

International School of Musician's (ISoM) Privacy and Data Protection Statement

Introduction

Our Privacy and Data Protection Statement explains the way in which we collect, use, maintain, protect and disclose your personal information.

It is important that the personal data we hold about you is accurate and current. We may contact you to ensure that the information we hold is accurate. Please do get in touch (see section 2) if your personal data has changed at any time or if you require further information about the way we collect and use your data.

This statement sets out the basis on which any personal information we hold about you will be processed by us. Please read the following carefully to understand the treatment and rights associated with your personal information

About ISoM

ISoM is an employee owned business that is dedicated to making music and music examinations accessible to anyone that wants to learn and/or complete a graded exam. Our Managing Director has been delivering these services for over a decade.

Our registered offices are outlined below:

International School of Musicians
1000 Dockside Road
Royal Docks
London E16 2QU
Company Number: 08882661

We are a registered as a Data Controller with the Information Commissioner's Office under registration reference ZA735591. Our Managing Director is also our data protection controller (DPC) and is responsible for overseeing questions in relation to this privacy notice.

If you have any questions about this privacy notice, including any requests to exercise your rights, please contact the DPC using the details set out below:

Data Protection Controller: June Fileti

Email address: info@internationalschoolofmusicians.org

Our Data Protection Commitment To You

We are committed to protecting and respecting your privacy. Everyone has rights with regard to the way in which their personal information is handled. During the course of our activities we will collect, store and process personal information about our customers, suppliers, tutors, examiners and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in ISoM and the individuals and companies that we are either working with or looking to work with.

What Personal Data Will We Collect?

Personal data is any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store, share and transfer different kinds of personal data about you which we have grouped together as:

Identity Data includes first name, last name, username or similar identifier, title, date of birth and social media account identifiers.

- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website, portal and other online resources.
- Usage Data includes information about how you use our online resources and in particular our forms, portal, website.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.
- Aggregated Data includes statistical or demographic data for any purpose. It may be derived from your personal data. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.
- We will also collect data that is defined by the Information Commissioners Office as “Special Categories” of Personal Data about you. The type of data we are likely to hold includes information about your nationality, ethnicity, gender, age.

How Do We Collect Your Personal Data?

We use different methods to collect data from and about you including:

- Direct interactions. You may give us your Identity and Contact Data by filling in forms (including web forms) or by corresponding with us by post, phone, email or otherwise.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our ‘Cookie Policy’ for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
 - Personal data gathered from social networking platforms and analytics providers such as Google, Yahoo or Firefox based inside or outside the EU/
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside of the UK.
 - Publicly available sources where you have given your consent for them to share information publicly such as online directories, professional networking organisations such as LinkedIn, identity and contact data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
 - Where you have provided your data to a third party and we act on behalf of the third party to provide advice, information or services. For example, we support educational institutions and tutors to provide music lessons and music exams to their learners.
 - Profile data where you have interacted with our website, systems or organisation. This is likely to include data such as your username, password, purchases or orders made by you, your interests, preferences, calendar information, feedback and survey responses.

Why Do We Collect And Store Your Personal Information?

We collect your data because we believe you may be interested in the services we provide or you have expressed an interest in the services we provide as a customer, supplier, user or potential user of the services provided by ISoM. This, fundamentally, is the basis for processing your data and we use it to ensure that we provide the very best possible service and that the service/product provided meets your needs. Examples of this are outlined below:

- To register you as a new client
- To process your instructions and, if accepted, to carry out our obligations under any contract(s) entered into between you and us and to provide you with the information and services that you request from us (including managing payments, fees and charges)
- To collect and recover money owed to us
- To assist us in responding to whatever query or interest you have expressed in our services
- To provide you with information about services that you request from us, where you have consented to be contacted for such purposes
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to allow you to participate in interactive features of our service, when you choose to do so, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them
- To enable you to participate in a prize draw, competition or complete a survey
- To provide you with information about special offers and other products/services that we provide that are similar to those that you have already received from us
- To provide you with information about our clients' services, to set up an appointment to discuss those services or to invite you to one of our events (for example workshops or training).
- Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.
- We may use your details for creating a profile to gauge decision-making and for direct marketing purposes. For example, using information held, we may create profiles based on the following:
 - Email Address
 - Telephone Number
 - Geographic Location
 - Job Title/Job Role

