

Cork City Music College Privacy Statement

General Statement

If you are a student of Cork City Music College (CCMC) we will require some personal information to be able to comprehensively and lawfully provide our services to you.

Personal information as used in this Privacy Statement refers to information such as your name, e-mail address, mailing address, or telephone number that can be used to identify you.

CCMC may also be provided by you, information related to special needs you may have; these could include issues such as particular health conditions you may have that it is important for us to be aware of so we can provide our services in a safe way to you and others.

CCMC may also hold some financial information you provide to us to pay for our services. This information would be related to the information you provide to CCMC when you pay either by bank transfer or online.

CCMC may also use your photo for promotional use on our website, social media or in promotional materials (such as a brochure that CCMC mails out to prospective students). CCMC will always seek your consent in using these photos except when a publicly accessible concert is on and a student is performing. However if you object to us using a picture of you at a concert or performance just inform us and we will, normally, immediately remove it. The use of photographs/ videos taken by third parties at any public CCMC events are not under the control of Cork City Music College.

Generally, CCMC will only process your personal information/data as described in this Privacy Statement and in the Website Privacy Policy. However, CCMC may have to conduct additional processing required by law, or in support of any legal or criminal investigation.

Our services will require you to provide us with personal information. In these situations, if you choose to withhold any personal information needed by us, it may not be possible for us to fully perform our contract, the provision of music lessons in exchange for a monetary fee, with you.

CCMC will process your personal information to provide you with services you are contacted with us for, you expressed an interest in, to bill you for services you requested, to market services which CCMC think may be of interest to you, or to communicate with you for other purposes which we assess would be in our interest to do so and we assess is not invasive, unexpected or unwanted by you.

What personal data do we process about you?

For Leaving or Junior Cert students

When you are a student of CCMC, we normally require your name, your parents' or guardians' name, address, email, date of birth, school you attend, class in school, your phone number, your parents' or guardians' phone number, the year in which you will be undertaking the Junior or Leaving Cert and image(s) of you. Additionally, we may require any other information related to your contract between us, for the provision of music lessons in exchange of a monetary fee, that you believe is relevant so we can provide a safe, efficient and appropriate service.

For primary and secondary school students

When you are a student of CCMC, we will normally need your name, date of birth, the school you attend and the class you are in, your parents' or guardians' name, your address, your parents' or guardians' email, and their phone number. Additionally, we may require any other information related to your contract between us, for the provision of music lessons in exchange of a monetary fee, that you believe is relevant so we can provide a safe, efficient and appropriate service.

For students 18 years or older

When you are a student of CCMC, we will normally need your name, date of birth, school (if you are still attending and the class you are in), address, email address, phone number, and an emergency number of a third party. Additionally, we may require any other information related to your contract between us, for the provision of music lessons in exchange of a monetary fee that you believe is relevant so we can provide a safe, efficient and appropriate service.

Other forms of personal information processed by CCMC

CCMC may need further personal information to carry out its tasks in our capacity as a music teaching organisation. CCMC will never sell, rent or otherwise use your data for any other purposes not compatible with its role as a music teaching organisation and its statutory obligations both as a music school and a company with charitable status registered in Ireland.

Age to form a contract and consent

In Ireland a minor (those under the age of 18) cannot, normally, form a legally enforceable contract. Therefore all contracts between CCMC and students under the age of 18 will be formed between the child's parent/guardian, on behalf of the student, and CCMC.

The age of consent on data protection and privacy is largely undefined and CCMC considers that 16 is an appropriate age of consent for issues around use of images on our website, social media and promotional brochures as we believe a typical 16 year old has the capacity to understand what they would be consenting to.

Processing of students' images

CCMC holds regular concerts and performances held in public or by invite only in various venues. Normally these performances will include many members of the public who will record the performance on their mobile devices or other image capturing devices. These performances are a form of artistic expression and, as such, an exemption on the use of the processing of images under data protection law apply.

However, we do occasionally take pictures of students in rehearsal or more restricted venues. In this case we will only use their image with their consent if they are over the age of 16 and with the parents'/guardians' consent if they are under the age of 16. This consent can be withdrawn at any stage and we will immediately remove, or render unidentifiable, those images if we receive such a written instruction.

When you visit our website

The other type of personal information that CCMC collects is non-identifiable personal information or aggregated information when you visit our website. When you visit the CCMC website, the following information may be retained about that visit:

- The IP address of the visitor's web server.
- The top-level domain name used (for example .ie, .com, .org, .net);
- The previous website address from which you reached us, including any search terms used.
- Google analytics which show the traffic of visitors around our web site (for example pages accessed and documents downloaded).
- The type of web browser and operating system used by you.

Who do we share your personal data with?

- Your basic personal details may be shared with appropriate staff in one of the eleven centres we hold our classes in for the purposes of safety and security.
- Our contracted accountant for the purposes of preparing our finances.
- Revenue for purposes of our legal obligations under finance law.

- On our social media your photos will be shared by our followers of our accounts.
- On our website your photo will be viewable by all territories in the world which allow unfettered access to the World Wide Web.
- On our brochures your photo will be shared with those of whom we distribute the brochure to.

How long will CCMC keep your personal information?

CCMC will retain your information, required to form a contract with us, for the provision of music lessons in exchange of a monetary fee, for a period of at least six years from the last time you were a student with CCMC.

CCMC will retain your personal information required for finance and auditing purposes for six years.

CCMC will retain your personal information required for routine communication with you for three years following your last contact with CCMC.

CCMC will retain your photo on its website and social media indefinitely or until such a time you withdraw your consent if it is not at a public artistic performance.

What is our lawful basis for processing your personal information?

- *Necessary for the performance of a contract* (GDPR Article 6.1 b) – much of the personal information CCMC processes on students is carried out so we can perform our contracted services for the provision of musical lessons to you.
- *Necessary for compliance with a legal obligation* (GDPR Article 6.1 c) – CCMC is obliged to process certain personal information, or documents with your personal information contained in them, with Revenue.
- *Necessary for the purposes of our legitimate business interests* (GDPR Article 6.1 f) – from time to time, CCMC may use your personal information to send you emails related to our courses, concerts and offers we think you may be interested in.
- *Necessary to protect the vital interests of (the student)* (GDPR Article 6.1 d) – in the event of an emergency CCMC may use your personal information with third parties (such as medical professionals or other emergency services) to prevent, minimise or manage harm that may come to you or others.
- *You have given consent to the processing of his or her personal data* (GDPR Article 6.1 a) – CCMC will only use your photo on our website or social media account with your consent, if that photo was taken at a non-public artistic performance.
- *For the purposes of artistic expression* (GDPR Article 85.1 & Irish Data Protection Act Section 43.1) – if you perform at a public artistic performance CCMC can process your data, namely your still image and audio visual images without your consent. Where practicable, and removing your image does not affect the rights of other people in the same image, we will cease processing it if you ask us to do so.

Further information and to contact us

This privacy statement will be available on our website (www.ccmc.ie) and can be emailed on request when you register for a class.

If you have any questions regarding our above statement or would like to exercise your rights under Article 15 to 22 of EU GDPR (right to access, erasure, restriction etc.) please contact us at CCMC, at Coláiste Éamann Rís, St Patrick's Road, Cork or by email on info@ccmc.ie.