The Music Works – Privacy Policy

1. Who we are and how to contact us

This policy explains how The Music Works looks after the personal information of our students, their parents and guardians, and visitors to our website. We have written it for parents, in plain English. If anything is unclear, please ask us.

The Music Works is a trading name of **Orpheus Music Ltd**, a not-for-profit private company limited by guarantee, registered in England and Wales (company number 11674267). We are the "controller" of your personal information, which means we decide how and why it is used.

- **Registered office:** Rodborough School, Rake Lane, Milford, Surrey, GU8 5BZ
- **Main teaching centre and postal address:** The Music Works, Rodborough School, Rake Lane, Milford, Surrey, GU8 5BZ
- **Email:** contact@themusicworks.uk
- **Phone:** 01483 516060
- **Person responsible for data protection:** Kyle MacKenzie, Director. Email dataprotection@themusicworks.uk. We have not appointed a formal Data Protection Officer because the law does not require us to, but Kyle is responsible for how we handle personal information.
- **ICO registration:** We are registered with the ICO, registration number ZB049542.

We follow the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 (PECR), and the changes made to those laws by the Data (Use and Access) Act 2025.

This policy covers personal information we collect when you enquire about or book lessons, attend our centres, in-school lessons, workshops, roadshows or showcases, buy a gift voucher, or use our website. It does not cover other websites we link to. Please read it alongside our Cookie Policy and our Terms and Conditions.

2. What information we collect and where it comes from

We only collect what we need to run lessons safely, take payment and keep you informed. Depending on how you deal with us, this may include:

- **Parent or guardian details:** name, address, email, phone number, relationship to the student, and emergency contacts.
- **Student details:** name, date of birth or age, school and school year (for in-school lessons), instrument, level, lesson group, attendance, progress notes and exam entries (for example RSL or Yamaha courses).
- **Health and support information:** medical conditions, allergies, special educational needs (SEN) or other information you choose to give us so we can keep your child safe and support their learning. See section 3.
- **Photo and video consent choices**, and photos or videos taken at lessons, showcases, workshops and roadshows (see section 3).
- **Account and payment information:** bookings, membership and billing history, payment status and gift voucher purchases. Card payments are handled by Stripe. When you book a free taster lesson, our booking system asks for a payment card, which Stripe saves securely with a £0 charge, so that continuing to weekly lessons is simple. We cannot see your full card details, and we never take a payment without your explicit agreement.
- **Communications:** emails, messages, enquiry forms, quiz answers and notes of phone calls.
- **Marketing preferences:** whether you have agreed to, or opted out of, marketing emails and texts.
- **Website and device information:** pages viewed, how you arrived at our site, approximate location, device and browser type, and cookie identifiers (see section 6).

- **Reviews:** if you leave us a review, your name and review content as shown on the review platform.

What you must give us. To accept a booking we need a parent or guardian's name and contact details, the student's name and age, and an emergency contact. Without these we cannot provide lessons. Everything else, such as health and support information, photo consent and marketing choices, is optional, although if we do not know about a medical need we may not be able to keep your child safe.

Where it comes from. Most information comes directly from you: when you enquire, complete our "find your class" quiz, claim a free lesson, book, register, buy a gift voucher, or talk to us. Some comes from:

- your child's teachers (progress, attendance and observations);
- schools that arrange in-school lessons with us (for example, names and year groups of pupils taking part, and relevant medical or support information);
- the person who bought a gift voucher for you (your name and email, so we can send it);
- exam boards such as RSL Awards (exam results);
- advertising and analytics providers such as Google and Meta (for example, that someone clicked one of our adverts), where you have agreed to marketing cookies.

3. Children's information

Most of our students are children, some as young as four. We take extra care with their information.

> **If you are a student, here is the short version.** We keep your name, age, instrument, lesson times and how you are getting on, so your teacher can teach you. Your parent or guardian gives us this and looks after your account. We only share it when we need to, for example with an exam board when you take an exam, or to keep you safe. We will not put your photo online unless your parent or guardian says yes, and you can ask them to change that. If you have a question or are worried about anything, talk to your teacher, your parent or guardian, or email us.

