



National
Open Youth
Orchestra

OPEN
ORCHESTRAS

Privacy and Cookie Policy

www.openupmusic.org

www.noyo.org.uk

www.openorchestras.org

Last updated: February 2019

Our privacy and cookies policy

This document is a Privacy and Cookie Policy. The purpose of this policy is to let you know, as the user of our websites

- www.openupmusic.org
- www.openorchestras.org
- www.noyo.org.uk

This policy also explains how we collect and manage your personal data.

The overall purpose of our website is to provide information about the activities of Open Up Music.

In this Privacy and Cookie policy we also explain how we manage the personal and sensitive data of individuals who engage with Open Up Music activities.

The contact person for this policy is: Julia Le - julia@openupmusic.org

Who are we?

In this document, when you see the words 'we', 'us' or 'our', it refers to Open Up Music, the National Open Youth Orchestra or Open Orchestras.

Open Up Music is the Registered charity – no. 1167028 behind the National Open Youth Orchestra and Open Orchestras. The National Open Youth Orchestra (NOYO) is also a working name for Open Up Music.

In addition to NOYO and Open Orchestras, Open Up Music is involved in Research and Development of the Clarion, an accessible musical instrument, and related software.

We respect your right to privacy on and offline and understand that you want to keep control of your personal information. That's why we are committed to protecting any information you share with us in compliance with the [General Data Protection Regulation](#) (GDPR) and [Data Protection Act 2018](#) (DPA 2018).

Personal data – Information we collect

'Personal data' means information that identifies you as a person. This can include your name, address, email address, mobile number and other information that relates to you, as well as IP addresses and other technical information.

In some cases, it can include 'sensitive data', meaning information that may include data about physical or mental health or condition, age or ethnicity.

Through our website we collect the following personal information:

	Audience group	Categories of personal data	Purpose for processing	Legal basis for processing
1.1	Website user	Website analytics: we collect your IP address, geographical location, browser type, operating system and length of visit.	To measure the effectiveness of our website and inform improvements to the website	Legitimate interest - to communicate our core services online
1.2	Newsletter Subscriber	First name	To respond to and support your enquiry	Legitimate interest - to communicate with existing, and potential, clients
1.3	Newsletter Subscriber	Email Address		
1.4	Contact enquiry	First and last name		
1.5	Contact enquiry	Email address		
1.6	Contact enquiry	Contact number		

Applicants to our programmes

Through our website we collect the following personal information:

	Audience group	Categories of personal data	Purpose for processing	Legal basis for processing
2.0	Applicants to NOYO and Open Orchestras	Application information - the categories of information are captured in specific application forms	To enable individuals to apply for Open Up Music programmes	Legitimate interest - to engage with prospective musicians and partners

Within the context of processing invoices and payments, or for tax purposes, we may also collect financial information (e.g. bank account or credit card information).

In some instances, we will have received information about you from third parties for a specific purpose. This will only happen if you have given them permission to share your information.

Sensitive data

We are committed to ensuring equality to all, irrespective of gender, disability, ethnicity, marriage, sexual orientation, religion or belief, or social-economic background.

To do this, we may need to monitor the data trends of those applying to work with us or to participate in our programmes.

Sensitive personal information e.g. ethnicity, gender or disability is anonymised before being used for equal opportunities monitoring and reporting.

Sensitive data will only be used for other purposes if it is essential for us to deliver our service to you effectively, and if we have lawful bases to do so, as outlined in this Privacy Policy.

How we protect your data

We aim to collect the minimum of personal information needed to provide an effective service.

We will never sell, distribute or intentionally make your personal information public.

We have systems in place to safeguard your personal data. We have implemented appropriate technical and organisational security measures to protect the data you share with us from loss and preserve its security and confidentiality.

Access to written and electronic personal data is restricted and has a level of security, e.g. is password protected and encrypted depending on the sensitivity of the data.

