information from previous investigations
* Customer or client accounts and records
* Financial transaction information
* Information relating to health and safety
* Correspondence

## **Lawful bases and data protection rights**

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below;

* **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
* **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
* **Your right to erasure** - You have the right to ask us to delete your personal information.
* **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information.
* **Your right to object to processing** - You have the right to object to the processing of your personal data.
* **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
* **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. .

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

### **Our lawful bases for the collection and use of your data**

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
* Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

*Liberty Music is a Community Interest Company (CIC), described by the DofE as an Out Of School Setting (OOSS). We offer music services to adults, vulnerable adults and children at professional music studios. In order to comply with safeguarding policies and procedures we must register users of our services, hold their personal data and contact data for two emergency contacts. Safeguarding is a legal requirement for our business.*

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

*Liberty Music CIC's services and events are community lead. Ideas and feedback from the our service users help us to develop projects and events which best suit the community, our users and our business. We must be able to reach out using personal details.*

Our lawful bases for collecting or using personal information for **research or archiving purposes** are:

* Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

*Liberty Music CIC's services and events are community lead. Ideas and feedback from the our service users help us to develop projects and events which best suit the community, our users and our business. We must be able to reach out using personal details.*

Our lawful bases for collecting or using personal information for **legal requirements** are:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

* Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
* Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

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## Where we get personal information from

* Directly from you
* Health care providers
* Legal and judicial sector organisations
* Schools, colleges, universities or other education organisations
* Councils and other public sector organisations
* Suppliers and service providers

## **How long we keep information**

Liberty Music CIC is required by law to have a retention schedule which describes how long the organisation will your keep personal information;

**The operation of customer accounts and guarantees;** Liberty Music CIC will keep your personal information for up to 2 years after the date your customer account expired and up to one year after your guarantee expired.

**Service updates or marketing purposes;** Liberty Music CIC will keep your personal information for up to 2 years after the date you last used the organisations services and/or facilities.

**Research or archiving purposes;** Liberty Music CIC will keep your personal information for up to 2 years after the date you last used the organisations services and/or facilities.

**Recruitment purposes;** Liberty Music CIC will keep your personal information for up to 2 years after the date you last worked or volunteered for the organisation.

**Dealing with queries, complaints or claims;** Liberty Music CIC will keep your personal information for up to 2 years after the date your query, complaint or claim was settled.

**Disposal of personal information**

At the end of the retention period digitally stored personal information will be permanently deleted. Hard copies will be fine shredded and disposed of as recyclable waste.

### **Others we share personal information with**

* Organisations we need to share information with for safeguarding reasons
* Relevant regulatory authorities
* Organisations we’re legally obliged to share personal information with
* Emergency services
* Previous employers

## **How to complain**

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we’ve used your data after raising a complaint with us, you can also complain to the ICO.

The ICO’s address:

Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: [https://www.ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint/%22%20%5Co%20%22Make%20a%20complaint)