

Live Music Now & Live Music Now Scotland

Privacy and Data Policy

This Privacy and Data Policy refers to Live Music Now Ltd (LMN), registered in England and Wales No 1312283, registered charity number in England and Wales 273596 and Live Music Now Scotland Ltd (LMNS), registered in Scotland No SC442910, registered charity number in Scotland SC043868 and their use of the information they collect from individuals in accordance with the General Data Protection Regulation (GDPR).

LMN/LMNS will be collecting and holding personal information on four of the six legal bases (consent, contractual, legal obligation and legitimate interest) so as to deliver on its charitable objectives, which are listed on the Charity Commission as:

- 1 To advance the education of the public and promote their health and wellbeing by providing high quality interactive music performances, in particular among those members of the public who would otherwise be deprived of the benefit of performances of live music and other performing arts.
- 2 To advance the musical education of musicians at the outset of their careers as performing artists by providing them with support, specialist training and the opportunities to perform and work in public.

LMN/LMNS consider legitimate interest applies to ex-staff, alumni, and individual donors who have given £150 or more, or DD or SO payments on more than 3 occasions, within the last 6 years to specifically fund LMN's work. Such individuals, having been closely involved with the organisation, are deemed to have an active interest in, and therefore realistically expect to be kept informed of, LMN's work and progress and will be included in anonymised statistical data where relevant. Individuals may of course unsubscribe from marketing communications at any time and their data will be for LMN's internal use and not shared with any external organisations.

LMN/LMNS consider very carefully which external partners they works with in order to reach their charitable objectives. Whilst LMN/LMNS will only work with partners that provide 'sufficient guarantees' that they meet with GDPR requirements they have no direct input or control on external organisations' policies and these may change without LMN/LMNS being made aware.

How LMN/LMNS implements privacy and data protection

LMN/LMNS are committed to:

- ensuring that we comply with our data protection principles and meet our legal obligations as laid down by the GDPR.
- ensuring that data is collected and used fairly and lawfully.
- processing personal data only in order to meet our operational, contractual and reporting needs.
- taking steps to ensure that personal data is up to date and accurate.
- establishing appropriate retention periods for personal data.
- ensuring that data subjects' rights can be appropriately exercised.
- providing adequate security measures to protect personal data.
- ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues.
- ensuring that all staff are made aware of good practice in data protection.
- providing adequate training for all staff responsible for personal data.
- ensuring that everyone handling personal data knows where to find further guidance.
- ensuring that queries about data protection, internal and external to the organisation, are dealt with effectively and promptly.
- regularly reviewing data protection procedures and guidelines within the organisation.

- LMN/LMNS does not:
- collect and hold personal data of members of our audiences.
- collect and hold any data of anyone under the age of 18.
- request and hold personal data of any venue staff, other than nominated contacts.
- hold any information once it's been requested to be deleted from our system (actioned within a one-month admin period).
- give or sell our data to anyone else.

LMN/LMNS are required to report on diversity by the Charity Commission and some funders. This information will be requested directly from the relevant individuals on a case by case basis and will be held only with their specific consent.

From time to time LMN may monitor and record telephone calls for training purposes and to improve their service to you.

Website, Newsletters and Online Bookings

Individuals will be asked for certain information and personal data (such as name, email address and contact details) when they subscribe to the newsletter or sign up for a course or an event: this is facilitated through MailChimp and EventBrite platforms which have their own privacy policies.

LMN/LMNS may also record which parts of the website and services users are interested in as well as user traffic patterns and site use. All IP addresses are anonymised and LMN/LMNS uses session-based cookies only (see further information below). This information is kept securely in accordance with an internal security policy and may be used to:

- process donations, orders for products, event bookings, communications, user content, use of the website and associated services
- open and run a user account and provide an up to date, efficient and reliable service
- send promotional and marketing material in line with a user's consent
- enable us to assess and run the website to a high standard.

LMN/LMNS will never collect sensitive information about you without your explicit consent.

