

## **PRIVACY & CCTV POLICY**

### **The Bandwagon Ltd.**

#### **INTRODUCTION**

This Privacy Policy sets out the way The Bandwagon Ltd. processes your information and details, and that of the students who use our services. We'll keep this policy updated to show you how we use your personal information so that you can be confident when sharing your information with us that it will only be used for what we say here.

#### **WHO WE ARE**

The Bandwagon is a 2016 Mercedes Sprinter Van which has been converted into a mobile music classroom, recording studio and much more. Comprising cutting edge technology and over 15 years of industry experience, the Bandwagon provides a hands-on experience for students to access and develop instrumental skills and the opportunities to refine these musical abilities in a safe, fun and inspiring way. Our company number is 10367962.

#### **LEGAL BASIS AND LEGITIMATE INTEREST**

When the Bandwagon Ltd. collects and processes your personal information, we will do this according to at least one of the legal grounds permitted in Data Protection law (GDPR as of 25th May 2018). We have a legitimate interest in collecting your information at the point of booking to process your information onto our secure system, get your child booked onto sessions and to send you payment requests. You will have provided your consent for us to collect this information via an opt-in form on our website. After 25th May 2018, new clients will have to consent separately to receive marketing emails from us, however existing customers can opt out of this at any time.

In all cases, we balance our legitimate interests against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this Policy and that does not intrude on your privacy or previously expressed marketing preferences.

#### **WHAT INFORMATION DO WE COLLECT**

This will depend on the nature of your interaction with The Bandwagon Ltd. but will as a minimum include the following information. This information may be collected from post, digital sources such as our website, telephone or SMS.

- Your name
- Contact details – telephone number and email address
- Your child’s name and instrument choice

We may also collect information under the following circumstances and only with your consent.

- If your child has any special requirements for their sessions, such as medical or learning support, then we may also require this additional information to facilitate the session.
- If your child is taking part in a Bandwagon event, we may require additional information such as emergency contact information. If emergency contact information is captured this is to be used in connection with the specific event(s) and will be deleted no later than 28 days after the event has taken place.

### **USE OF CCTV IN THE BANDWAGON**

For the comfort and safety of your children, for Child Protection purposes and for crime prevention, the Bandwagon is fully fitted with a CCTV system. You will have to provide additional consent at the point of booking to allow your child to be filmed and this consent must be given for your child to take part. The imagery captured on the CCTV system is stored securely on an CCTV server for up to 1 month. However, where a law enforcement body is investigating a crime and may ask for imagery to be preserved, then information will be retained for this time period, and then deleted once any investigation has been completed.

Individuals (or the parent/guardian of an individual if they are a child) whose information is recorded a right to be provided with that information or, if they consent to it, view that information. The Bandwagon has an obligation to provide you with this information within 40 calendar days of receiving a request and may be accompanied by a charge of no more than £10 in order for us to process the request on the CCTV system. Steps may be taken to protect the privacy of other individuals that appear on the imagery if their information or details are visible and are not needed for the purposes of your request.

### **WHAT DO WE DO WITH THE INFORMATION YOU SUPPLY?**

We use the information you supply to:

- Keep accurate records of current and active students and parents so that we can provide you with the best possible service.
- Be able to contact you in an emergency during a Bandwagon session if necessary.
- Process and send invoices for payment of Bandwagon sessions via email using our online accounts client “QuickBooks”.
- Comply with a legal duty such as crime prevention or Child Protection.

We want to provide a positive experience for you, as well as use our resources effectively.

Therefore, we may also:

- Contact you if you complete, but don't submit, an online form to see if we can assist with any problems you may be having with our website.

Where you have agreed to receive email marketing communications from us (after 25th May you will have to consent to this separately as a new client), we will add your address to a newsletter client list "MailChimp" where it will be stored securely on their servers. You can unsubscribe at any time to our marketing emails using the links in the emails or by contacting us, however if you are currently using our services, we will still need to contact you about invoices and account management.

### **WHO DO WE SHARE INFORMATION WITH?**

The Bandwagon Ltd. will not disclose any of your personally identifiable information, except in the following circumstances:

- We may need to disclose your details if required to the police, regulatory bodies or legal advisers.
- To provide you with Bandwagon services, we securely store your data on the following platforms. – MailChimp (for newsletters, account communications and enrollment data) QuickBooks (for invoicing and payment) and WordPress (if you filled in an enrolment form before 2019, or if you fill in any of our event registration forms).
- From time to time, the Bandwagon may use freelance administrators to help with the day to day running of the business. These administrators are bound under this Privacy Policy when working with The Bandwagon and will be obliged to sign a confidentiality agreement, and to show us how they will be storing your data to ensure it is safe. Once their period of work with the Bandwagon is completed, they will be required to delete any information they hold about Bandwagon clients or students.