Parents and guardians provide it. For students under 18, we collect information from a parent or guardian, who books, pays and manages the account. We do not ask children to give us personal information directly online. Students aged 13 and over may contact their teacher about lessons through Opus1 messaging, for lesson matters only, with their parent or guardian's agreement and in line with our Safeguarding Policy. Teachers do not exchange personal phone numbers, email addresses or social media details with students. The account stays with the parent or guardian. Adult students (18+) manage their own accounts.

Children's rights. Personal information about a child belongs to the child. Parents and guardians can usually exercise rights on behalf of a younger child. As children grow older and can understand their rights (often from around age 12), we may ask for the child's view or deal with them directly where that is in their best interests.

Health, medical and SEN information. Some information, such as medical conditions, allergies, disabilities or special educational needs, is "special category" information under UK GDPR and gets extra protection. We only ask for it so we can keep students safe and adapt lessons to support them. We use it:

- with your **explicit consent**, which you give separately when you provide it at registration (UK GDPR Article 9(2)(a));
- where we cannot get consent, or asking for it would put a child at risk, under the "safeguarding of children and individuals at risk" condition in Schedule 1 of the Data Protection Act 2018;
- where needed to protect a child's vital interests in an emergency, for example sharing allergy information with paramedics (Article 9(2)(c)); and
- where we need to keep a record of an accident or incident in case of a legal claim (Article 9(2)(f)).

Only staff who need it, such as your child's teacher and our centre managers, can see it. You can update it or ask us to remove it at any time, but if we do not know about a medical need we may not be able to keep your child safe.

Safeguarding. We have a duty to keep children safe. Our Designated Safeguarding Lead is Kyle MacKenzie (dsl@themusicworks.uk). If we have a safeguarding concern, we may record it and share information with the local authority's children's services, the police or the child's school, without telling you first if that could put a child at risk. We do this under our legal obligations and the "recognised legitimate interests" for safeguarding and emergencies set out in the Data (Use and Access) Act 2025, and, for special category information, the safeguarding conditions in Schedule 1 of the Data Protection Act 2018. You can read our Safeguarding Policy on our website.

Photos and videos. We sometimes take photos and videos at lessons, showcases, workshops and roadshows.

- **For our website, social media, adverts or printed materials:** we will only use images in which your child can be identified if you have given consent. You make separate choices for our website, social media and adverts in your Opus1 account, and you can change your mind at any time. If you withdraw consent, we will stop using the image in new materials and remove it from our website and social media accounts where we reasonably can, but we cannot recall printed materials already distributed.
- **We will not** publish a child's full name alongside their image, or any other details that would show where they can be found.
- **For teaching** (for example, a teacher filming a student's playing to track progress or prepare an exam entry): in line with our Safeguarding Policy, we only film with your consent, recorded in your Opus1 account. If a teacher uses their own phone, it must be locked, and they must send the recording to us within 7 days and then delete it from the phone and any cloud backup. These recordings are never published and are kept only as long as needed (see section 9).
- **At showcases and public events,** other parents and audience members may take their own photos or videos. We ask them to respect families' wishes and only share images of their own child, but we cannot control what others do. Please speak to us if there is a reason your child must not be photographed.

Schools. When we teach in schools, the school may share pupil names, year groups and relevant medical or support information with us so that we can run the lessons safely. Parents book and pay for in-school lessons with us directly, so we are responsible for the information we hold, and the school is responsible for its own records.

4. How we use your information and our lawful basis

The law says we must have a valid reason, called a "lawful basis", for each way we use personal information. These are the bases we rely on:

- **Contract:** we need it to provide the lessons or services you have asked for, or to take steps before you book (UK GDPR Article 6(1)(b)).
- **Legitimate interests:** we have a genuine business reason that does not override your rights; you can object (Article 6(1)(f)).
- **Recognised legitimate interests:** a short list of purposes the law treats as legitimate without a balancing test, including safeguarding vulnerable people, emergencies and preventing crime (Article 6(1)(ea)).
- **Consent:** you have said yes, and you can withdraw at any time (Article 6(1)(a)).
- **Legal obligation:** the law requires it (Article 6(1)(c)).
- **Vital interests:** it is needed to protect someone's life (Article 6(1)(d)).

