

Blackheath Conservatoire of Music and the Arts

Customer Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Telephone: **020 8852 0234**

Email: **info@conservatoire.org.uk**

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Names and contact details
- Gender
- Addresses
- Date of birth
- Emergency contact details
- Next of kin details
- Photographs or video recordings
- Service use history
- Health information where these can impact the provision of activities, eg medical conditions, allergies and special educational needs.
- Dietary information, eg allergies
- Information about care needs, eg disabilities and dietary requirements
- Information about support requirements
- Records of meetings and decisions
- Information about income and financial needs for funding or eligibility for bursaries.
- Payment details where required to demonstrate fees have been paid, eg bank transfers and direct debits. Credit or debit card information is not held by the Conservatoire.
- Website user information including user journeys and cookie tracking

- Information relating to compliments or complaints

We also collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Racial or ethnic origin
- Health information

We collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Names and contact details
- Addresses
- Payment or banking details
- Donation history
- Health information
- Tax payer information, eg for Gift Aid purposes

We collect or use the following personal information for **service updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Recorded images, such as photos or videos
- Purchase history
- Donation history
- IP addresses
- Website and app user journey information
- Records of consent, where appropriate

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Identification documents
- Financial transaction information
- Health and safety information

We collect or use the following personal information for **recruitment purposes**:

- Contact details, eg name, address, telephone number or personal email address
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history. eg job application, employment references or secondary employment
- Education history. eg qualifications or students' exam results
- Right to work information
- Details of any criminal convictions, eg Disclosure Barring Service (DBS) checks

We also collect or use the following information for assessment of our **recruitment processes**:

- Racial or ethnic origin

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Witness statements and contact details
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect or use the following information for **dealing with queries, complaints or claims**:

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions

which means you may not receive all the information you ask for. [You can read more about this right here.](#)

- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods, including delivery and third party referrals** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Demographic information can help the Conservatoire understand the needs of particular communities and whether these needs are being adequately served.
 - Demographic information can help the Conservatoire assess the delivery of services throughout the communities which we serve.
 - Demographic information can provide qualitative evidence of need when the Conservatoire applies for grants or donations.
- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information to **receive donations or funding and organise fundraising activities** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information to **comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Where we get personal information from

- Directly from you
- Family members or carers
- Charities or voluntary sector organisations
- CCTV footage or other recordings
- Previous employers

How long we keep information

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. For example, details of your transactions with us will be kept for as long as we need to retain that data to comply with our legal and regulatory requirements. This is generally 7 years unless the law prescribes a longer period.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Who we share information with

Data processors

Woo Woo Ltd t/a Techsolve Ltd

This data processor does the following activities for us: Provision and management of IT, telephony and software services.

Abstract Leap Ltd

This data processor does the following activities for us: Provision of booking systems and class management software.

Stripe Payments UK Ltd

This data processor does the following activities for us: Payment Processing

Others we share personal information with:

- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations with which we are legally obliged to share personal information
- Previous employers, eg for recruitment reasons
- Suppliers and service providers
- Professional consultants

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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27 November 2024