



# Open Harmony CIC

## Privacy Notice

### Who we are?

We are Open Harmony CIC, a provider of Music Services and Programmes, delivering musical, creative and supportive sessions to help improve the health and wellbeing of the local community.

Our registered address is:

4 The Creative Quarter, Shrewsbury Business Park, Shrewsbury, United Kingdom, SY2 6LG

We are registered as a Data Controller with the Information Commissioners Office

– Reg No. ZA788476

### Your Privacy

Your privacy matters to us and we are committed to the highest data privacy standards, confidentiality and adherence with the Data Protection Act 2018 and UK GDPR.

To disclose this to you, our Privacy Notice includes the following:

- What data we collect from you.
- How and why we process it.
- Who we share it with and why.

We adopt the six core principles of data protection which are:

1. **Lawfulness, fairness and transparency** - we process personal data lawfully, fairly and in a transparent manner in relation to you, the data subject.
2. **Purpose limitation** - we only collect personal data for a specific, explicit and legitimate purpose. We clearly state what this purpose is in this Privacy Notice, and we only collect data for as long as necessary to complete that purpose.
3. **Data minimisation** - we ensure that personal data we process is adequate, relevant and limited to what is necessary in relation to the processing purpose.
4. **Accuracy** - we take every reasonable step to update or remove data that is inaccurate or incomplete. You have the right to request that we erase or rectify erroneous data that relates to you, and we will complete this task as soon as possible but guarantee to do so within a month.
5. **Storage limitation** - we delete personal data when we no longer need it. Whilst the timescales in most cases aren't set, we outline our retention strategy within this Privacy Notice.
6. **Integrity and confidentiality** - we keep personal data safe and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## Collection of your Personal Data

We may collect your personal information via disclosure directly from you or referral through other health and social care partners. This might be via our website, e mail, telephone or face to face engagement.

### Categories and Type of Personal Data Collected and processed.

We will collect personal information from you in order to provide information about our services and respond to your enquiries. These will include:

- Name
- Address
- Telephone number(s)
- E mail addresses
- Nature of enquiries

If you decide to become a member of one of our groups and participate in musical or arts sessions, we will need to collect more information about you, which could include:

- Name
- Address
- General Health & Wellbeing
- Age / Date of Birth
- General personal background information
- Assessment of your personal development within the group
- Assessment of any improvements in your health / wellbeing
- Photos / Video\*

\* The musical and arts sessions are in most cases video recorded and/or photographed, which helps us with our assessments and you need to be aware of this when deciding to take part in our groups. Should this concern you in any way, then please talk to us first so we can consider other options.

We recognise that some of this information is classified as 'Special Category' or that of children, which requires particular protection. We will treat all personal data in the strictest confidence.

We will need to gain additional personal information from individuals who apply to us for employment or volunteer roles, which will be relative to determining their suitability and qualification for any opportunities we have. This will include information about criminal records.

We may also capture some data which can be considered as personal data when you use our website through the use of cookies. We have provided a Cookie Policy on the website so everyone using it has the opportunity to be fully informed about the use of cookies.

Our website has links to other websites and social media platforms which we do not control and you should be aware of their Privacy policies before providing your personal information to them.

### Reason for Data collection and processing activities.

The information which we collect about you, is used to enable us to communicate with you, respond to your enquiries and provide our health / wellbeing group sessions. We will also use your information to make assessments of your progress when taking part in our sessions. We will not use your personal data for marketing purposes unless you have agreed to this.

## Sharing of your Personal Data

If you become a member of one of our groups, we may share your data with other organisations who are providing you health or wellbeing support. We are also required to share some of your information with the organisations that provide funding to us and enable us to run our group sessions. We will inform you when we intend to do this.

We actively share photos and video footage from our group sessions, through our website and social media accounts. Whilst you will not be named in these, you may be recognised by other people viewing them and if this is a concern to you, please talk to us so we can consider this.

We use data storage and communication systems provided by other companies. These companies will not normally need to access the information we hold about you but do have access to the systems to maintain them.

We may also need to share your data in order to meet our commercial legal obligations, respond to requests from regulatory bodies or authorities or for our own legal defence.

We will not share your personal data with other parties who are located outside of the European Economic Area (EEA).

A full list of organisations we share information with is available on request.

## Securing and Processing of your Personal Data

The personal data collected from you will be held securely by us and those that we share it with are contractually required to provide the same levels of security and confidentiality.

We employ a range of Technical and Organisational measures to ensure that your data remains secure and cannot be accessed by unauthorised persons, mis-used, lost or altered. Our staff and volunteers work under the provisions of strict confidentiality requirements and receive training in our data security policies and procedures.

In the unlikely event that we lose your data, or a device on which your data resides, or it is accessed by someone unauthorised, we have a duty to inform you immediately. If the loss or unauthorised access of your data has potential to cause you harm, we will also report this to the Information Commissioners Office, who are responsible for regulating data protection legislation in the UK.  
<https://ico.org.uk/>

## Our legal basis for processing your personal data

We are required to identify one of six possible legal grounds for processing. These are:

- consent
- contract
- legitimate interests
- vital interests
- public task
- legal obligation

The majority of our processing activities are crucial to the provision of our services to you, so we process your personal data on the basis of that contractual relationship.

We also process your data under our legitimate interests when utilising various third-party systems through which to provide services or communications.

We will seek your consent for use of your data prior to its use for any marketing purposes. Should we wish to use your information specifically for a published case study, in which you would be identified; we will first seek your consent to do this.

### How long do we keep your personal data for?

If we have provided our services to you, we will retain some of your data for 7 years following our last engagement, in order to satisfy our legal obligations as a business. We will not retain personal data which is not required for those purposes following our last engagement with you and it will be securely destroyed or erased from our systems.

If you made enquiries with us, we would only retain this data for as long needed to provide responses or support required.

We will only use your data for marketing purposes until such time that you withdraw your consent.

If you applied to us for employment or a volunteer role and were not successful, we will not hold your personal data for longer than twelve months.

### Your rights in relation to personal data

Under the UK GDPR, you have rights to access and control your personal data. These rights include:

- access to personal information
- correction and deletion
- withdrawal of consent (if processing data on condition of consent)
- data portability
- restriction of processing and objection
- lodging a complaint with the Information Commissioner's Office

You can exercise your rights by emailing us at:

[laura@openharmony.co.uk](mailto:laura@openharmony.co.uk)

If you are unhappy with anything we have done with your data, you have the right to complain to the Information Commissioners Office.

To make a complaint to the Information Commissioners Office use the link below or call their hotline on Tel No.: 0303 123 1113.

<https://ico.org.uk/concerns/>

### How to contact us

For all data protection matters or questions relating to how we manage your data, you can contact our responsible Director:

Responsible Director: Laura Atyeo

Email: [laura@openharmony.co.uk](mailto:laura@openharmony.co.uk)

or by writing to:

Laura Atyeo

4 The Creative Quarter, Shrewsbury Business Park, Shrewsbury, United Kingdom, SY2 6LG

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