

## Privacy Policy

New Note Projects is committed to protecting your privacy. This policy explains how we collect and use the personal information you provide to us whether online or via phone, mobile, e-mail, letter or other correspondence. We recommend that you read this policy in full, but if you do not have time, the main points are:

- your data is collected so that we can interact with you in order to tell you about our work: up and coming concerts, organising other events like open mics and telling you about our musicians
- we continue to keep your data under the 'Legitimate Interests' section in accordance with the ICO (for more info on Legitimate Interest please visit ICO site)
- we collect the minimum amount of data we need in order to do this
- your data is stored securely on password protected computers
- we keep your data as required by law and in accordance with a file retention plan
- we are careful to ensure that we only retain data and contact people who would reasonably expect to hear from us; for example, they are a New Note member, have attended events or donated, or work within mental health or drug and alcohol services
- you can ask for your details to be removed from our mailing lists at any time. You are also entitled to a copy of the data we hold about you
- by using our website, any of our services, or providing us with any personal information we will assume you are agreeing to your information being used and disclosed in the ways described in this policy.

## GDPR

Data Protection Act 2018 (DPA 2018) gives all UK citizens more rights and protections for their personal data, to minimise the possibility of theft and fraud.

These regulations include provisions for the following areas:

- **The right to be informed:** Companies must publish a privacy notice, in addition to explaining transparently how they use this personal data.
- **The right of access:** Individuals will have the right to demand details of any of their data that a company may hold. This information must be provided within one month of request and there will normally be no charge to the individual.
- **The right to rectification:** If a person's data is incorrect or incomplete, he or she has the right to have it corrected. If the company that holds the information has passed any of that information to third parties, the company must inform the third party of the correction and inform the person which third parties have their personal data.
- **The right to be forgotten:** A person may request the removal of his or her personal data in specific circumstances.
- **The right to restrict processing:** Under certain circumstances, an individual can block the processing of his or her personal data.
- **The right to data portability:** A person can access their data for their own use anywhere they prefer.
- **The right to object:** A person can object to the use of their personal data for most purposes.

**We operate our Data protection in compliance with BS 10012:217: Specification for a personal information management system.**

## **1.0 OUR CORE PRINCIPLES REGARDING USER PRIVACY AND DATA PROTECTION**

- User privacy and data protection are inviolable human rights
- We have a duty of care to people contained within our data
- Data is a liability: it should only be collected and processed when absolutely necessary
- We despise spam in all its forms
- We will never sell, rent or otherwise distribute or make public your personal information

## **2.0 RELEVANT LEGISLATION**

Alongside our business and internal computer systems, this New Note Projects website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- UK Data Protection Act 1998 (DPA)
- UK GDPR

This site's compliance with the above legislation, all elements of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (details of whom can be found in section 9.0 below) for clarification.

## **3.0 PERSONAL INFORMATION AND WHY WE COLLECT IT**

In carrying out our day to day activities we process and store personal information relating to our supporters and we are therefore required to adhere to the requirements of the Data Protection Act 1998. We take our responsibilities under this act very seriously and we ensure the personal information we obtain is held, used, transferred and otherwise processed in accordance with that Act and all other applicable data protection laws and regulations including, but not limited to, the Privacy and Electronic Communication Regulations. Our contacts database is held on a password protected computer.

This website collects and uses personal information for the following reasons:

### **3.1 Site visitation tracking**

Like most websites, this site uses Google Analytics to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although Google Analytics records data such as your approximate geographical location, device, internet browser and operating system, none of this information personally identifies you to us. Google Analytics also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see section 6.0 below).

Google Analytics makes use of cookies, details of which can be found on Google's developer guides.

Disabling cookies on your internet browser will stop Google Analytics from tracking any part of your visit to pages within this website.

### **3.2 Contact Forms and Email Links**

Should you choose to contact us using the contact form on our Contact us page or an email link like this one, none of the data that you supply will be stored by this website or passed to / be processed by any of the third party data processors defined in section 6.0. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP).

### **3.3 Email newsletter**

If you choose to join our email newsletter, your details will be added to our main contacts database. We use MailChimp to send out information. In this instance, the email address that you submit to us may be forwarded to MailChimp. We consider MailChimp to be a third party data processor (see section 6.0 below). The email address will be stored within this website's own database, which is password protected. If we are using MailChimp, your email address will remain within MailChimp's database for as long as we continue to use MailChimp's services for email marketing or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you. When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list.

If you are under 16 years of age you MUST obtain parental consent before joining our email newsletter.

While your email address remains within the MailChimp database, you will receive newsletter-style emails from us.

## **4.0 CREDIT, DEBIT CARD PAYMENT INFORMATION**

The third party we use are PayPal. PayPal process payments for any products purchased. We do not retain any financial information you may submit as part of the purchasing process.

PayPal monitor every transaction, 24/7 to prevent fraud, email phishing and identity theft. Every transaction is heavily guarded behind PayPal's advanced encryption. If something appears suspicious, their dedicated team of security specialists will identify suspicious activity and help protect you from fraudulent transactions.

## **5.0 ABOUT THIS WEBSITE'S SERVER**

Our website is hosted on a server that is managed by Godaddy.

## **6.0 OUR THIRD PARTY DATA PROCESSORS**

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in section 2.0.

- Google (view Privacy Policy)
- Mailchimp (view Privacy Policy)

## **7.0 DATA BREACHES**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, New Note Projects shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

## **8.0 YOUR RIGHTS**

You have the right to:

- request a copy of the information we hold about you;
- update or amend the information we hold about you if it is wrong;
- change your communication preferences at any time;
- ask us to remove your personal information from our records;
- object to the processing of your information for marketing purposes; or
- raise a concern or complaint about the way in which your information is being used.

## **9.0 DATA PROTECTION OFFICER and DATA CONTROLLER**

The data protection officer for New Note Projects is:

Molly Mathieson, Chief Executive  
New Note Projects, Concorde House, 18 Margaret St, Brighton BN2 1TS

Molly@newnote.co.uk

## **10.0 CHANGES TO OUR PRIVACY POLICY**

This privacy policy may change from time to time inline with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the change log below.

Last reviewed:

Next review due: