
FYM Privacy Notice

1. Privacy Commitment

The Foundation for Young Musicians (herein “FYM”) is committed to safeguarding your privacy online and has developed the following Privacy Notice to remain compliant with its obligations under the Data Protection Act (“DPA”) and General Data Protection Regulation (“GDPR”). This Privacy Notice explains how, and for what purposes, the FYM uses your personal information collected about you via <http://cym.org.uk>.

FYM recognises that it is a Data Controller under the GDPR and is registered with the Information Commissioner’s Office accordingly.

This policy applies to all of the personal data that FYM holds relating to identifiable individuals. Terms used in this policy which are defined terms in the GDPR have that defined meaning.

In case of any queries or questions in relation to this policy please contact FYM using the contact details on the website.

2. Personal Information

The FYM may process a wide range of personal data of individuals donating to the FYM, pupils of the Centre for Young Musicians (herein “CYM”), their parents or guardians as part of their operation. Personal Data is biographical in a significant sense, having the data subject as its focus and affective the data subject’s privacy. It includes facts, any expression opinion about an individual and any indication of the intentions of anyone in respect of that individual. For example, names, addresses, bank details, academic and disciplinary records.

The details which you provide about yourself and any information which identifies you such as your name, address, email address, date of birth, telephone number and country of residence details will only be retained by the FYM if you provide this personal information when making donations or when asking to receive communications from the FYM.

Although it is not compulsory to provide all of this information, should you choose not to, then the FYM may not be able to provide you with the full range of services that <http://cym.org.uk> has to offer.

The FYM does not store credit card information.

3. How FYM uses your personal information

FYM will process personal data lawfully within the meaning of Art 6 of GDPR, and fairly and transparently.

FYM may use personal data for the following purposes:

- transfer information to any association, society or club set up for the purpose of maintaining contact with pupils or for fundraising, marketing or promotional purposes relating to the CYM;
- disclose photographs and names of pupils of the CYM to the media and third parties (or allow the media to take photographs of pupils) for promotional and congratulatory purposes where a pupil may be identified by name when the photograph is published e.g. where a pupil has won an award or has otherwise excelled;
- make personal data, including sensitive personal data, available to staff for planning fundraising or associated activities;
- keep the information on a database for administrative purposes;
- provide individuals with any services and/or information that have been requested;
- update individuals about any changes;
- administer donations, including Gift Aid processing;
- analyse and improve the operation of FYM website;
- ensure that targeted communications can be sent;
- contact individuals where they have been identified as a contact person for an organisation or otherwise and where individuals have indicated that they may be contacted;
- to carry out anti-money laundering and terrorist financing checks;
- as required or permitted by law.

The FYM may from time to time ask you for further information in order to update records or for particular purposes. You are under no obligation to participate and should you provide any further information, the FYM will inform you how any further information will be used.

4. Sharing your personal information

The FYM will only share your personal information in the following circumstances:

- with CYM for the purposes of stewardship, fundraising and marketing;
- you have given your consent (with regard to sensitive personal data, this may require explicit, written consent, depending on the circumstances);
- for the prevention or detection of crime;
- for the assessment of any tax or duty;
- where it is necessary to exercise a right or obligation conferred or imposed by law upon the FYM (other than an obligation imposed by contract);
- for the purpose of, or in connection with, legal proceedings (including prospective legal proceedings);
- for the purpose of obtaining legal advice; and
- for research, historical and statistical purposes (so long as this neither supports decisions in relation to individuals, nor causes substantial damage or distress).

You can limit, object or retract consent for any use of personal data by third parties at any time by contacting FYM in writing.

5. Information automatically collected from your computer

Log files/Public IP addresses: A public IP address is a unique number which allows a computer, group of computers or other internet connected device to browse to the internet. When you visit <http://cym.org.uk> the FYM's web server automatically records your public internet protocol ("IP") address and also generates a log file. The log file records the time and date of your visit, the pages that were requested, the referring website (if provided) and your internet browser version. This information is collected to help diagnose and manage the website, to audit the geographical make-up of users, and to establish how they have arrived at the website.

The FYM does not ordinarily link IP addresses to any of your personal information, which means that you remain anonymous even though the IP address is used to produce analytics information.

