



## **Privacy Policy May 2018**

**(updated March 2019)**

**At the Music Education Council (MEC) we respect your right to privacy online and understand that you want to keep control of your personal information. That's why we are committed to protecting any information you share with us.**

We will never sell, distribute or intentionally make your personal information public and have implemented appropriate technical and organisational security measures to protect the data you share with us from loss and preserve its security and confidentiality. All your interactions with our website are protected by 128-bit encryption we aim to collect the minimum of personal information needed to provide an effective service.

We believe in being transparent about what data we are collecting and how it will be handled. The information below sets out our privacy policy in detail. In each case we'll explain why a particular piece of data is being processed and how long it will be retained. We are also committed to providing relevant information and control at the point of collection so that you can make informed decisions about what personal data you choose to share with us.

### **Our legal bases for processing**

We collect and process information about you only where we have legal bases for doing so. The legal basis will depend on the individual services you use and how you use them. Additional information is provided below but in general terms we will only collect and use your information where:

- It is necessary for us to provide you with a service, including for support or to protect the safety and security of the services itself.
- It satisfies a legitimate interest which is not overridden by your data protection interests. Such as for research and development.
- You have given us consent to do so for a specific purpose.
- We need to process your data to comply with a legal obligation.

In cases where you have consented to our use of your personal information for a specific purpose you have the right to change your mind at any time. Where we are using your information because we have a legitimate interest to do so, you have the right to object to that use, but in some cases this may mean you are no longer able to access our services.

## Third Party Data Processors

Like most organisations we rely on a number of third-party providers to support our day-to-day operations, for example in areas such as online file storage and email delivery. We may also hire third parties to operate, maintain or improve our website and other digital services. Some of these service providers will by necessity have access to or be directly involved in processing or storing a subset of the personal information you share with us.

All our third-party data processors have been carefully chosen as service suppliers who also practice responsible data handling. We believe that each has in place appropriate protections to ensure the security of the data we store or process with them and have clear policies for how they treat that data. But if in doubt you should review their individual Privacy Policies.

**Microsoft** (Email services and file storage) <https://privacy.microsoft.com/en-GB/privacystatement>

**Eventbrite** (Event registration):

[https://www.eventbrite.co.uk/support/articles/en\\_US/Troubleshooting/eventbrite-privacy-policy?lg=en\\_GB](https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB)

**Reg123** (Hosting & email services): <https://www.123-reg.co.uk/terms/privacy.shtml>

**Little Greenhouse** (Digital services development & support): DPA appended below.

**PayPal** (payment services) <https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev>

Before using or sharing your information with third parties in ways not described here or previously authorised by you, we will provide you with notice and an opportunity to control the further use or disclosure of your personal information.

## Transfers outside of the European Economic Area

Under certain circumstances we will transfer your information outside of the European Economic Area. We will only do this with your informed consent, when it is necessary to perform a contract we have with you or where the receiving organisation has adequate safeguards in place – for example certification under the EU-US Privacy Shield framework.

## General Browsing

Our website is hosted in Europe in a data centre managed by Little Greenhouse. When you visit our website or access one of the files stored on our web server information about this request will be automatically stored in our log files to provide usage statistics, enable security features and aid technical troubleshooting. This is on the legal basis of legitimate commercial interests. In these cases your IP address at the time acts as a unique identifier and is stored along with information about your operating system, browser version and the pages/files you access. These logs are retained on the server for up to 30 days, after which they are automatically deleted.

Our website and emails contain a number of links to third party sites. It is important to be aware that these external sites are governed by their own privacy policies and we do not accept any responsibility or liability for these policies. The inclusion of a link to an external source should not be understood to be an endorsement of that website, its owners or their products/services. Always check the individual privacy policies of these external sites before you submit any personal data through them.

## **Cookies**

Cookies are temporary files stored in your web browser by a website to help track usage and enable services that rely on a persistent identity. You can control which cookies you accept and remove them at any time by adjusting your browser settings, but it is important to be aware that some cookies are essential and our website may not function as expected without them.

### **Essential cookies**

These cookies are strictly necessary to provide you with services available through our websites and to use some of its features. But you can still block or delete them by changing your browser preferences.

- *None currently in use*

### **Non-essential cookies**

These cookies are used to enhance the performance and functionality of our websites. They are non-essential but without them certain functionality may become unavailable.