What we do	Information used	Lawful basis
Respond to enquiries, free-lesson requests and the "find your class" quiz	Parent name, contact details, child's age, instrument interest, quiz answers	Contract (steps before booking); legitimate interests (responding to people who contact us)

What we do	Information used	Lawful basis
Book, schedule and deliver lessons, courses, workshops and showcases	Parent and student details, lesson group, attendance, progress notes	Contract
Deliver in-school lessons	Pupil names, year groups, attendance, progress, relevant medical or support information	Contract (parents book and pay for these lessons with us)
Keep students safe and support their learning	Emergency contacts; medical, allergy and SEN information	Contract and vital interests; for health or SEN information, explicit consent, the DPA 2018 Schedule 1 safeguarding condition where consent cannot be obtained, vital interests in an emergency, and legal claims for incident records
Safeguarding children	Any relevant information, including concerns and records	Legal obligation; recognised legitimate interests (safeguarding); DPA 2018 Schedule 1 safeguarding conditions for special category data
Film students for teaching and exam preparation	Video and audio of the student playing	Consent
Take payment, save a card when you book a free taster lesson, manage memberships and recover unpaid fees	Billing contact, payment history, Stripe payment references	Contract; legitimate interests (recovering debts)
Sell and redeem gift vouchers	Buyer's and recipient's names and email addresses, order details	Contract (buyer); legitimate interests (delivering the voucher to the recipient)
Service messages (timetable changes, cancellations, invoices, policy updates)	Contact details, booking information	Contract; legitimate interests
Enter students for exams	Student name, date of birth, exam details	Contract
Use photos and videos in publicity, on our website and social media	Images and video of students	Consent
Send marketing emails and texts (news, offers, events)	Name, email, phone, marketing preferences	Consent, or the "soft opt-in" for existing customers (see section 5); legitimate interests for keeping a suppression list
Website analytics (Google Analytics 4)	Cookie identifiers, pages viewed, device and approximate location	Consent via our cookie banner (see section 6)
Advertising and remarketing (Google Ads, Meta pixel) and measuring advert performance	Cookie identifiers, website activity, ad clicks	Consent via our cookie banner
Show reviews on our website (ReputationHub) and invite reviews	Name, review content, contact details for review invitations	Legitimate interests
Keep accounts, tax and business records	Billing and transaction records	Legal obligation
Handle complaints, legal claims and insurance	Any relevant information	Legitimate interests; legal obligation
Keep our systems and data secure	Account logins, technical logs	Legitimate interests; legal obligation

Where we rely on legitimate interests, we have weighed our interests against yours, taking particular care where the information is about a child. You can ask us for details of that assessment.

We do not make decisions about you based solely on automated processing that have legal or similarly significant effects.

5. Marketing emails and texts

We would like to tell you about new classes, holiday workshops, showcases and offers. We send marketing emails and texts through Opus1, and we follow the Privacy and Electronic Communications Regulations (PECR).

- **If you are a customer** (you have booked or bought lessons, a course, a workshop or a gift voucher from us), we may email or text you about our own similar music lessons and events. This is called the "soft opt-in". We give you the chance to say no when we first collect your details, and in every message we send.
- **If you are not a customer** (for example, you claimed a free trial lesson, completed our quiz, took part in a roadshow or entered a competition), we will only send you marketing if you have ticked a box to say yes.
- **We never** sell your details or let other organisations send you their marketing.
- **We do not** send marketing to children.

Opting out is easy and free. Every marketing email has an "unsubscribe" link and every text tells you how to stop messages (for example, reply STOP). You can also change your preferences in your Opus1 account or contact us at contact@themusicworks.uk or 01483 516060. Unsubscribe links take effect straight away; requests made to us directly are actioned within 5 working days.

If you opt out, we keep a note of your email address or phone number on a suppression list so we do not contact you again by mistake. You will still receive essential service messages about lessons you have booked, such as cancellations, timetable changes and invoices; these are not marketing.

6. Cookies, analytics and advertising

Our website uses cookies and similar technologies. Our cookie banner (provided by Complianz) lets you choose which ones to allow. Apart from cookies that are strictly necessary to make the site work, we only set them if you agree. You can change your choices at any time using the "Manage consent" link at the bottom of every page. Full details are in our Cookie Policy.

