



INSPIRATIONAL  
MUSIC  
SINCE 2002

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### What is this privacy policy for?

This privacy policy governs the privacy of this website [www.hhmusic.co.uk](http://www.hhmusic.co.uk) and its users who choose to use it. The policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Website processes, stores and protects user data and information will also be detailed within this policy. This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies with UK national laws and requirements for user privacy.

### Use of cookies

This website uses cookies to enhance the user's experience while visiting the website. Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within the website. Users are advised that if they wish to decline the use and saving of cookies from this website on to their computer's hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external service providers.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and use of the website but will not store, save or collect personal information. Other cookies may be stored to your computer's hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

### Contact and communication – your personal data

Users contacting [www.hhmusic.co.uk](http://www.hhmusic.co.uk) and/or its owners do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use, as detailed in the Data Protection Act 1998. Every effort has been made to ensure a safe and secure form to email submission process, but users of such form to email processes are advised that they do so at their own risk. This website and its owners use any information submitted to provide you with further information about the products / services they offer or to assist you in answering any questions or queries you may have submitted. This includes using your details to subscribe you to any email newsletter program the website operates but only if your express permission was granted when submitting any form to email process.

Your details are not passed on to any third parties without your prior consent. Please do not supply any other person's personal data to us unless we prompt you to do so. We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). The notification data may include your name and email address. The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We will retain and delete your personal data as follows until you specifically request it to be deleted from our systems.

Your principal rights under data protection law are:

- the right to access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to object to processing;
- the right to data portability;
- the right to complain to a supervisory authority; and
- the right to withdraw consent;

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data,

together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims. In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims. You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose. To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal. You may exercise any of your rights in relation to your personal data by written notice to us or via email to the data protection officer, whose details are:

#### Data Protection Officer

Stuart McCrone: [stuart.mccrone@hhmusic.co.uk](mailto:stuart.mccrone@hhmusic.co.uk) or 03303 200 880

#### External links

Although this website only intends to include quality, safe and relevant external links, users should always adopt a policy of caution before clicking any external web links mentioned throughout this website. The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore note they click on external links at their own risk and this website and its owners cannot be held liable for any consequence of or damage caused by visiting any external links mentioned.

#### Social media platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are subject to the terms and conditions as well as the privacy policies held with each social media platform respectively. Users are advised to use social media platforms wisely and communicate/engage upon them with due care and caution in regard to their own privacy and personal details. This website or its owners will never ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email. This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

#### Shortened links in social media

This website and its owners through their social media platform accounts may share web links to relevant web pages. By default, some social media platforms shorten lengthy url's [web addresses] (this is an example: <http://bit.ly/zyVUBo>). Users are advised to exercise caution and good judgment before clicking any shortened url's published on social media platforms by this website and its owners.

Despite the best efforts to ensure only genuine url's are published many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any consequences of or damage caused by visiting any shortened links.

## Details

This website is owned and operated by BEMBENO LLP

Company registration number: OC452123

Registered Address: Durham House, 38 Street Lane, Denby, Derbyshire DE5 8NE

## Data Protection Policy

BEMBENO LLP is committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the data protection principles and the General Data Protection Regulation (GDPR).

The legal basis for processing data are as follows:

- (a) Contract: the processing is necessary for the BEMBENO LLP team member's contract and student/parent teaching contract.
- (b) Legal obligation: the processing is necessary for BEMBENO LLP to comply with the law (not including contractual obligations).

The BEMBENO LLP members responsible for data protection are mainly Stuart McCrone (Director) and Jonathan Eno BEM (CEO). However, all BEMBENO LLP team members must treat all student information in a confidential manner and follow the guidelines as set out in this document. BEMBENO LLP is also committed to ensuring that its team members are aware of data protection policies, legal requirements and adequate training is provided to them.

## Notification

Our data processing activities will be registered with the Information Commissioner's Office (ICO) as required of a recognised Data Controller.

Details are available from the ICO:

<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

Changes to the type of data processing activities being undertaken will be notified to the ICO and details amended in the register. Breaches of personal or sensitive data shall be notified within 72 hours to the individual(s) concerned and the ICO.

