

# Data Processing Notice

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## Who we are

Algorivm Limited  
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## What we do

Algorivm has been set up by an experienced music teacher, developing a groundbreaking artificial intelligence and machine learning digital musical analysis platform for musicians of all ages and abilities. Designed to work alongside music teachers, students and professional level musicians, it enhances and enriches the experience of teaching and learning a musical instrument by listening to musical performance (guitar, piano, or violin), notating it, and providing feedback on pitch and rhythm accuracy.

We have received a UK government Innovate UK Smart Grant to conduct a 10-week user trial of our music education software in November 2025. Working with project partners at Queen Mary University London (QMUL) and Edinburgh Napier University (ENU), we recruit students from primary schools (Years 5-6), secondary schools (Years 7-13), and private tuition (ages 10+).

QMUL has supported the AI/Machine learning elements of the project and does not process any personal data.

Algorivm works with ENU for the purposes of research and development and the parties act as joint controllers for this purpose. There is a controller/controller agreement in place for this processing.

## Our data protection responsibilities

Algorivm is a controller for the purposes of the UK GDPR.

We act as a joint controller with ENU for the purposes of the trial.

We are, at all times, mindful of our data protection responsibilities and all personal data will be processed in accordance with that legislation. Further, we commit to the standards of the ICO's Children's Code, ensuring age-appropriate design throughout the process.

## **What personal data is collected?**

Only the minimum personal data required to fulfil the specified purposes will be collected.

For the trial phase, where the student is of school age, we will require consent from the student's school **and** their parent/guardian before participating.

The student/parent/guardian will be asked to provide the student's name, school (where relevant), school year (where relevant), musical instrument and musical ability (grade).

This personal data is then used to record and track the student's progress.

## **Our responsibilities for children's data**

We work closely with schools before recruiting students.

Students of school age will only be recruited if consent is provided by a parent/guardian.

We are committed to complying with the [ICO Children's Code](#)

## **The purposes for which personal data are processed**

Personal data of students, in the form of their musical progress, is processed for the purposes of supporting them in the trial of the platform and research and development.

Personal data of parents/guardians who provide consent for the student to be recruited is processed for the purposes of assurance and governance.

Anonymised data from the trial will be used to support further research and development.

## **The lawful basis for the processing**

Personal data only is processed where consent has been provided. Consent may be withdrawn at any time.

## **What we do with personal data**

When a parent/guardian completes the application and consents for a student to be recruited, we will use the personal data provided to register the details. The personal data will be linked to recorded music practice, performance and development. This data will include feedback scores on pitch and rhythm accuracy. This anonymised data will be used for research and development purposes to help improve our technology.

### **Keeping our data secure**

All information and personal data are held securely.

### **Data retention and deletion**

Personal data processed for the purposes of the trial will be securely retained after project completion where they substantiate research findings, are of potential long-term value or support a patent for at least 10 years. Consent forms will be retained for up to 6 years after the project concludes as provided by the Prescriptions and Limitations Act.

Full assessment of the data (including personal data) and its value for the purposes of the research will be carried out at the conclusion of the project to ensure ongoing processing is lawful and the minimisation principle is complied with.

### **The partners we are working with**

Algorivm has partnered with Queen Mary University of London (QMUL) and Edinburgh Napier University (ENU).

QMUL – AI and machine learning expertise. No personal data processed.

ENU – joint controller with Algorivm. Personal data processed for the purposes of research and development.

The project will be run within a robust governance and quality control framework. The project will also be supported by partners to ensure the highest standards of technical and security expertise and provision.

Robust agreements are in place with all partners and no personal data will be transferred to jurisdictions that do not provide equivalent standards of data protection to that of the UK.

The project will involve schools directly and participation is entirely voluntary.

### **Automated decision making**

We do make use of automated processing in the context of the AI and machine learning used to support lessons. No decisions are made about the student beyond recording musical progress.

## **Supporting individuals to exercise their rights**

### **Data protection rights**

Under data protection law, individuals have rights including:

**Right of access** - the right to ask us for copies of personal information.

**Right to rectification** - the right to ask us to rectify personal information if it is inaccurate and to ask us to complete information if it is incomplete.

**Right to erasure** - the right to ask us to erase personal information in certain circumstances.

**Right to restriction of processing** - the right to ask us to restrict the processing of personal information in certain circumstances.

**Right to object to processing** – the right to object to the processing of personal information in certain circumstances.

**Right to data portability** - the right to ask that we transfer personal information to another organisation.

Individuals are not required to pay any charge for exercising rights. If a request is made, we have one month to respond.

Please contact Adam Welch at Algorivm Limited, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, [info@algorivm.com](mailto:info@algorivm.com) if you wish to make a request.

You can find out more about the data protection legislation and your rights here  
<https://ico.org.uk>

## **Queries or complaints**

If you have any concerns about our use of your personal information, please get in touch with Adam Welch at [info@algorivm.com](mailto:info@algorivm.com)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113  
ICO website: <https://www.ico.org.uk>