

MUSICOPOLIS LIMITED

DATA PROTECTION AND PRIVACY POLICY NOTICE

MUSICOPOLIS LIMITED, a company registered in Cyprus with registration number HE 357783 (hereinafter “Musicopolis”) is a private educational music institution based in Nicosia, Cyprus. which offers either at its premises or online educational music lessons to its students and organises music events with the participation of its students and staff.

MUSICOPOLIS values the privacy of every person and is committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller. The handling of such data is in line with the data protection principles set out in the General Data Protection Regulation (GDPR) approved by the EU Parliament on 14 April 2016.

This Privacy Policy explains the types of information Musicopolis collects, how Musicopolis may use that information, and with whom Musicopolis may share it.

This Privacy Policy also describes the measures Musicopolis takes to protect the security of the information and explains how you can contact Musicopolis to get answers to questions you may have about Musicopolis’ privacy practices.

This policy will be regularly reviewed and updated to take into account new laws and technology and the changing Musicopolis environment when required. Please ensure you have the current version of this Policy.

Musicopolis holds information on students in order to support their teaching and learning, to monitor and report their progress, to provide appropriate care and to assess how well Musicopolis as a whole is doing.

In addition, Musicopolis will occasionally include information or images of the students in Musicopolis literature or on Musicopolis website. Please let Musicopolis know if this represents a problem to you and Musicopolis will take steps to ensure this information is not included. Parents and/or holders of parental responsibility need to be aware that at times Musicopolis may be legally bound to provide information to other bodies such as the Ministry of Education and Culture and the Social Insurance Services, which Musicopolis will try to do with the knowledge of the relevant parents or holders of parental responsibility.

Musicopolis collects the following type of information:

For Students and their representatives:

1. Names
2. Addresses
3. E-mail Addresses
4. Phone numbers
5. Characteristics (such as age, gender, language)
6. Special educational needs (including the needs and ranking)
7. Attendance (such as sessions attended, number of absences, absence reasons)
8. Assessment and attainment and any relevant results
9. For students’ representatives: occupation

For member of staff:

1. Personal information (such as name, employee or teacher number, national insurance number)
2. Characteristics information (such as gender, age, ethnic group)
3. Contract information (such as start date, hours worked, post, roles and salary information)
4. Work absence information (such as number of absences and reasons)
5. Qualifications (and, where relevant, subjects taught)

Musicopolis collects information in a number of ways, including:

1. in person
2. over the phone: from students and their family, staff, volunteers and visitors
3. from electronic and paper documentation: including emails, invoices, enrolment forms, letters to our Musicopolis, consent forms, application forms, our Musicopolis's website or Musicopolis-controlled social media through online tools: such as apps, forms and other software used by Musicopolis
4. use or view Musicopolis's website via your browser's cookies

Collection notices

When Musicopolis collects information about you, Musicopolis takes reasonable steps to advise you of certain matters. This includes the purpose of the collection, and how to access, update and correct information held about you. For information about students and their families, a collection notice is provided to parents (or mature minor students) upon enrolment.

Unsolicited information about you

Musicopolis may receive information about you that we have taken no active steps to collect. If permitted or required by law, our Musicopolis may keep records of this information. If not, we will destroy or de-identify the information when practicable, lawful and reasonable to do so.

Why does Musicopolis collect this information?**Primary purposes of collecting information for Students:**

Musicopolis collects information about students and their families when necessary to:

1. educate students and support their educational programs in person or online
2. monitor and report their progress
3. support students' social and emotional wellbeing, and health
4. fulfil legal requirements, including to:
 - take reasonable steps to reduce the risk of reasonably foreseeable harm to students, staff and visitors (duty of care)
 - make reasonable adjustments for students with disabilities (anti discrimination law)
 - provide a safe and secure workplace (occupational health and safety law)
 - assess the quality of Musicopolis's services
5. enable Musicopolis to:

- communicate with parents about students' matters and celebrate the efforts and achievements of students
 - maintain the good order and management of Musicopolis
6. enable Musicopolis to:
 - ensure the effective management, resourcing and administration of Musicopolis
 - fulfil statutory functions and duties
 - plan, fund, monitor, regulate and evaluate Musicopolis's policies, services and functions
 - comply with reporting requirements
 - investigate incidents in Musicopolis and/or respond to any legal claims against Musicopolis.
 7. for marketing communication purposes directly related to Musicopolis.
 8. organise music events and shows with the participation of the students who provided their consent

Primary purposes of collecting information about others:

Musicopolis collects information about staff, volunteers and job applicants:

1. to assess applicants' suitability for employment or volunteering
2. to administer employment or volunteer placement
3. to enable individuals to be paid
4. for insurance purposes
5. to fulfil various legal obligations, including employment and contractual obligations, occupational health and safety law and to investigate incidents
6. to respond to legal claims against Musicopolis
7. enable the development of a comprehensive picture of the workforce and how it is deployed
8. for marketing communication purposes directly related to Musicopolis.

