



**apollo
music
projects**

inspiring children
through music

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www.apolloomusicprojects.org

Apollo Music Projects Privacy Policy

Introduction

Apollo Music Projects (registered charity number 1124784) is committed to safeguarding your personal information. We will only use the information that we collect about you lawfully and will keep it secure in accordance with the General Data Protection Regulation (GDPR).

Our Privacy Policy explains how we hold and use personal information and your rights and options in relation to it.

The bringing into force of the General Data Protection Regulation (GDPR) on 25th May 2018 is the basis of significant change. This Privacy Policy was updated in May 2018 to comply with GDPR but may change over time, if, for example, the Information Commissioner's Office (ICO) issues guidance that we need to follow.

Why do you collect my personal information?

Holding your personal information enables us to run the Apollo Music Projects programmes in the best possible manner, and also to fulfil our governance responsibilities as a charity.

How do you collect my personal data?

We collect personal information from you in a variety of ways: when you speak to, write to or email a trustee, member of staff or a volunteer, register on our website, donate, book for an event, subscribe to a newsletter, respond to a survey or fill out a form, offer to play in any part of the Apollo Music Projects schools programme, or agree to participate in that programme. Most of the information comes directly from yourself, but we may receive information from a third party, for example when one musician recommends another, or we may acquire it ourselves in the course of research, for example when researching funding applications.

Registered address:
43 Clifden Rd, London E5 0LL

Apollo Music Projects
is a charitable company
registered in England & Wales

Charity no. 1124784
Company no. 6585879



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**ARTS COUNCIL
ENGLAND**

LOTTERY FUNDED



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What is your legal basis for collecting and using my personal information?

The law requires us to have one or more of the 6 lawful grounds to collect and use your personal information. The following are relevant to the purposes set out above:

- Where you have given your consent. This consent can be withdrawn.
- Where there is a contract and the use is necessary for the performance of the contract or to take steps at your request prior to entering into it.
- Where there is a legal obligation. For example, to share your personal information with HMRC to process Gift Aid.
- Where Apollo Music Projects has a “legitimate interest” in the collection and use. The law allows personal information to be collected and used if it is necessary for a legitimate interest – ours are set out here in general terms. Sometimes it is not practical to ask for consent and we will rely on this legal basis. Where these situations relate to marketing and fundraising, note that you can change your preferences by contacting us (see details below).

What type of personal information do you hold?

Apollo Music Projects may hold some or all of the following personal information:

- Identity data such as your title, first name, surname, any post nominal.
- Contact data such as postal address, telephone number, email address and contact preferences.
- Transaction data such as details of any past donations if you are donor, or order details if you are a supplier.
- Financial data such as bank and payment details for staff and musicians.
- Other information such as



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- correspondence regarding the Apollo Music Projects' schools programme if you are a school representative.
- details of any previous engagements by us if you are a musician.
- details of any past volunteering you have undertaken if you are a volunteer.
- employment records if you are a member of staff.

How will you use my personal information?

- Apollo Music Projects will use your personal information for purposes specified in this Policy, including the following:
- to send you details of our work and activities that we think will be of interest to you. It's up to you to decide whether or not you want to receive this information.
- to communicate with you in general, and to manage relationships with our supporters and stakeholders.
- to contact schools about the Apollo Music Projects schools programme, for making arrangements in relation to the programme, and for collecting and processing payment for the programme.
- for fundraising purposes generally, and in particular for applying for grants or donations, for inviting donors and supporters to Apollo Music Projects school workshops, orchestra workshops, symphony concerts and other events, and for processing donations that are made.
- to book musicians, and for making payments.
- to encourage volunteers to participate at Apollo Music Projects events.
- to fulfil our legal obligations as employer towards our staff, and to pay salaries and expenses.
- to manage and record the relevant transactions with suppliers, and to make payments as required.



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Will you share my information with others?

We will not share your personal information with any third party, except under compulsion of law or where it is necessary to share it with Companies House or the Charity Commission.

What are Apollo Music Projects's legitimate interests?