It is in the interest of every individual and their own responsibility to review the privacy and data policy of any website they visit: LMN/LMNS has no control nor accepts any liability in relation to unrelated websites or display advertising reached or linked to from their website.

Cookies

LMN/LMNS use session-based cookies on its website: these are a small file stored on a computer's hard drive which assigns a numerical user ID and stores certain information about an individual's online browsing. Cookies are a way that information, such as whether you have visited the website before, is recorded on a computer and these are used by LMN/LMNS to improve its website and the services available to you. If you do not wish LMN/LMNS to use cookies relating to your visit to their website please adjust your internet browser settings to not accept cookies and do not agree to the 'Allow Cookies' request. Each computer's help file will have information on how to do this but please note that this may affect your ability to use LMN/LMNS's website and its content.

By agreeing to accept cookies, you consent for LMN/LMNS and our advertising partners to place cookies on your hard drive to help analyse website traffic or let us know when you visit a particular site that is part of our advertising network. LMN/LMNS analyses the data on how people use our website for statistical analysis purposes only.

By using our site you agree to [Live Music Now's Cookie Policy](#).

Marketing Communications

LMN/LMNS gives everyone the clear opt-in choice for informing them about future events and fundraising, and other initiatives, services or related activities, and individuals may unsubscribe from these communications at any time using the links provided. LMN/LMNS will not sell, give or trade personal information to any other organisation, unless given clear consent to do so.

Social Media

LMN uses various social media platforms to help spread the message of its work and these accounts are open to public view to allow for this, unless otherwise stated. Individuals are responsible for setting their own account's security and reviewing the application's privacy policy.

Third Party software applications

LMN uses third party software for to process your data. All staff with access work within our strict password policy:

Quickbooks - financial data

Survey Monkey – evaluation data (anonymized)

Flickr – photographs *

Vimeo & You Tube – videos *

Sound Cloud – audio *

* LMN only publishes, shares and archives photos, film and audio recordings with written consent of those featured. Consent may be withdrawn at any time by emailing info@livemusicnow.org.uk.

Internal Database Records & Image Archive

Personal data is held on LMN/LMNS's internal database and is used solely to enable LMN/LMNS and their staff to achieve the charitable objectives of the organisation, held for contractual or legal obligations, in line with our legitimate interest qualifier or with your explicit consent. This database is housed on Amazon AWS, has full SSL Certification and is password protected. All LMN staff work within our strict password policy. The information on our database is for internal use only and will not be shared with any external people or organisations without your clear permission.

Data retention

LMN will hold relevant data on individuals for 6 years after the last contact (in line with HMRC requirements). After that time, records will be archived if required to be included in our statistical data reporting or deleted if they no longer have any relevance.

Accessing your data

Individuals have various rights with regard to accessing the information LMN/LMNS holds. If you wish to request access, amendment, erasure or restriction please contact the Data Officer as described at the end of this document and LMN will process your request as soon as is reasonably practicable (and within one month).

Individuals may request, in writing, to obtain a copy of the personal data that LMN/LMNS stores on them. Whilst LMN/LMNS will provide a copy for free, it does reserve the right to charge an administration fee on a case by case basis in relation to complying with such a request should it be manifestly unfounded, excessive and repetitive, or for additional copies of the same information.

Data Breaches

LMN/LMNS is committed to keep all its data secure at all times. In the event of it being informed of a data breach, LMN will move swiftly to work with its IT partner to remedy the situation and will contact those affected: this will depend on the severity and urgency of the breach and will detail the information that has been taken to enable individuals to secure their information elsewhere as necessary.

Contact

If you have any questions about this Data and Privacy Policy or want to request information on your personal data that LMN or LMNS may hold, you can do so by calling 020 7014 2829 during office hours, emailing info@livemusicnow.org.uk, or writing to The Data Officer, Live Music Now, The Music Base, Kings Place, 90 York Way, London N1 9AG.

This document is reviewed regularly and was last updated 23 May 2018.