

## British Suzuki Music Association GDPR Policy

Date: September 2025

### Introduction

The BSMA is committed to protecting the privacy and personal data of all individuals we interact with, including children, teachers, families, and other stakeholders. This policy outlines how we comply with the UK General Data Protection Regulation (UK-GDPR) and the Data Protection Act 2018 to ensure personal data is handled lawfully, fairly, and transparently.

### Scope

This policy applies to all personal data processed by the BSMA, including but not limited to:

- Children participating in our music programmes and workshops
- Teachers and volunteers supporting our activities
- Families and guardians of children involved in our charity
- Donors, supporters, and other stakeholders

### Data We Collect

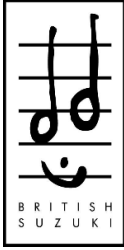
We may collect and process the following types of personal data:

- Children and young people: Name, age and date of birth, gender, emergency contact information, medical information, including SEND, allergies (if required for safeguarding), images, video, or audio recordings (with consent)
- Teachers/Volunteers: Name, training level/role, contact details, DBS check information, qualifications, financial details necessary for fee or other types of payment (training courses, workshop attendance, membership, donation as examples), consent records and references.
- Families/Parents/Carers/ Guardians: Name, contact details, relationship to the child, financial details necessary for fee or other types of payment (workshops, membership, donation as examples) and consent forms.
- Donors/Supporters: Name, contact details, donation history, and Gift Aid declarations.

### Legal Basis for Processing

We process personal data under the following legal bases:

- **Consent** (Article 6(1)(a)) – for activities requiring explicit consent, such as photography, direct marketing, or sharing certain data.
- **Contract** (Article 6(1)(b)) – where data processing is necessary to deliver a service
- **Legal obligation** (Article 6(1)(c)) – for safeguarding, health & safety, financial reporting or DBS checks.
- **Vital interests** (Article 6(1)(d)) – in emergencies.



- **Legitimate interests** (Article 6(1)(f)) – to manage our charity effectively, including communication with stakeholders and in running and improving our programmes.
- **Explicit consent** (Article 9(2)(a)) – for special category data (e.g. medical information, SEND).

### **How We Use Personal Data**

We use personal data to:

- Deliver workshops both residential and non-residential and related activities.
- Manage programme logistics (e.g. attendance, transportation, health information)
- Ensure the safety and wellbeing of children.
- Communicate with families, teachers, and supporters.
- Maintain accurate records for operational and legal purposes.
- Promote our activities (only with appropriate consent)
- Monitor and evaluate our impact

### **Data Sharing**

We only share personal data when necessary and with appropriate safeguards in place:

- Internally: Among staff, teachers, trustees and volunteers on a need-to-know basis.
- Externally: With event venues, safeguarding authorities, medical professionals in case of emergencies or service providers (e.g., IT support and cloud-based databases, with appropriate data processing agreements) where required.

We do not sell or share personal data for marketing purposes.

### **Data Retention**

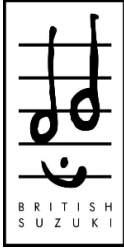
We retain personal data only as long as necessary or as required by law:

- Children's data: Retained for the duration of their BSMA membership and up to 5 years after.
- Teacher data: Retained for 5 years after their BSMA membership ends.
- Donor/Supporter data: Retained for 6 years to comply with financial regulations.
- Safeguarding records: Retained for 25 years or in line with statutory guidance.
- Consent forms: Retained for 3 years or until withdrawn.

### **Data Security**

We implement appropriate technical and organisational measures to protect personal data, including:

- Secure storage of physical and digital records.
- Password-protected systems and encrypted communications.
- Staff training on data protection and safeguarding.



### **Rights of Individuals**

Individuals have the following rights under GDPR:

- Access: To request a copy of their personal data.
- Rectification: To correct inaccurate or incomplete data.
- Erasure: To request deletion of their data (subject to legal obligations).
- Restriction: To limit how their data is processed.
- Objection: To object to data processing based on legitimate interests.
- Data Portability: To request transfer of their data to another organisation.

Requests can be made by contacting us at: [admin@britishsuzuki.com](mailto:admin@britishsuzuki.com)

### **Consent and Safeguarding**

For children under 13, we obtain consent from a parent, carer or guardian before processing their data. We ensure all activities comply with safeguarding policies and procedures.

### **Data Breaches**

In the event of a data breach, we will:

- Notify the Information Commissioner's Office (ICO) within 72 hours if required.
- Inform affected individuals of their confidential data being leaked.
- Take immediate steps to mitigate the breach and prevent recurrence.

### **Contact Information**

For questions, concerns, or to exercise your rights, please contact:

Nickie Chapman

Email: [admin@britishsuzuki.com](mailto:admin@britishsuzuki.com)

The BSMA is committed to upholding the highest standards of data protection and safeguarding. This policy will be reviewed annually or as required by changes in legislation.