

## **Privacy Policy**

*Effective Date: 28.10.2020*

*Updated: 01.06.2025*



**Grass Roots Music CIC** is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you engage with our services, including our music sessions, events, website, and any other activities we deliver.

This policy is written in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### **1. Who We Are**

Grass Roots Music CIC is a Community Interest Company based at:

#### **Grass Roots Music CIC**

The Custom House  
North Street  
Middlesbrough  
TS2 1JP

We provide inclusive music education, events, and community engagement projects, particularly for children, young people, and individuals with additional needs.

For the purposes of data protection legislation, we are the "data controller" of your personal data.

### **2. What Information We Collect**

We may collect and process the following types of personal data:

#### **a. Personal Information:**

- Full name
- Date of birth
- Contact details (email, phone number, address)
- Emergency contact details
- School or organisational affiliation
- Images/video footage (with consent)

#### **b. Special Category Data:**

- Health and medical information (for safeguarding purposes)
- SEND or other educational needs (where relevant)
- Ethnicity, gender, or other equality monitoring data (optional and anonymised)

**c. Digital Data (for website use):**

- IP address
- Browser type
- Pages visited
- Cookies and analytics data (see our Cookie Policy)

### **3. How We Use Your Data**

We process personal data for the following purposes:

- To deliver our music sessions, projects, and events
- To communicate with you about your participation
- For safeguarding and health & safety purposes
- To monitor and evaluate our impact (anonymised where possible)
- To comply with legal obligations
- To apply for or report on funding (with anonymised or aggregated data)
- To share updates and promotions with your consent

### **4. Lawful Bases for Processing**

Under the UK GDPR, we rely on the following lawful bases:

- **Consent:** Where we ask for your permission (e.g., photo/video consent, marketing).
- **Contract:** Where processing is necessary for delivering our services to you.
- **Legal obligation:** To comply with safeguarding, health & safety, and reporting requirements.

- **Legitimate interest:** For monitoring, evaluation, and improving our services.

## 5. How We Store Your Data

Your data is stored securely in password-protected systems or locked storage. We take appropriate technical and organisational measures to protect your information.

We keep your data for no longer than necessary. For example:

- Participant records: up to 6 years after a project ends
- Financial records: 6 years
- Media (photos/videos): until consent is withdrawn or reviewed every 3 years

## 6. Sharing Your Data

We do **not** sell or rent your personal data. We may share it with:

- Project funders or partners (anonymised unless consented)
- IT and database service providers
- Safeguarding professionals or emergency services (when necessary)
- Legal or regulatory bodies (where legally required)

## 7. Your Rights

You have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request deletion of your data (where applicable)
- Object to or restrict processing
- Withdraw consent at any time
- Lodge a complaint with the **Information Commissioner's Office (ICO)**

## 8. Children and Young People

We are especially mindful of protecting the data of under-18s. Where required, we seek parental or guardian consent for data collection and media use. We apply strict safeguarding protocols.

## **9. Contact Us**

If you have any questions or wish to exercise your data rights, please contact:

### **Grass Roots Music CIC**

The Custom House

North Street

Middlesbrough

TS2 1JP

Email: [info@grmusic.org](mailto:info@grmusic.org)

Phone: 07901534274

## **10. Changes to This Policy**

We may update this Privacy Policy from time to time. The most recent version will always be available on our website or by request.