- *None currently in use*

### **Advertising cookies**

These cookies are used to make advertising messages more relevant to you and your interests.

- *None currently in use*

## **Email Marketing**

As a membership organisation, we use straightforward e-mail to facilitate communication with our members and partners. So when you choose to receive Music Education Council Member mailings as part of your membership benefits or opt-in to any Special Interest Groups, Task and Finish Groups or National Strategy Groups the email address and name you submit will be held securely on a spreadsheet held in our file storage with Microsoft. Appropriate security measures are in place to limit access to select Music Education Council staff and guard against unauthorised download or alteration of the information we hold. We will retain your personal data while you remain an active member of the Music Education Council.

You can update your details or opt-out of our emails at any time by e-mailing [admin@mec.org.uk](mailto:admin@mec.org.uk) and requesting to be removed from the mailing list. If you unsubscribe from MEC your email address will be deleted from the relevant mailing list until you actively choose to opt-in again.

## **News Item Submission**

When you submit an article to be included in our member news update the information you provide is sent to us by email.

On its way to us your message will pass through anti-spam filters operated by Microsoft to identify poor quality content or viruses. These are automated processes with no human involvement. These third parties will only access email content under very limited circumstances, such as investigating fraudulent or abusive activity.

Because your submission can include attachments and other information we can't limit what data you share with us. We request that you only share information directly relating to your submission and that you have the appropriate consent to disclose the information you share with us. It is important to be aware that email is not considered a secure means of communication so please limit the extent of the personal or commercially sensitive information you share with us this way.

### **Election Submissions**

When you submit a nomination for MEC Trustee or Forum elections the information you provide is sent to us by email. This includes your name, email address, telephone number and place of work. This information will only be used by our team for the purpose of processing the election submission.

On its way to us your message will pass through anti-spam filters operated by Microsoft to identify poor quality content or viruses. These are automated processes with no human involvement. These third parties will only access email content under very limited circumstances, such as investigating fraudulent or abusive activity.

### **Membership Application**

When you apply to become a member of the Music Education Council the details you submit, which include your name, organisation, email address, telephone number and postal address will only be used by us to process your application and keep you informed about updates relating to your membership and its benefits.

Membership data is held separately from our public website in spreadsheet form held in our file storage with Microsoft. Appropriate security measures are in place to limit access to select Music Education Council staff and guard against unauthorised download or alteration of the information we hold. We will retain your personal data while you remain an active member of the Music Education Council.

### **Membership Surveys**

From time to time the Music Education Council runs member surveys to seek views on a variety of issues. MEC uses SurveyMonkey for this so your data will pass through their US-based servers on its way to us. SurveyMonkey participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework, committing them to protect your personal data. As a data processor acting on our behalf they will not sell it to a third party, use it for marketing activities or contact you directly at any time. You can read the full detail in their Privacy Policy:

<https://www.surveymonkey.com/mp/legal/privacy-policy/>

### **Registering to Attend an Event**

Registration for our events is provided by Eventbrite so any information you submit when you book your place at one of our events (either through a form embedded in this website or directly through Eventbrite) will be processed by them in accordance with their Privacy Policy:

[https://www.eventbrite.co.uk/support/articles/en\\_US/Troubleshooting/eventbrite-privacy-policy?lg=en\\_GB](https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB)

Eventbrite is US-based company so your personal information may be transferred, processed and stored in the US. As a certified EU-US Privacy Shield Framework organisation they adhere to the principles of Notice, Choice, Accountability for Onward Transfers, Security, Data Integrity & Purpose Limitation, Access and Recourse, Enforcement & Liability when processing Personal Data from the EEA in the United States.

The information you provide during registration, which includes your name, email address and physical address, will be made available to us for our legitimate interest in keeping financial records, controlling access to our events and providing attendees with essential event information via email. If you choose to pay by invoice for your tickets we will also collect your billing contact information for the purposes of issuing the appropriate invoice.

### **Emailing Us**

When you send us an email to the address displayed on our website we will collect your email address and any other information you provide within your email.

