



PRIVACY NOTICE – PEMBROKESHIRE MUSIC SERVICE

This privacy notice covers how Pembrokeshire County Council (as a Data Controller) will collect, use and share your personal data for the purposes of Pembrokeshire Music Service. We collect and use your personal information so that we can administer and provide you with effective and efficient Music Services.

Why we need your information (purpose of processing)

We collect and use your personal information so that we can:

- Successfully and efficiently provide you with music lessons and experiences in a variety of venues and circumstances including in school, live-streamed lessons and extracurricular activity such as County rehearsals and events.
- To meet requirements of contracts linked to the purchase an instrument from us.
- Utilise relevant material for marketing and or digital communication purposes.

The information that you provide will be processed according to the General Data Protection Regulation 2016, the Data Protection Act 2018 and the Education Act 2002.

We will also make any disclosures required by law and we may also share this information with other bodies responsible for detecting/preventing fraud/crime or auditing/administering public funds to ensure money is targeted and spent in the most appropriate and cost effective way. In order to achieve this, information will be shared with our Audit Service within Pembrokeshire County Council and with The Auditor General for Wales.

We will not make any disclosures to third parties for marketing purposes.

Your data will be secure and confidential at all times and we will only collect the personal information that is required to provide you with our service.

What personal data are being collected?

The categories of personal data being collected are:

- Contact Details (i.e. pupil names, parent / guardian details, addresses, phone numbers, email addresses)
- Pupil details (i.e. age, date of birth, school attended, instrument played, instrument grade)
- Health or medical information
- Eligibility for Free School Meals
- During Live Streamed lessons your image may be recorded for safeguarding purposes

What is our legal basis for processing your personal data?

The General Data Protection Regulations (GDPR) requires specific conditions to be met to ensure that the processing of your personal data is lawful. These relevant conditions are below:

Article 6 (1)(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose. This is in relation to any marketing and digital communications you receive from us.

Article 6 (1)(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

Article 6 (1)(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

Some types of personal data are more sensitive than others, and need more protection. This is classed as 'special category data' and could include information about your racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership and the processing of genetic or biometric data, health and sex life and sexual orientation.

We process this type of special category data as it is necessary for reasons of:

Article 9 (2)(g) Substantial public interest, for reasons of safeguarding of children and of individuals at risk, set out in Schedule 1, Part 2, paragraph 18.

Who will we share your information with?

We may need to share your personal data with internal departments, other organisations and third parties, this will include:

- Bodies responsible for detecting/preventing fraud or auditing/administering public funds to ensure money is targeted and spent in the most appropriate and cost effective way.
- We will not make any disclosures to third parties for marketing purposes, unless you have consented otherwise.

Pembrokeshire County Council has a duty to protect the public fund it manages. Therefore, the information that you have provided to us may be used for the prevention and detection of fraud and for auditing purposes both internally and externally.

How long do we keep hold of your information?

Pembrokeshire County Council will only keep your information for as long as is necessary, we will retain the information provided to us for 10 years from the start date of the file and your information will be securely disposed of once it is no longer required.

Your Rights

Under the General Data Protection Regulation 2016 and Data Protection Act 2018, you have rights as an individual including:

- The right to **Rectification** – you have the right to ask to have your information corrected.
- The right to **Restrict** processing may apply – you may request that we stop processing your personal data however, this may delay or prevent us delivering a service to you. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to **Object** – this is not an absolute right and will depend on the reason for processing your personal information.
- The right to **Erase** - you may request that we erase your personal data however, this may delay or prevent us delivering a service, or continuing to deliver a service. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to **Data portability** – you have the right to request transfer of your information without detriment.
- The right to not be subject to **Automated decision making and profiling**.

- The right of **Access** – you have the right to ask us for copies of your personal data. To make a request, please contact:
Access to Records
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP

Email: accesstorecords@pembrokeshire.gov.uk Telephone: 01437 775798

Complaints or Queries:

Pembrokeshire County Council endeavours to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this seriously. We encourage people to bring to our attention if they believe that our collection or use of information is unfair, misleading or inappropriate.

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. However we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below:

Jo Hendy, Data Protection Officer
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP

Email: dataprotection@pembrokeshire.gov.uk
Telephone: 01437 764551

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office as the statutory body which oversees data protection law:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Email: wales@ico.org.uk
Telephone No: 0303 123 1113

Our Contact Details as Data Controller are:

Pembrokeshire County Council, County Hall, Haverfordwest, Pembrokeshire, SA61 1TP.

Telephone number: 01437 764551 or enquiries@pembrokeshire.gov.uk

Our Data Protection Officer's information is detailed above in the Complaints and Queries section.

Changes to this privacy notice:

We keep our privacy notice under regular review.