When you are not or no longer an active user of ISoM we may continue to use your personal data by satisfying the 'legitimate interest test' (further information about this can be found on the ICO's website: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/legitimate-interests/when-can-we-rely-on-legitimate-interests/>). If we use your data on this basis, we will ensure that we will limit the privacy impact on the individual and that the individual would reasonably expect ISoM to use their data in that way

Where appropriate, recipients will be given the option to opt-out of communications and ask to be removed from marketing and general communications.

Your rights

You have rights over the information that ISoM has collected from you, these include the following:

- You have a right to access the information we hold about you and ask why and how we are using your information.

- You have the right to ask us to rectify any information we hold about you that is inaccurate or incomplete.
- You have the right to ask us to erase the information we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not. Please note if you ask for your information to be erased, it may mean that we contact you about the services we provide, as we will no longer hold data about your marketing preferences.
- You have the right to ask us to stop using your information where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the right to ask us to transmit the information we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the right to object to us using/storing your information. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest that overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the right to withdraw your consent at any time.
- You have the right to object to us using/storing your information for direct marketing purposes.
- You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

If you wish to exercise any of your legal rights, please contact us by emailing us at info@internationalschoolofmusicians.org

Cookie Policy

Our website and portal uses cookies to distinguish you from other users of our website and portal. This helps us to provide you with a good experience when you browse our website and portal. Cookies allow us to improve our website and portal and if appropriate, customise around your needs. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These cookies are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

You can find out more information about the individual cookies we use and the purposes for which we use them below:

- **Cookie: Google Analytics** - Google Analytics is a simple, easy-to-use tool that helps us measure how users interact with our website content. As a user navigates between web pages, Google

Analytics provides us with JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page. The Google Analytics JavaScript libraries use HTTP Cookies to "remember" what a user has done on previous pages / interactions with our website.

- DNN (only relevant if we enable you to log into our site) - DotNetNuke uses a number of cookies, the most important of which are the forms authentication cookie (created when a user logs in) and the portal roles cookie, which stores what roles a user has access to in the current portal.
- Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Providing Your Personal Data To Others

We may disclose your personal data to our partners, suppliers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining the services we provide or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

Financial transactions relating to our website and services may be handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

We may disclose your enquiry data to one or more of the selected third party suppliers of goods and services that we work with for enabling them to contact you to fulfil a task requiring third party support.

In addition, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

How Is Personal Data Protected And Stored?

We will treat your data with the utmost care and take all appropriate steps to protect it. We work with our suppliers to ensure that we use frameworks such as the Cyber Essentials Framework and/or ISO27001 to ensure that we meet best practice principles in protecting our systems and data. We regularly monitor our system to identify ways to further strengthen security.

How Long Will We Store Your Data

The length of time that we will store your data will vary depending on how and why we collected your data and outlined below are the principles that we have in place:

- Where we use/store your data because it is necessary for the performance of the contract or delivery of services between you and us, we will use/store your data for as long as it is necessary for the performance of the service that ISoM is providing.
- Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject, we will use/store your data for as long as it is necessary for us to comply with our legal obligations
- Where we use/store your data because it is necessary for our legitimate business interests we will use/store your data until you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will continue to use

and store your data for as long as it is necessary for the performance of the contract between you and us (or earlier if we no longer have a legitimate interest in using/storing your data)

- Where we use/store your data because you have given us your specific, informed and unambiguous consent we will use/store your data until you ask us to stop.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitive nature of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Changes To Our Policy

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by email. Please check our website frequently to see any updates or changes to our policy.

Questions, comments and requests regarding this policy are welcomed and should be sent to June Fileti at info@internationalschoolofmusicians.org .