Microsoft is our email service provider so any emails you send us will be stored on their servers. Therefore your email and any associated personal data may be transferred outside of the European Economic Area to servers located in the USA. Microsoft's certification under the EU-US Privacy Shield Framework commits it to maintaining appropriate safeguards for international data transfers. You can learn more here: <https://privacy.microsoft.com/en-GB/privacystatement>

The information you provide will only be processed in relation to the purpose of your correspondence with us. We have no fixed retention period for email correspondence, but we are committed to only storing your data for no longer than is necessary to serve our legitimate interests of record keeping or to perform a contract we have entered into with you.

### **Children Under 16**

Our website and services are not for use by children under 16 years and we will not knowingly collect or use the personal data of children. If you are under the age of 16 please do not provide any personal data even if prompted to do so.

### **Personal Data Breaches**

A breach is considered any loss, alteration, unauthorised disclosure of, or access to, personal data. We are committed to disclosing any personal data breaches that might adversely affect your rights and freedoms without undue delay so that you can take appropriate action. Any notifiable breaches will also be reported to the UK's Information Commissioner's Office within 72 hrs. This includes breaches affecting the third party services identified in this privacy policy, where personal data is being held on our behalf.

### **Questions & Access Requests**

The General Data Protection Regulation (2018) gives you the right to know what person data we hold, to have it updated if it is inaccurate or removed entirely if you no longer consent to our use of it. We will endeavour to respond to any such requests within one month confirming receipt and outlining what follow-up actions will be taken and when.

We also welcome questions about our Privacy Policy and these or any access requests should be directed to our Data Protection Office at: [admin@mec.org.uk](mailto:admin@mec.org.uk)

Music Education Council  
27 Osborne Road  
Dagenham RM9 5BB

### **Policy Changes**

Any updates we may make to our Privacy Policy in the future will be published on this page and significant changes noted below.

21 May 2018 – Expanded Privacy Policy published in preparation for the new General Data Protection Regulation.

1 March 2019 – updated to include the details of a new Digital services development & support provider.

## **Data Protection Agreement between The Music Education Council and Little Greenhouse.**

This Data Processing Agreement (herein referred to as the “DPA”) forms part of the overall Terms of Service and is made and entered into by and between Little Greenhouse, on behalf of itself and its subsidiaries, (herein referred to as “Little Greenhouse”, “we”, “our”, “ourselves”), and the Customer (herein referred to as “Customer”, “you”, “your”, “yourself”).

### **1. Further Definitions**

“the Services” means services Little Greenhouse may provide to you, collectively or separately, including cloud, web hosting, content delivery network, internet security including SSL certificates, domain registrations and other related services either by ourselves or in conjunction with partners and subsidiaries.

“Data Controller” means Customer.

“Data Processor” means Little Greenhouse.

“Directive” means the EU Data Protection Directive 95/46/EC (as amended).

“General Data Protection Regulation” means the European Union General Data Protection Regulation on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

“Local Data Protection Laws” means any subordinate legislation and regulation implementing the Directive or the General Data Protection Regulation.

“Privacy Laws” means all applicable laws, regulations, and other legal requirements relating to privacy, data security, consumer protection, marketing, promotion, and text messaging, email, and other communications; and the use, collection, retention, storage, security, disclosure, transfer, disposal, and other processing of any Personal Data.

“Data Protection Requirements” means the Directive, the General Data Protection Regulation, Local Data Protection Laws, any subordinate legislation and regulation implementing the General Data Protection Regulation, and all Privacy Laws.

“Personal Data” has meaning as given in Article 4 of the General Data Protection Regulation.

“Customer Personal Data” means Personal Data that Customer uploads or otherwise provides Little Greenhouse in connection with its use of the Services.

“Personal Data Breach” means any accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Customer Personal Data.

“Process” and its cognates has meaning as given in Article 4 of the General Data Protection Regulation.

“Subprocessor” means any entity which provides processing services to Little Greenhouse.

“Supervisory Authority” means an independent public authority which is established by a European Union member state pursuant to Article 51 of the General Data Protection Regulation.

## **2. Compliance and Use**

Customer and Little Greenhouse shall comply with their Data Protection Requirements including the General Data Protection Regulation as well as other applicable Privacy Laws. Customer acknowledges that Little Greenhouse collects and maintains records of each Data Controller and Data Processor on behalf of which Little Greenhouse acts and makes available such records to a Supervisory Authority by request. Customer intends to use the Services and in the course of doing so will upload or otherwise provide Little Greenhouse with Customer Personal Data.

