

Introduction

The General Data Protection Regulation (GDPR) prescribes wide-ranging data protection provisions that apply to all organisations that store / process 'personal data'.

'Personal data' is defined as *'any information relating to an identifiable person who can be directly or indirectly identified, in particular by reference to an identifier'*. This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier.

The purpose of this policy is, therefore;

- to make you aware of the GDPR and the rights that it provides you,
- to detail the nature of the personal data that I store / process and why,
- to ensure that you are aware of your rights under the GDPR and how to exercise them,
- to ensure that you are aware of my lawful basis for processing your personal data,
- to detail how I achieve 'data protection by design and default' through my personal cyber security measures.

Information I hold

In order to be able to (a) administer your / your child's tuition, (b) attend an address to deliver such tuition, (c) arrange examinations with professional examination bodies [if necessary], (d) send you relevant information and (e) receive such information from you, it is necessary for me to store / process five pieces of your personal data. These are your;

- **Name** (*defined as 'first name' and 'surname'*)
- **Postal Address**
- **Telephone Number**
- **E-mail Address**
- **Date of Birth** (*only if examinations are to be arranged*)

It is necessary to store / process these pieces of personal data in order to;

- administer your tuition (e.g. arrange lesson times, generate / send invoices and maintain financial accounts, etc.),
- attend an address to deliver your tuition,
- enrol you / your child for piano examinations with professional examination bodies [if necessary],
- send you legitimate e-mails in my capacity as a piano teacher,
- allow you to send e-mails back to me.

These pieces of your personal data are retained by me only whilst you remain a customer.

Your personal data is not shared outside of symonspiano either manually or automatically.

Lawful basis for processing

My lawful basis for processing your personal data is known as *'legitimate interests'*. This is where your personal data is used (a) in ways that you would reasonably expect and (b) with a minimal privacy impact.

The legitimate interests are;

- to allow me to administer and deliver your tuition effectively,
- to allow me to maintain reasonable business records of my activities, in satisfaction of statutory financial accounting and similar requirements,
- to allow me to contact you with useful / relevant information as a customer, via telephone or email.

It is necessary to process your personal data in order to achieve these legitimate interests as (a) your name and postal address are required in order to administer and deliver your tuition, (b) your telephone number and e-mail address are required in order to be able to send information to / receive information from you and (c) you / your child's date of birth is required in order to be able to enrol them in piano examinations [if necessary] in satisfaction of examination body requirements.

Individual rights

The GDPR provides you with rights over your personal data, which are defined as follows. They may be exercised by you, at any time, using the instructions provided.

(1) The right to be informed

- Defined as *'the right to be informed about the collection and use of your personal data'*.
- To exercise this right please read this policy in full as it details (a) what personal data I process, (b) why I process your personal data, (c) how long I retain your personal data for and (d) who it will be shared with.

(2) The right of access

- Defined as *'the right to access your personal data (commonly referred to as 'subject access')'*.
- To exercise this right please email me with your request. All materials that I hold that contain your personal data shall be sent to you.

(3) The right to rectification

- Defined as *'the right to have your inaccurate personal data rectified, or completed if it is incomplete'*.
- To exercise this right please email me your request.

(4) The right to erasure

- Defined as *'the right to have your personal data erased (commonly referred to as 'the right to be forgotten')'*.
- To exercise this right please email me your request. I will delete your personal data from all relevant materials. I will not, however, be able to delete invoices for seven years, as these are necessary to retain for statutory accounting purposes.

(5) The right to restrict processing

- Defined as *'the right to request the restriction or suppression of your personal data'*.
- To exercise this right please email me with your specific request.

(6) The right to data portability

- Defined as *'the right to obtain and reuse your personal data for your own purposes across different services'*.
- To exercise this right please email me with your specific request.

(7) The right to object

- Defined as '*the right to object to the processing of your personal data in certain circumstances*'.
- To exercise this right please email me with your specific request.

(8) Rights in relation to automated decision making and profiling

- Defined as '*the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you*'.
- Please note that automated decision making / profiling is not performed using any data held by me.

Accountability and governance

The technical and organisational measures that I have undertaken in order to protect your privacy and personal data are detailed as follows. You are able to request additional information on these measures, at any time, by contacting me.

Documentation

- This page details (a) what personal data I process, (b) why I process your personal data, (c) how long I retain your personal data for, (d) who it will be shared with, (e) my lawful basis for processing your personal data, (f) your rights and how to exercise them, (g) my accountability and governance measures and (h) the cyber security measures that I use to protect your personal data.

Data protection by design and default

- Your personal data is protected using the cyber security measures described within the '*Security*' section below.

Security

My cyber security measures are as follows;

- password / passcode protection on all computer files containing customer / student personal data,
- password / passcode protection on my mobile telephone and laptop computer,
- no hard copy / physical documents containing any customer / student personal data.

Additional information

Your personal data, as defined above, is only stored on my business email account(s), which are password / passcode protected, and on computer files (e.g. timetables, invoices, etc.) which are also password / passcode protected. I do not operate email groups or lists and always add names individually to emails that I send. Recipients of such emails are always 'blind carbon copied' (Bcc'd) into emails, such that their email addresses are not visible to any unauthorised parties.

I do not store any personal data sent to me, other than those items already referenced above. When enrolling students under the age of eighteen years for examinations, it is necessary for me to provide their date of birth to the examination body. I receive this information from the parent / guardian and delete it immediately after submitting the entry.

I do not take bank or other similar financial details from any customer (in the rare case where a refund is necessary, they are issued by cheque).

Your personal data is not shared with any other party without your prior consent (e.g., entering students for exams) unless compelled to do so via a statutory requirement under UK law.

You may have yourself removed from broadcast / group emails by request.