6. Security

The FYM takes every precaution to protect your information. To this end, FYM has implemented appropriate technologies and policies to safeguard your privacy from unauthorised access and improper use.

FYM's security objectives are to ensure:

- Confidentiality of information – access to information is restricted to those persons with appropriate authority to access it.
- Integrity of information – information shall be complete and accurate.
- Availability of information – information shall be available and delivered to the right person at the time when it is needed.

All PCs and the laptops used to process data held by FYM are protected by up to date anti-virus and anti-spyware software, subjected to regular virus scans and protected by an appropriate firewall.

7. Disclosure

Other than under section 4 above, FYM will not disclose your personal information.

8. Users Under 18

If you are under 18, please ensure that you obtain your parent/guardian's consent beforehand whenever you provide personal information. Users without such consent are not allowed to provide us with personal information.

9. Cookies

As is common practice with almost all professional websites FYM's website uses cookies, which are small files that are downloaded to your computer, to improve your experience.

FYM uses cookies for a variety of reasons detailed below. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to FYM's website. It is recommended that you leave on

all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

You can prevent the setting of cookies by adjusting the settings on your browser. Be aware that disabling cookies will affect the functionality of FYM's and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the site. Therefore, it is recommended that you do not disable cookies.

10. Third Party Websites

The FYM is not responsible for the privacy notices and practices of other organisations, including of CYM, and recommends that you check the policy of each organisation that you visit and contact its owner or Data Protection Officer if you have any concerns or questions.

11. Transferring your personal information outside of the Europe

As part of the services offered to you through the FYM website, the personal information you provide may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen if any of the computer servers used to facilitate the website are located in a country outside of the EEA. If FYM transfers your personal information outside of the EEA in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected as outlined in this privacy notice.

12. Storage of data and access to data

The data FYM controls may be divided into the following groups, according to how and where it is kept. This categorisation is not intended to be exhaustive but is intended to assist in achieving the objectives identified in this policy:

- Hard copy documents
- Electronic files (pdf, Word, spreadsheets, jpegs, PowerPoint etc) stored digitally on computers.
- Documents open for the purpose of working on them, and therefore visible on a screen.
- Emails - Emails to and from FYM and CYM staff, trustees, funders and enquiries which may sometimes involve financial information. FYM will receive, send and store emails in Outlook or Mail depending on whether the individual is using a PC or a MAC device.

All data subjects have the right to access the information FYM holds about them, except where specific exemptions apply. The board of the FYM must authorise the applicant's request for access before **any** information is disclosed.

A written response acknowledging the application form must be sent to the applicant within **5 working days** of the request.

The DPA (this may change once the GDPR is in effect) requires a response to a request to be given within **40 calendar days** of the written request being received. The 40 day period does not begin until:

- a. a written application is received by anyone within FYM (not when it has been passed on to and received by the Data Protection Officer);
- b. FYM has received sufficient information to enable it to identify the individual who is seeking access;
- c. FYM has received sufficient information to enable it to access the information requested; and
- d. where applicable the fee of £10 has been received, unless otherwise waived at FYM's discretion.

Where the conditions set out above are fulfilled, in responding to the request, FYM must confirm whether personal data is being processed and where that is the case, give a description of the personal data that is being processed, the purposes for which the personal data is being processed, and the persons to whom the personal data are or may be disclosed. FYM must also provide, in an intelligible form, a copy of the information held and, where possible, details of the source of the information. Finally, where processing results in automated decision making which evaluates matters relating to the data subject (for example, in the marking of multiple choice questions), the data subject should be informed and informed also of the logic involved in that decision-making.

13. Data retention

FYM's policy is to retain electronic data for only as long as the data is being used or for as long as the data has been authorised to be retained for.

Most of the data that FYM holds is electronic but regarding paper documents, these will be destroyed or returned to the owner of the data after the data is no longer being used for the purpose for which it was originally obtained.

The above paragraphs are not definitive, the ultimate disposal decision will have regard to:

- on-going business and accountability needs (including audit);
- current applicable legislation;
- whether the record has any long-term historical or research value;
- costs associated with continued storage.

14. Complaints

If you are not satisfied with FYM's use of your personal information, or if you believe FYM to be in breach of its data protection obligations, you have the right to complain to the Information Commissioner's Office.

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