Children and young people data – Safeguarding and consent

We collect data about children and young people from age 8 up to 25 only if we have a lawful basis and will choose the basis that provides the highest level of protection for them.

We will not knowingly collect or use the personal data of children under 16 through them browsing our websites. Personal data about children under 16 is collected through their parent or guardian.

How we use personal data

We collect and process information about you only where we have legal bases for doing so. The legal bases will depend on the individual services you use and how you use them.

Our legal bases for using your information

Consent

In some cases, we are processing your personal information because you have given us consent to do so.

Information will be presented in a clear way and we will ensure that when seeking consent from young people, they are supported through the decision-making process by us and/or their parents and guardians where legitimate.

In cases where you have consented to our use of your personal information for a specific purpose, you have the right to change your mind at any time. To withdraw consent, please email info@openupmusic.org.

Media consent

Media consent will be sought prior to any use of media we gather including, but not limited to, video, audio, photography etc. Material will only be used for as long as consent has been given, and in respect of the consent given.

Parental/guardian permission is obtained prior to filming or photographing children under 16 and young people up to the age of 25 who lack the capacity to make informed decisions themselves.

Marketing communications consent

If you have consented to us contacting you with our news and information, we will give you the chance to opt out of receiving them every time we send them.

Legitimate interests

We use your information when this is necessary for our legitimate interests, except when your interests and fundamental rights override our legitimate interests.

Specifically, we have a legitimate interest in:

- Providing you with a service: if you contact us by email about our programmes or work, we will use the personal data you provide to answer your question or resolve your problem;
- Ensuring that we have a community of supporters for our work including current and former members of our programmes, their parents, sponsors,

media, donors and collaborators; We may use profiling to ensure that communications to our supporters are relevant and well timed;

- Using your personal information to administer our events;
- Using user information to improve the content and provision of training, performances and promotional activities;
- Processing applications for auditions and admissions to the National Open Youth Orchestra or Open Orchestras programmes;
- Raising funds;
- Promoting the work of Open Up Music, The National Open Youth Orchestra and Open Orchestras through public relations and marketing; We may use your details to promote activities or events to you on social media platforms including, but not limited to twitter, Facebook, Instagram, YouTube, LinkedIn. To control our adverts on these platforms, you should amend your social media platform settings. If you send us a private or direct message through social media, the message will be stored in line with our data retention policy.

When relying on 'legitimate interests', we take responsibility for identifying the risks and consequences of the processing and put appropriate safeguards in place.

Where we are using your information because we have a legitimate interest to do so, you have the right to object to that use, but in some cases, this may mean you are no longer able to access our services.

Necessary for a contract

We will need to use your information in order to perform our obligations under a contract with you. For example, we need your name and contact details so that we can send you tickets for a performance that you want to attend.

We may also use your personal data to enforce our terms and conditions and payment procedures and collection.

Legal obligation

We need to process your data to comply with a legal obligation, including our health and safety obligations.

We may disclose your personal data if required to do so by a law enforcement court or government agency or in the good faith that such action is necessary to comply with a legal obligation, or to protect ourselves against legal liability.

Vital interests

We may use your personal information to act in urgent circumstances to protect yours or someone else's personal safety.

If we intend to use any personal data in any manner which is not consistent with this Privacy Policy, you will be informed prior to or at the time of which we collect the data; or we will obtain your consent prior to such use.

Third party data processors

All our third-party data processors have been carefully chosen as service suppliers who also practice responsible data handling. We believe that each has in place appropriate protections to ensure the security of the data we store or process with them and have clear policies for how they treat that data. But if in doubt, you should review their individual Privacy Policies.

