

Charlie Wells Music Privacy Policy

Purpose of policy

I am committed to protecting your personal information and being transparent about what information I hold about you.

Using personal information allows us to develop a better understanding of our customers and in turn to provide you with relevant and timely information about the work that I do. As a sole trader, it also helps me to engage with potential customers and supporters.

The purpose of this policy is to give you a clear explanation about how I collect and use the information I collect from you directly and from third parties.

I use your information in accordance with all applicable laws concerning the protection of personal information. This policy explains:

- What information I may collect about you
- How I may use that information
- In what situations I may disclose your details to third parties
- Our use of cookies to improve your use of our website
- Information about how I keep your personal information secure, how long I maintain it for and your rights to be able to access it

If you have any queries about this policy, please contact Charlie Wells at 07830 288350 or email: charliewellsmusic@gmail.com

Who we are

I am a composer, creative producer and Arts consultant delivering projects across a range of creative disciplines, providing opportunities for participation and creating music for a wide range of situations and occasions. I am a sole trader and funded on occasion by Arts Council England, Wakefield Council, various grant-giving bodies, trusts and foundations as well as taking on corporate commissions. I do not normally sell work to individuals directly, unless by special arrangement.

Information collection

I collect various types of information and in a number of ways:

Information you give us

For example when you register on my website, buy tickets (even if they are free) enquire about performances or workshops, or register for a project I will store personal information you give to me, such as your name, email address, postal address, telephone number and bank details . I will also store a record of your bookings, purchases or donations.

Information about your interactions with us

For example, when you visit my website, I collect information about how you interact with my content. When I send you a mailing, I store a record of this, and in the case of emails I keep a record of which ones you have opened and which links you have clicked on. When you register for a project, I will store your details for as long as my project partners/funders require me to do so.

Information from third parties

I may occasionally receive information about you from third parties. Any data that I receive from these third parties you will have already given your permission to share or will be publicly available.

Sensitive personal data

Data Protection law recognises that certain categories of personal information are more sensitive such as health information, race, religious beliefs and political opinions. I do not usually collect this type of information about my participants or customers unless there is a clear reason for doing so. As an example, I may collect health information about participants in my projects - workshops, classes and courses, such as singing for lung health sessions.

Such sensitive personal data shall only be collected after having obtained your explicit consent to do so or where it is necessary to do so to comply with legal requirements. Some sensitive data is requested in our customer surveys but is analysed anonymously and there is no obligation to provide us with this information.

Use of the information

We use and process your data in the following ways:

Contract purposes/Legitimate interests

When you make a purchase from me or commission, or enquire about work from me, you are entering into a contract with me. In order to perform this contract and/or to provide you with services, I need to process and store your data. For example I may need to contact you by email or telephone in the case of cancellation of an event, or in the case of problems with your payment.

In certain situations, I collect and process your personal for other purposes that are also in our legitimate organisational interests. However, I only do this if there is no overriding prejudice to you by using your personal information in this way. I describe below all situations where we may use this basis for processing.

With your explicit consent

For any situations where information is not collected or processed as part of performance of a contract or within the scope of another legitimate organisational interest, I will ask for your explicit consent to the purpose for which I may hold or process your data before using your personal information for such purpose.

Marketing communications

I aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. To do this, I use data that I have stored about you, such as what events you have booked for in the past, as well as any preferences you may have told me about. During your first purchase or registration with us, I will give you an opportunity to opt in to receiving such communications and seek your preference on the way in which this is done (whether by telephone, email or both). You may withdraw your consent to my communicating with you for marketing purposes at any time: in the case of postal mailings, using the contact details at the end of this policy, and in the case of email, by unsubscribing via the link in every email that we subsequently send you, or you can alternatively use the contact details at the end of this policy.

Other processing activities

In addition to marketing communications, I also process personal information in the following ways for my legitimate organisational interests:

- I may analyse data I hold about you to ensure that the content and timing of communications that I send you are as relevant to you as possible.
- I may analyse data I hold about you in order to identify and prevent fraud.
- In order to improve my website I may analyse information about how you use it and the content that you interact with.
- I may use profiling techniques that will help me to communicate in a relevant way with you, in particular when I am approaching you about potential support. Such information is compiled using publicly available data about you.

In all of the above cases I will always keep your rights and interests at the forefront to ensure that your own interests or fundamental rights and freedoms are not prejudiced. You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy. Please bear in mind that if you object this may affect our ability to carry out tasks above that are for your benefit.

Third parties

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

- To our own service providers who process data on our behalf and on our instructions (for example, our ticketing system software provider). In these cases we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data.
- Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).
- To our funder Arts Council England and their partner organisations to assist them in gaining understanding of the audiences attending the arts activity they fund. In

such cases the information shared is limited (for example, to postcodes) and does not enable the identification of individual persons.

- To partner arts organisations where you have given us your explicit consent to do so.

Cookies

Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to allow a website to function (for example to keep track of your basket) as well to provide website operators with information on how the site is being used.

We use cookies to keep track of your basket as well as to identify how the website is being used and what improvements we can make.

You can manage the cookies stored on your computer or turn them off completely through your browser settings. Be aware that this may affect your browsing experience or even prevent you from using parts of our site which require a login.

Storing and securing your personal information

The data that I collect from you may be transferred to, and stored at, a destination outside the European Economic Area ('EEA'). It may also be processed by staff operating outside the EEA who work for me or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. I will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

I will only transfer your personal information outside the EEA where either:

- the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal information, or
- we have put in place our own measures to ensure adequate security as required by data protection law. These measures include ensuring that your personal information is kept safe by carrying out strict security checks on our overseas partners and suppliers, backed by strong contractual undertakings approved by the relevant regulators such as the EU style model clauses. Some US providers may also be certified under the EU-US Privacy Shield which confirms they have appropriate measures in place to ensure the protection of your data.

We will put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same.

Where I have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although I will do my best to protect your personal data, I cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once I have received your information, I will use strict procedures and security features to try to prevent unauthorised access.

I will never retain your personal information for any longer than is necessary for the purposes we need to use it for. In general terms:

- Where I have been using your personal information to provide you services (e.g. purchasing tickets), we will retain this information for a period of 7 years after the date you last used the service.
- I may hold your personal information for longer where it is necessary to do so for the management of any active or potential legal proceedings.

Your rights to your personal information

You have a right to request a copy of the personal information that I hold about you and to have any inaccuracies in this data corrected.

If there are aspects of your record that are inaccurate or that you would like to remove, you can usually do this by logging in to your account through our website. Alternatively, please use the contact details at the end of this policy.

You also have the right to object to my processing of your personal information. Any objections you make to any processing of your data will be stored against your record on our system so that I can comply with your requests.

In certain circumstances, where I have no lawful basis for retaining your personal information, you may ask me to erase your data. Similarly, where specific circumstances apply, you may ask us to restrict our uses of your personal information.

Please make any requests to exercise your privacy rights in writing using the contact details at the end of this policy. I am required to verify your identity in order to process your request and may ask you to provide valid identification documents to allow me to do so.

I will not make any charge for responding to a request from you to exercise your privacy rights, and I will respond to your request in accordance with our obligations under data protection law