## **3. Processing**

Customer shall have sole responsibility for the accuracy, quality and processing of Customer Personal Data. Little Greenhouse shall not access, use or process Customer Personal Data on behalf of Customer except as otherwise required to deliver the Services, provide technical support related to the Services and for maintenance and improvement of the Services unless otherwise directed by Customer. Customer shall determine the nature and purpose of Customer Personal Data and the categories of Data Subjects.

## **4. Data Access, Modification and Deletion**

During the course of using the Services, when Customer Personal Data is uploaded you may access, modify or delete data by logging into the Services using common protocols and tools. After Customer Personal Data has been modified or deleted the original data may continue to be retained in backup storage for up to ninety (90) days. Upon termination or expiry of the Services and upon written request by Customer, Little Greenhouse will return and delete all Customer Personal Data in its possession or control. This requirement shall not apply to the extent that Little Greenhouse is required by law to retain some or all of the Customer Personal Data, or to Customer Personal Data it has retained in backup storage, which Little Greenhouse shall take reasonable steps protect from any further processing except to the extent required by law.

## **5. Subprocessors**

Customer consents to Little Greenhouse engaging third party Subprocessors in connection with delivery of the Services. These Subprocessors may include partners and subsidiaries. Little Greenhouse maintains an up-to-date list of its Subprocessors. Customer may request information related to the appointment of new or the replacement of existing Subprocessors. Little Greenhouse will respond to reasonable requests for additional information or objections by Customer to the use of a Subprocessor.

## **6. Cooperation and Data Subjects' Rights**

Little Greenhouse shall provide reasonable and timely assistance to Customer in accordance with this DPA and the Services, to enable Customer to respond to a request from a Data Subject to exercise any of its rights under the General Data Protection Regulation (including its rights of access, correction, objection, erasure and data portability, as permitted); and any other correspondence, enquiry or complaint received from a Data Subject, regulator or other third party in connection with the processing of the Customer Personal Data. In the event that any such request, correspondence, enquiry or complaint is made directly to Little Greenhouse, Little Greenhouse shall inform Customer providing details of the same unless otherwise prohibited. Customer shall be responsible for any costs incurred by Little Greenhouse as the result of providing such assistance.



## **7. Data Protection Impact Assessment**

Little Greenhouse shall provide Customer reasonable assistance in support of a data protection impact assessment, solely in relation to Customer Personal Data, this DPA, the Services and where the Customer would not otherwise have access to the relevant information.

## **8. Confidentiality**

Little Greenhouse shall ensure that appropriate contractual obligations related to confidentiality exist with its personnel and that these survive the termination of engagement.

## **9. Security Incidents**

If Little Greenhouse becomes aware of a confirmed Personal Data Breach impacting Customer Personal Data, Little Greenhouse shall notify Customer and where possible shall provide reasonable information and cooperation to Customer so that Customer can fulfil any data breach reporting obligations it may have under the General Data Protection Regulation. Customer shall indemnify and keep indemnified Little Greenhouse against all losses with respect to any Personal Data Breach due to non-compliance by Customer with its Data Protection Requirements or violation of this DPA.

## **11. Other Obligations**

Customer shall comply with its protection, security and other obligations with respect to Personal Data prescribed by Data Protection Requirements for Data Controllers by establishing and maintaining a procedure for the exercising of the rights of the individuals whose Personal Data are processed by Customer; processing only data that has been lawfully and validly collected and ensuring that such data will be relevant and proportionate to the respective uses; ensuring compliance with the provisions of this DPA by its personnel or by any third-party accessing or using Personal Data on its behalf. Customer acknowledges it has reviewed and Consents to Little Greenhouse's separate Privacy Notice in relation to the Services and will periodically review the Privacy Notice for any changes and additions.

## **12. Audits and Inspections**

Little Greenhouse shall provide audit and inspection assistance to Customer, if requested in writing to Little Greenhouse's address of notice, to verify Little Greenhouse's compliance with its obligations under this DPA. Customer shall be responsible for any costs incurred by Little Greenhouse as the result of providing such assistance. If Little Greenhouse declines to cooperate with an audit or inspection request Customer has the rights to terminate this DPA and the Services.