Basecamp (Project management) <https://basecamp.com/about/policies/privacy>

Eventbrite (Event registration)
https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB

Google (Website analytics and gmail)
<https://support.google.com/analytics/answer/6004245?hl=en>
<https://policies.google.com/privacy>

MailChimp (Email marketing)
<https://mailchimp.com/legal/privacy/>

Microsoft (Email services)
<https://privacy.microsoft.com/en-GB/privacystatement>

Copper (CRM system)
<https://www.copper.com/privacy>

Pipedrive (CRM system)
<https://support.pipedrive.com/hc/en-us/articles/360000335129-Pipedrive-and-GDPR>

Wordpress (Website) <https://en.support.wordpress.com/privacy-policy-changes-faq/>

Sending your information to other countries

We may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may:

- Store your information on computer servers based overseas; or
- Communicate with you when you are overseas (for example, when you are on holiday or if you live in a different country)

Disclosure of Information - Personal data sharing

Like many organisations, we sometimes engage other people or companies to perform certain charity-related functions such as training, ticketing fulfilment,

maintaining databases and processing payments - or to work with us as delivery partners.

We may provide them with information including personal data, in connection with their performance of such functions. These organisations are only allowed to use your personal information for the specific purpose they have been contracted for.

When sharing your data with contractors or delivery partners, a GDPR compliant contract in writing will be in place between us and them, which clearly sets out the subject matter of the processing and its duration - as well as the nature and purposes of processing, the types of personal data, any special categories of data and the obligations and rights of both parties.

Your acceptance of this policy

By using our websites, social media pages; enquiring or applying for an audition or to join our programme; or by contacting us in relation to our activity or providing your information voluntarily, you consent to our collection and use of the information you provide in the way(s) set out in this policy. If you do not agree to this policy please do not use our sites, social media pages or services.

Links to other websites

This privacy policy applies only to Open Up Music, The National Open Youth Orchestra and Open Orchestras. The Open Up Music, National Open Youth Orchestra and Open Orchestras websites may contain links to third party websites not operated, nor controlled by us. Links to third party websites do not imply that we endorse or have reviewed their privacy policies.

International privacy laws

If you are visiting our website from outside the UK, please be aware that you are sending information including personal data to the UK. We will hold and process your personal data and non-personal data in accordance with privacy laws in the UK and this privacy policy.

Retention and deletion

We may retain your personal data for as long as you participate in our programmes or you agree to such retention. We may also retain personal data and non-personal data for an additional period as permitted or required by law.

When we delete your personal data, it may still exist on backup, archival, and in the case of media activity, on the Internet and social media channels when sharing was consented by you (e.g. online news articles).

Personal data breaches

A breach is considered any loss, alteration, unauthorised disclosure of, or access to, personal data.

We are committed to disclosing any personal data breaches that might adversely affect your rights and freedoms without undue delay so that you can take appropriate action. Any notifiable breaches will also be reported to the UK's Information Commissioner's Office within 72 hrs. This includes breaches affecting the third-party services identified in this Privacy Policy, where personal data is being held on our behalf.

Cookie Policy

Cookies are temporary files stored in web browsers by a website to help track usage and enable services that rely on a persistent identity. You can control which cookies to accept, block and remove at any time by adjusting browser settings.

We may use cookies to enhance the performance and functionality of our websites e.g. for the playback of embedded YouTube videos. Without them, certain functionality may become unavailable.

We do not use the information gathered through cookies to advertise to you.

Changing your cookies settings

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit www.aboutcookies.org or www.allaboutcookies.org.

Find out how to manage cookies on popular browsers:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

Questions & access requests

The General Data Protection Regulation (2018) gives you the right to know what personal data we hold, to have it updated if it is inaccurate, or removed entirely if you no longer consent to our use of it.

We will endeavour to respond to any such requests within one month confirming receipt and outlining what follow-up actions will be taken and when.

If you have any questions about our Privacy Policy, you can contact us:

By email info@openupmusic.org

By post

Open Up Music
Streamline
436-441 Paintworks
Arnos Vale
Bristol, BS4 3AS

Policy Changes

Any updates we may make to our Privacy Policy in the future will be published on this page.

Privacy policy created on 5 June 2018