

<p><b>Contact details of Controllers</b>  <b>Tang Hall SMART CIC</b></p>	<p><b>Tang Hall SMART CIC</b>                  Sue Williamson - Privacy Officer                  The Centre                  Mossdale Avenue                  York                  YO31 0HA                  Tel: 07725997342  <a href="mailto:sue@tanghallsmart.com">sue@tanghallsmart.com</a></p>
<p><b>Categories of Personal Data</b></p>	<ol style="list-style-type: none"> <li>1. <b>Ordinary personal data</b>- name, address, phone number, email address - and an emergency contact number.</li> <li>2. On occasions, where participants and members choose to disclose extra information in order to enhance safety/well being/progress we will also store <b>Special category</b> data such as health condition/disability status</li> <li>3. For some grant-funded programmes such as Musication we also require <b>Special category</b> data, e.g. employment status, health etc - as this is a condition of a funded placement</li> </ol> <p><i>This data is stored securely electronically with restricted access</i></p>
<p><b>Legal Basis</b></p>	<ol style="list-style-type: none"> <li>1. CONTRACT - a lot of our data control and processing is categorised under contract - in order to facilitate a service and/or transaction. We need to store the information detailed below in order to carry out business with you and manage your account. This consists in the first instance of an email address, and a phone number to send the address to - plus an emergency contact number which is required for health and safety reasons so we can contact the right person quickly in an emergency. We also need to keep a record of financial transactions where appropriate, such as when and how much amounts have been paid. There are no paper/hard copies of stored data – just the information stated above that is stored securely on our internal system and accessible only by three Tang Hall SMART staff who carry out finance/safeguarding</li> </ol>

	<p>functions. We will delete contact details in the event that a participant leaves Tang Hall SMART unless requested otherwise</p> <p>2. CONSENT - we seek consent for the following purposes:</p> <p><i>Health and educational information</i></p> <p>If you wish to provide us with extra information, for example about health, and consent to this being stored, we will store this information in the same way as stated above. We will share the information verbally with staff if you consent to this..</p> <p><i>Being informed about forthcoming events that are offered as opportunities to our participants</i></p> <p>Consent for this will ensure you are kept informed about any changes to provision, forthcoming events, and any future/opportunities provisions that may be of interest such as concerts, summer schools, occasional workshops etc.</p> <p><i>Social Media</i></p> <p>Tang Hall SMART are a music-media based business, with an associated record label, and media presence. As part of our business we produce, edit and distribute images, audio files and video online. We take care to only distribute media-images/sounds that show our participants in a positive light and are proud of our work in this area. We seek consent for permission to use data in this way for participants across our range of social-media platforms including YouTube, SoundCloud, Twitter, and our Websites. Consent can be given on a project-specific basis, or across the board.</p> <p>3. LEGITIMATE INTEREST - as well as being data controllers, Tang Hall SMART also has a data-processing relationship with York Learning (acting as data controllers) and there is a separate privacy statement with regard to this specific relationship, which is of relevance to anyone on our SMART-WAYS programme. Additionally, whenever we are gathering and storing learner records for accredited courses, we are also operating under the category of Legitimate interest. We will share information with any school that has referred (and is paying for) a learner who is registered with them, and we will also share information with exam boards. This kind of data could consist of video, audio, photographic and written evidence to be used solely for the purposes of evidencing, monitoring and reviewing progress – these records are stored securely on Google Drive. Paper records of learners' work are kept in a</p>
--	---

	secure cabinet in an office that is locked when not in use. Records are kept for the minimum period required by awarding bodies, and then deleted.
<b>Retention periods</b>	We will securely delete sensitive personal data such as EHCPs, and health/disability information three years after a participant has left Tang Hall SMART. Electronic ILR and enrolment data will be kept until it is no longer required. Learner's records will be deleted a year of a participant leaving Tang Hall SMART.
<b>Is the data transferred to other countries?</b>	We use electronic cloud storage (Google Drive) for personal data as part of our ICT system. This means personal data is potentially transferred securely to countries outside of the EU. We have a signed contract with our cloud services provider which detail how they will comply with GDPR regulations.
<b>Data Subject rights</b>	<p>Participants have the right to withdraw consent for marketing activities and for promotions such as videos/audio on our social media platforms. However, participants do not have the right to erasure as once something has been posted on the Internet, it can be shared by others.</p> <p>Participants can withdraw consent for us to store and process their personal data unless they are enrolled on a course such as SMART-WAYS - in which case they will not have the right to have their personal data deleted as we are processing this data as part of a legal obligation. (However, we will regularly review, minimise and delete data where possible after the learning has been completed.)</p> <p>Participants have the right to have their personal data rectified upon the production of suitable evidence.</p> <p>Participants have the right to access their personal data through making a data subject access request.(DSAR)</p> <p>Requests should be made via email/letter to Sue Williamson</p> <p>We will require proof of identity to establish the validity of a DSAR and the 30 day notice period to complete this will start from the time we receive this proof. There will be no charge for the initial DSAR but if the request is onerous or excessive there will be an admin cost that will be charged to the data subject.</p>