## Personal and Sensitive Data

All data within BEMBENO LLP control shall be identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates. The definitions of personal and sensitive data shall be as those published by the ICO for guidance:

<https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

The principles of the Data Protection Act shall be applied to all data processed:

- ensure that data is fairly and lawfully processed
- process data only for limited purposes
- ensure that all data processed is adequate, relevant and not excessive
- ensure that data processed is accurate
- not keep data longer than is necessary
- process the data in accordance with the data subject's rights
- ensure that data is secure
- ensure that data is not transferred without adequate protection.

## Children

It is necessary for BEMBENO LLP to hold limited data about children (under 16) including name and date of birth. No information will be held other than that provided by the parent/guardian and it will be treated in the same way as all sensitive data as set out in this policy.

## Fair Processing/Privacy Notice

BEMBENO LLP will be transparent about the intended processing of data and communicate these intentions via notification to team members, parents and pupils prior to the processing of individual's data. Notifications shall be in accordance with ICO guidance and, where relevant, be written in a form understandable by those defined as 'Children' under the legislation.

<https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-noticestransparency-and-control/>

There may be circumstances where BEMBENO LLP is required either by law or in the best interests of our students or staff to pass information onto external authorities, for example local authorities. These authorities are up to date with data protection law and have their own policies relating to the protection of any data that they receive or collect. The intention to share data relating to individuals to an organisation outside of BEMBENO LLP shall be clearly defined within notifications and details of the basis for sharing given. Data will be shared with external parties in circumstances where it is a legal requirement to provide such information.

#### Data Access Requests (Subject Access Requests)

All individuals whose data is held by us, has a legal right to request access to such data or information about what is held. We shall respond to such requests within one month and they should be made in writing to:

Stuart McCrone  
BEMBENO LLP  
2 Seasons Close,  
Uttoxeter  
Staffordshire  
ST14 7FF

No charge will be applied to process the request.

Personal data about pupils will not be disclosed to third parties without the consent of the child's parent or carer, unless it is obliged by law or in the best interest of the child.

#### Data Security and Location

Hard copy data, records, and personal information are stored out of sight and in a locked filing cabinet.

BEMBENO LLP acknowledges that some staff may need to transport data between schools and their home in order to access it for work.

The following guidelines are in place for BEMBENO LLP team members in order to reduce the risk of personal data being compromised: BEMBENO LLP office or team members' home. If these are misplaced or lost they are at risk. If there is no way to avoid transporting a paper copy of data, the information should not be on view in public places, or left unattended under any circumstances;

· Unwanted paper copies of data, sensitive information or pupil files should be shredded. This also applies to handwritten notes if the notes

reference any other staff member or pupil by name;

· Care must be taken to ensure that printouts of any personal or sensitive information are not left in printer trays or photocopiers;

· If information is being viewed on a shared PC, BEMBENO LLP team members must ensure that the window and documents are properly shut down before leaving the computer (password protected) unattended. Sensitive information should not be viewed on public computers;

· If it is necessary to transport data, it should be downloaded onto a USB stick. The data should not be transferred from this stick onto any

public computers. Work should be edited from the USB, and saved onto the password protected USB only;

· USB sticks that staff use must be password protected;

· When using data to contact more than one parent, BEMBENO LLP team members must ensure that they blind copy (Bcc:) all recipients to avoid the sharing of personal data; These guidelines have been clearly communicated to all BEMBENO LLP team members, and any person who is found to be intentionally breaching this conduct will be disciplined in line with the seriousness of their misconduct.

#### Data Disposal

BEMBENO LLP recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk. All data held in any form of media (paper, tape, electronic) shall only be passed to a certified disposal partner with demonstrable competence in providing secure disposal services. All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.

Disposal of IT assets holding data shall be in compliance with ICO guidance:

[https://ico.org.uk/media/fororganisations/documents/1570/it\\_asset\\_disposal\\_for\\_organisations.pdf](https://ico.org.uk/media/fororganisations/documents/1570/it_asset_disposal_for_organisations.pdf)

BEMBENO LLP has identified a qualified source for disposal of IT assets and collections.

BEMBENO LLP also uses Confidential Document Shredding to dispose of sensitive data that is no longer required.

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