### **HOW LONG DO WE RETAIN YOUR INFORMATION?**

We hold your information only as long as necessary for each purpose we use it. For example:

- Personal information will be held on our central databases listed above for as long as the student is actively taking part in Bandwagon sessions. Once a student decides to stop sessions, the information we hold about them and you will be held for no longer than 28 days after their last session to ensure there is time to complete any follow up work. We may however need to retain information for longer if there are any outstanding balances that are owed to us. Once full payments have been received, data will be deleted straight away if the period is then outside of the 28-day retention period.
- Emergency contact information (if it is different than the normal details we have on record for you) is only held for up to 28 days after the event has been completed, then this information is removed from our systems.
- If you request that we stop sending you marketing materials we may keep a record of your contact details and appropriate information to enable us to comply with your request not to

be contacted by us (i.e. a “no contact” list). Once you stop using the Bandwagon services, your data will be deleted from this list after the usual 28 days.

- EXCEPTION for HMRC: Our accounting and invoicing system is online (QuickBooks), and HMRC requires that accounting records be kept for a period of 6 years so that accurate VAT and tax assessments can be performed. The information held about you in QuickBooks comprises of only name, child name (for reference purposes) and email address and cannot be used for any purposes other than for keeping accurate accounting records. This data is held securely on QuickBooks’ encrypted system. You have the right to request access, alteration or deletion of this information at any time (if there are outstanding payments to be made to the Bandwagon, we may keep your data for longer until your account is clear). For more information about QuickBooks Privacy Policy, head to <https://quickbooks.intuit.com/global/privacy/>

## **MARKETING**

You are in control and you can change your preferences at any time, but we hope that you will find our communications useful and informative. You can decide not to receive marketing communications or change how we contact you at any time. If you wish to do so please contact us emailing [info@thebandwagon.uk](mailto:info@thebandwagon.uk), by writing to The Bandwagon, 10 Oak Meadow, Shipdham, Norfolk, IP25 7FD or calling 0800 520 2529 (Mon-Fri 9am-5pm).

*What do we mean by marketing?*

Marketing does not just mean offering things for sale, but also includes news and information about:

- What the Bandwagon does and any changes/updates to our services
- Updates about what the Bandwagon is working on
- Events and performances coming up
- Any special products, services or specials offers with the Bandwagon.

When you receive a communication, we may collect information about how you respond to, or interact with, that communication, and this may affect how we communicate with you in future, e.g. MailChimp, our email client, keeps statistical records of who has opened, viewed and interacted with emails that have been sent which allows us (and only us) to make sure our emails are getting through to you. This information is stored securely within Mailchimp’s encrypted servers and will never be sold to a third party. For more information about Mailchimp’s privacy policy – head to <https://mailchimp.com/legal/privacy/>

## **WE WILL KEEP YOUR INFORMATION SAFE**

We are committed to keeping your personal data safe and secure and we take all necessary steps to make sure your details are held securely. We will never sell or swap your information with charities, organisations or any third-party advertisers or marketers.

If you choose to use our Client Portal on our website (coming soon), your account is password-protected so that only you and those you designate can access it and view the member information relevant to your account. Ultimately, you are responsible for maintaining the secrecy of your passwords and any account information. We also do everything in our power to protect your information off-line, and only authorised personnel can view your data.

## **WEBSITE COOKIES**

The Bandwagon does not use cookies on its website, so you will not see a cookie consent alert when you visit the site.

## **WEBSITE FORMS**

When filling in a form on our website, your data will be sent securely to our central database stored via WordPress or Mailchimp. We make every effort to protect the loss, misuse, and alteration of the information under our control.

## **WEBSITES LINKS TO THIRD PARTIES**

We cannot be held responsible for the privacy policies of third party websites and we advise users to read the privacy policies of other websites before registering any personal data.

## **KEEPING YOUR INFORMATION UP TO DATE**

The accuracy of your information is really important to us. We want to ensure that we can communicate with you in ways that you are happy with, and to provide you with information that is of interest. If you wish to change how we communicate with you, or update the information we hold, then please contact us:

Email us at: [info@thebandwagon.uk](mailto:info@thebandwagon.uk)

Write to us at: The Bandwagon, 10 Oak Meadow, Shipdham, Norfolk, IP25 7FD

Call us on: 0800 520 2529 (Mon-Fri 9am-5pm).

You may also choose to stop receiving further marketing emails from the Bandwagon Ltd. at any time by clicking the unsubscribe link at the foot of marketing emails from us, but please be aware we will still email you with important account information and details if you are an active user of our services.

## **RIGHT OF ACCESS, CORRECTION OR DELETION OF YOUR INFORMATION**

You have a right to ask for a copy of the information we hold about you. If you spot any mistakes, please let us know and we will correct them. You also have a right to request that your data be deleted if you are no longer a user of our services. This will be done automatically 28 days after the last use of the services; however, you can request that this is done sooner.

If you want to access your information, or request early deletion of your information, send a description of the information you want to see via post to The Bandwagon, 10 Oak Meadow, Shipdham, Norfolk, IP25 7FD or email [info@thebandwagon.uk](mailto:info@thebandwagon.uk) with the subject heading "Request for my data to be accessed/deleted"

To protect your data, and that of other individuals, we may request proof of identity before making any changes to your information.

For further information see the [Information Commissioner's guidance](#)

## **CHANGES TO THIS POLICY**

We may change this Privacy Policy from time to time as we change and improve the Bandwagon's services. If we make any significant changes in the way we treat your personal information we will make this clear on The Bandwagon website and/or by contacting you directly.

***This policy was last updated on 8th March 2019.***