

# **Data Protection Policy for Raaga Sudha Music Academy CIC**

## **Introduction**

Raaga Sudha Music Academy CIC (Raaga Sudha) is committed to respecting the privacy of individuals, including its members.

This Privacy Notice (“**Notice**”), together with any other documents referred to in it, sets out the basis on which we process personal data, why we collect, store, use and share personal data, your rights in relation to your personal data.

For the purposes of applicable data protection law Retained Regulation (EU) 2016/679 (“**UK GDPR**”) and the Data Protection Act 2018 (“**DPA 2018**”), Raaga Sudha Music Academy CIC is the “Data Controller” of your personal data.

## **Personal Data We Collect**

We collect and process the following personal data:

- Member/Student/Artist/Teacher: Name; Home Address; Office Address (if needed); Email Address and Telephone Number.
- If you complete a form on our website; complete a survey; correspond with us by phone, e-mail, or in writing; report a problem; sign up to receive our communications; create an account with us; enter into a contract with us to receive or provide us with products and/or services; visit one of our centres: name, telephone number; email address; role.

## **Information we may collect on our website**

With regard to each of your visits to our website we may automatically collect the following information:

- Please refer to our Cookie Policy – <https://srishathyasai.org.uk/cookie-policy>
- Technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit to our website such as the services (such as membership) you searched for and view, page response times, download errors, length of visits to certain

pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

At present we do not undertake any automated decision-making processes which could result in a negative consequence.

### **Information about other people**

If you provide information to us about any person other than yourself (such as your parents/guardians etc.) you must ensure that they understand how their information will be used, and that you have the appropriate authority to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

### **Special Category Personal Data:**

In certain limited cases, we may collect certain special category personal data from you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences, or genetic or biometric data). However, we will only do so based on your explicit consent.

### **How We Use Personal Data?**

When we ask you to supply us with personal data, we will make it clear whether the personal data we are asking for must be supplied so that we can provide services to you, or whether the supply of any personal data we ask for is optional.

### **Consent:**

- where you have given your express consent to receive marketing communications, be added to mailing lists or communications groups, we may use your personal data to:
  - send you newsletters, surveys, information about our awards and local and international events related services which may be of interest to you; and
  - developing and improving and services offered by us

We only process your sensitive personal data when we have obtained your explicit consent to do so.

You have the right to withdraw your consent at any time by either contacting us using the contact information provided below.

**Legitimate interests:** These interests include managing our Academy; providing you with newsletters, surveys, information about our awards and events related to services offered by Academy which may be of interest to you; communicating with you in relation to any issues, complaints, or disputes; improving the quality of experience when you interact with services. You have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading Your rights.

**Where required by law:** We may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

### **With Whom Do We Share Personal Data?**

We may share your personal data with members to run our services and invite you to join groups. We take all reasonable steps to protect your personal data and ensure that everyone working in the Academy is aware of their information security obligations. We limit access to your personal data to those who have a genuine need to know it.

We may also share your personal data with trusted third parties including:

- for services we use such as YouTube, Facebook, Twitter and Instagram

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

We may contact you by email or post with information about activities that might be of interest to you. Where necessary, at the time that you provide your personal data to us, you will be given the opportunity to indicate whether or not you are happy for us to use your personal data in order to tell you about such activities.

You can unsubscribe from this at any time by clicking on the link provided in the relevant email, or by emailing us using the contact details provided below.

We will share personal data if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and other agreements; or if we reasonably consider this necessary; or to protect the rights, property of others.

We will share personal data with law enforcement or other authorities if required by applicable law, for example for the purposes of crime prevention and fraud protection.

## **How Long Will We Keep Personal Data?**

We will retain your personal data for as long as we believe it necessary or desirable to fulfil our business purposes or to comply with applicable law, audit requirements, regulatory requests or orders from competent courts.

Generally, we retain your personal data for 24 months from when you stop attending one of our classes or from your last interaction with us. Where there is a contract between us, we will retain your personal data for the duration of the contract, and for a period of 6 years following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities.

Where you have consented to marketing communications, you may change your preferences or unsubscribe from marketing communications at any time by responding and confirming you wish to unsubscribe.

Where possible we will anonymise or pseudonymise your personal data. Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It will then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this privacy notice though it may also be used in other ways not described here.

## **Where Do We Store Personal Data And How Is It Protected?**

We take reasonable steps to protect your personal data from loss or destruction.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure.

Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our site; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

## **Your Rights**

Under the GDPR, you have various rights with respect to our use of your personal data:

### **Right to Access**

You have the right to request a copy of the personal data that we hold about you by contacting us at the email given below. Please include with your request information that will enable us to verify your identity. We will respond with 30 days of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information or if your request is manifestly unfounded or excessive.

### **Right to rectification**

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

### **Right to erasure**

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

### **Right to object**

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using the contact details provided below.

### **Right to restrict processing**

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

## **Right to data portability**

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.

Please note that there are exceptions to these rights, if, for example, we are under a legal obligation to continue to process your personal data. If we are unable to comply with your request due to an exception we will explain this to you in our response.

## **Contact**

If you would like to contact us about this Notice, our use of your personal data, or about exercising any of your rights, please contact us by email at [raagasudhamusicacademy@gmail.com](mailto:raagasudhamusicacademy@gmail.com).

## **Complaints**

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint the applicable supervisory authority or to seek a remedy through the courts. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

## **Changes to our Notice**

Any changes we may make to our Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Notice.

## **Data Protection Policy Contact:**

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