Important for Members of Staff:

Workforce data is essential for Musicopolis's operational use.

Whilst the majority of personal information provided to Musicopolis by members of staff is mandatory, some of it is requested on a voluntary basis. In order to comply with GDPR, Musicopolis will inform the members of staff at the point of collection, whether they are required to provide certain information to Musicopolis or if they have a choice in this and Musicopolis will tell them what they need to do if they do not want to share this information with the Musicopolis.

When does Musicopolis use or disclose information?

Musicopolis uses or discloses information consistent with GDPR, as follows:

1. for a primary purpose – as defined above
2. for a related secondary purpose that is reasonably to be expected – for example, to enable Musicopolis to fulfil its objectives, functions and powers
3. with notice and/or consent – including consent provided on enrolment and other forms
4. when necessary to lessen or prevent a serious threat to:

- a person's life, health, safety or welfare
- the public's health, safety or welfare

Who Musicopolis shares student information with:

Musicopolis may disclose personal information, including sensitive information, held about an individual for educational, legal, administrative, marketing and support purposes.

This may include to:

1. government departments (including for policy and funding purposes)
2. medical practitioners
3. people providing educational or support services to Musicopolis, including specialist visiting teachers, volunteers, counsellors and providers of learning and assessment tools
4. educational authorities, including the Ministry of Education
5. people providing educational, administrative and financial services to Musicopolis
6. recipients of Musicopolis publications, such as newsletters and magazines
7. students' parents or guardians
8. anyone you authorise Musicopolis to disclose information to
9. anyone to whom Musicopolis is required, or authorised, to disclose the information to by law (including child protection laws).

IMPORTANT: Musicopolis does not share information about the Students with anyone without consent unless the law and our policies allow Musicopolis to do so.

Online education

Musicopolis and its staff may use third party programs or applications or websites for the provision of online education to its students.

Musicopolis's marketing

Musicopolis publications like newsletters and magazines (both hard-copy and electronic) as well as online available videos and images which include personal information, may be used for marketing purposes.

If you would like to opt-out of direct marketing please contact admin@musicopolis.com.cy .

How long is the personal data stored?

Musicopolis will retain any personal data only for the period necessary to fulfil the purposes outlined in this Privacy Policy Notice unless a longer retention period is required by law.

For members of staff: at the end of their contractual relation with Musicopolis, a member of staff's data and more specifically details of their identity card, bank account, social insurance number, occupation and nationality will be retained for a period of six (6) years according to the national laws. In case legal reasons exist, the data will be kept until such matter is completed and will subsequently then be erased.

Access to student information

Musicopolis only provides Musicopolis reports and ordinary Musicopolis communications to parents/holder of parental responsibility who have a legal right to that information.

Access to staff information

Musicopolis staff may first seek access to their personnel file by contacting the principal. If direct access is not granted, the staff member may request access through the Data Protection Officer.

Storing and securing information

Musicopolis takes reasonable steps to protect information from misuse and loss, and from unauthorised access, modification and disclosure. Musicopolis stores all paper and electronic records securely following the security standards.

When using software and contracted service providers to manage information, Musicopolis assesses these according to the appropriate departmental processes.

Updating your information

Musicopolis endeavours to ensure that information about students, their families and staff is accurate, complete and up to date. To update your information, please contact admin@musicopolis.com.cy

Requesting access to your personal data

Under GDPR, parents, students and members of staff have the right to request access to information about them that Musicopolis holds. To make a request for your personal information, or be given access to your child's educational record, contact admin@musicopolis.com.cy

Depending on the lawful basis above, you may also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing

- object to decisions being taken by automated means and
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at commissioner@dataprotection.gov.cy

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting admin@musicopolis.com.cy

Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on 19 June 2020

Contact

If you would like to discuss anything in this privacy notice, please contact admin@musicopolis.com.cy

Information Unit

Students, their Representatives and/or Member of Staff as data subjects have certain rights, including a general right of access to personal data held on them, with parents/holders of parental responsibility exercising this right on their behalf if they are too young to do so themselves. If you wish to access the personal data held about you or your child, or you have any query or complain, please contact:

EMAIL: admin@musicopolis.com.cy