- **Google Analytics 4** tells us how people use our site (for example, which pages are popular) so we can improve it. It only runs if you accept statistics cookies.
- **Google Ads** conversion tracking and remarketing help us see whether our adverts work and show our adverts to people who have visited our site. They only run if you accept marketing cookies.
- **Meta (Facebook and Instagram) pixel** measures how our Meta adverts perform and may be used to show you our adverts. It only fires after you accept marketing cookies.
- **Google Consent Mode:** we load Google tools through Google Tag Manager and Google Site Kit using Google's "basic" Consent Mode. This means Google's tags do not load and send nothing to Google until you accept the relevant cookies.
- **involve.me** (our "find your class" quiz), **Opus1** (booking and lead forms), **Gift Up** (gift vouchers) and the **ReputationHub** reviews widget may set their own cookies needed for these features to work.

Google and Meta act as independent controllers for some of this information and use it under their own privacy policies: Google Privacy Policy and Meta Privacy Policy. You can also manage ad personalisation in your Google ad settings and your Meta account settings.

We do not use these technologies to build profiles of children, and our adverts are aimed at parents and adult learners.

7. Who we share your information with

We never sell your personal information. We share it only where we need to, and only what is needed.

Our suppliers (processors). These organisations handle information on our behalf, under contract, and may only use it as we instruct:

Supplier	What they do for us	Where data may be processed
Opus1	Enquiry and booking forms, student and parent records, member accounts, billing, messages between teachers and families, emails and texts	United States
Stripe (via Opus1)	Card and direct debit payments, including saving cards. Stripe also uses some information for its own fraud prevention and legal checks, under its own privacy policy	UK, EU and US
Jotform	Our membership cancellation form	UK, EU or US
Google Workspace	Our taster lesson form, and a copy of cancellation form responses (Google Forms and Sheets)	UK, EU and US
involve.me	"Find your class" quiz and lead form on our website	UK, EU or US
Gift Up	Selling and managing gift vouchers	UK, EU or US
ReputationHub	Reviews widget and review invitations	UK, EU or US
Hosting.com	Hosting our website	UK, EU or US
Microsoft 365	Our business email and documents	UK and EU
Xero	Our accounts and invoicing	Outside the UK, including New Zealand and the US
Our bookkeeper and accountant	Bookkeeping, accounts and tax	UK

Google and Meta. Where you accept marketing or statistics cookies, Google (Analytics and Ads) and Meta receive website information as described in section 6. For some purposes they act as separate controllers.

Other people we may share with:

- **Teachers** who teach your child, so they can run lessons and contact you about them. Some of our teachers are self-employed; they are bound by a written agreement to keep your information confidential and delete it when they stop teaching for us.
- **Schools** where we provide in-school lessons, to report attendance and progress.
- **Exam boards** such as RSL Awards, and **Yamaha Music** for the Yamaha Junior Music Course, where your child is entered for exams or a Yamaha programme (usually name, date of birth and exam or course details).
- **Emergency services and health professionals** if a student is unwell or injured.
- **Children's services, the police and other authorities** for safeguarding or where the law requires it.
- **HMRC, regulators, courts, insurers and professional advisers** where needed for legal, tax or insurance reasons.
- **A buyer or successor organisation** if our activities are ever transferred, in which case your information would continue to be protected.

8. Information sent outside the UK

Some of our suppliers, including Opus1, Jotform, Google, Meta, Stripe and Xero, may store or access personal information outside the UK, mainly in the European Economic Area (EEA) and the United States.

When this happens, we make sure the information is protected to UK standards by using one of these safeguards:

- **UK "data bridge" (adequacy) decisions:** the UK government has decided that countries such as those in the EEA protect personal information adequately.
- **The UK–US data bridge:** transfers to US companies that have certified to the UK Extension of the EU–US Data Privacy Framework.

- **Contract terms approved under UK law:** the International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses, where a supplier is not covered by a data bridge.

You can contact us for more information about the safeguards we use for a particular supplier.

9. How long we keep information and how we protect it

We keep personal information only as long as we need it, then delete or anonymise it securely.