We may rely on legitimate interests in pursuit of our charitable objectives, which may include the following:

- Charity governance, including delivery of our purposes, statutory and financial reporting and other regulatory compliance.
- Administration and operational management, including responding to enquires, providing information, research, donor due diligence, events management, the administration of our projects and employment and recruitment requirements.
- Fundraising, marketing and campaigning, including administering campaigns and donations.

Protecting your personal information

We take appropriate and proportionate measures to keep your personal information secure and to prevent the loss, destruction or misuse of it.

Please note that the transmission of information via the internet is never completely secure, and although we do our best to protect it, we cannot guarantee the security of personal information transmitted over the internet.

Generally, the personal information we collect is stored at a destination within the UK or European Union. We use agencies and/ or suppliers to process personal information on our behalf and so personal information may therefore be transferred, stored, or accessed outside the UK or EU. In these cases we take all steps reasonably necessary to ensure that appropriate safeguards are in place (for example, by entering into an agreement approved by the European Commission for this purpose).



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What are my privacy rights?

You have a number of rights in relation to our use of your personal information, which include the rights outlined below.

Right of Rectification

You are entitled to have personal data rectified if it is inaccurate or incomplete. We will respond within one month of your request. In the unlikely event that we do not take action on your request for rectification we will inform you of your rights to complain or seek judicial remedy.

Right of Erasure

You may request the deletion or removal of personal data where there is no compelling reason for its continued processing. This does not provide an absolute “right to be forgotten”. However you do have a right to have personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected / processed;
- When you withdraw consent;
- When you object to the processing and there is no overriding legitimate interest for continuing the processing;
- The personal data was unlawfully processed;
- The personal data has to be erased in order to comply with a legal obligation.

Right to Data Portability

You may request to obtain and reuse your personal data for your own purposes across different services. This allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. In these circumstances we will provide a copy of your data in CSV or PDF free of charge, without undue delay and within one month. If there is a delay to this you will be informed.



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This right only applies:

- To personal data you have provided to Apollo Music Projects
- Where the processing is based on your consent of for the performance of a contract and
- When processing is carried out by automated means.

Right to Object

You have the right to object to;

- Processing based on legitimate interests or the performance of a task in the public interest / exercise of official authority (including profiling).
- Direct marketing (including profiling).
- Processing for the purposes of scientific / historical research and statistics.

Right of Access

You are entitled to access your personal data so that you are aware of and can verify the lawfulness of the processing. This is achieved through the mechanism of a Subject access report (SAR) and you have the right to obtain:

- Confirmation that your data is being processed (held)
- Access to your personal data (a copy) and
- Other supplementary information that corresponds to the information permitted in this privacy notice.

To exercise any of these rights, please contact us (details below) with an explanation of the rights you wish you exercise.

To protect your personal data we will seek to verify your identity before releasing any information; this information will normally be released in electronic format.



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Under GDPR and from 25 May 2018 this information will be provided without charge, without delay and within one month. If an extension is required or requests are considered manifestly unfounded or excessive, in particular, because they are repetitive, we choose to charge a reasonable fee, taking into account the administrative costs of providing the information; or refuse to respond. The reasons for this will be formally notified to you and your rights to appeal to the appropriate Supervisory Authority, ie the ICO, will be highlighted.

Contacting us (including complaints)

If you have any questions or concerns regarding Apollo Music Projects' processing of personal information please contact David Chernaik, Chief Executive & Programme Director in one of the following ways

- by email: info@apollomusicprojects.org
- by post: Apollo Music Projects, 43 Clifden Road, London E5 0LL

Oral enquiries will be treated appropriately by Apollo Music Projects staff, although a written follow up may be requested if appropriate.

You are entitled to make a complaint at any time to the Information Commissioner's Office, the UK regulator for data privacy – www.ico.org.uk/global/contact-us. We are always grateful for the opportunity to resolve your concerns before you feel the need to speak to the ICO.

This policy has been approved and endorsed by the Board of Trustees of Apollo Music Projects in May 2018.