Information	How long we keep it
Customer account, booking and billing records	Up to 6 years after you stop having lessons with us (for tax, accounting and legal claims)
Enquiries and free-lesson requests that do not lead to a booking	If you agreed to marketing, we keep your contact details until you unsubscribe. If you didn't, and you didn't go on to book lessons, we delete them after 3 years with no contact
Medical, allergy and SEN information	We keep it on your child's account while they have lessons with us. Because of how our booking system works, it stays with their account record until we delete the account, up to 6 years after lessons end. It is visible only to our staff. If you'd like it removed sooner, just ask and we'll arrange it.
Safeguarding records	In line with statutory guidance and our Safeguarding Policy, normally until the child reaches 25
Accident and incident records involving children	Until the child reaches 21
Photos and videos used in publicity	Until you withdraw consent or we stop using them; we review them every 3 years
Teaching recordings	12 months, or until no longer needed for teaching or exams
Marketing preferences	While we send marketing; the suppression list indefinitely, so we respect your opt-out
Gift voucher records	Until the voucher expires or is used, plus 6 years for accounting
Data protection complaints and requests	3 years after we close them
Website analytics data (Google Analytics 4)	14 months

Saved payment cards. Your card is stored by Stripe, not by us. If you don't continue after a free taster lesson, you can ask us to remove it at any time.

CCTV. We do not currently operate CCTV at our centres. If we introduce it, we will put up clear signs, use it only for security and safety, keep footage for no longer than 90 days unless it is needed to investigate an incident, and update this policy.

Call recordings. We do not record calls to our office.

Keeping your information safe. We use secure, password-protected systems with access limited to staff who need it, strong, unique passwords and two-step login where our systems offer it, encrypted connections on our website, and contracts with suppliers requiring them to protect your information. All staff and teachers receive safeguarding training at induction and agree to our code of conduct, which includes keeping student information confidential. If a data breach is likely to put you at risk, we will tell you and report it to the ICO where required.

10. Your rights and how to complain

You have the following rights over your personal information, and over your child's information where you act on their behalf:

- **Right to be informed:** to know how we use your information (this policy).
- **Right of access:** to ask for a copy of the information we hold about you.
- **Right to rectification:** to ask us to correct information that is wrong or incomplete.

- **Right to erasure:** to ask us to delete your information in certain situations, for example when we no longer need it.
- **Right to restrict processing:** to ask us to pause using your information in certain situations, for example while we check whether it is accurate.
- **Right to data portability:** to receive information you gave us in a commonly used electronic format, or ask us to send it to another organisation, where we use it on the basis of contract or consent.
- **Right to object:** to object to us using your information on the basis of legitimate interests. **You have an absolute right to object to direct marketing**; if you do, we will stop.
- **Right to withdraw consent:** where we rely on consent (for example for photos, health information, marketing or cookies), you can withdraw it at any time. This does not affect anything we did before you withdrew it.
- **Rights about automated decisions:** we do not make decisions about you using solely automated processing.

How to use your rights. Email dataprotection@themusicworks.uk, call 01483 516060, or write to Kyle MacKenzie, The Music Works, Rodborough School, Rake Lane, Milford, Surrey, GU8 5BZ. It is free. We may need to check your identity. We will reply within one month, or within three months for complex requests (we will tell you if so). If we need more information to deal with your request, the time limit starts once we receive it. Some rights do not apply in every situation; if we cannot do what you ask, we will explain why.

Complaints to us. If you are unhappy with how we have handled your information, please tell us first so we can put it right. You can complain using our data protection requests and complaints page, by email, by phone or in writing using the details above. You do not need to use any particular wording. We will acknowledge your complaint within 5 working days, keep you updated, and respond fully without undue delay, telling you what we have done.

Complaints to the ICO. You also have the right to complain to the UK data protection regulator, the Information Commission (the ICO):

- Website: ico.org.uk/make-a-complaint
- Helpline: 0303 123 1113

The ICO will usually expect you to have raised your concern with us first.

11. Changes to this policy

We review this policy at least once a year and whenever we change how we use personal information. The “Last updated” date at the top shows when it last changed. If we make a significant change, for example using your information for a new purpose you would not expect, we will tell you by email or through your Opus1 account before the change takes effect.