

Steve Turner (operating as stringarranger.co.uk) GDPR Privacy Policy, May 2018

This policy details the nature of personal data stored by the above-named organisation in relation to clients who have employed my services via my website, social media sites, direct contact or personal recommendation.

My legal justification under Article 6 of the GDPR for collecting this data is Legitimate Interests. Processing of this data is necessary in my capacity as a producer of music, to facilitate the necessary dialogue during the process. I process this data in ways that my clients would reasonably expect, as detailed below, and which I believe to have a minimal privacy impact on them. It is in both my clients' and my own commercial interests to collect and process this data. Data is obtained directly from my clients on request as and when it is needed and is stored on my secure computer and iCloud-based storage to facilitate future communications and dialogue. For this reason, I do not intend to obtain individual written consent to retain personal data already held on my system or to retain newly obtained data from this point onwards.

If at any stage any person for whom I hold personal data records has any questions or concerns regarding my methods or reasons for holding this data, I would encourage them to contact me via my website: stringarranger.co.uk

What personal information do I collect and store? Why is it being collected?

Below is a breakdown of clients' (hitherto referred to as 'you' or 'your') personal data categories collected by stringarranger.co.uk, and my reasons for collecting and storing this information.

- **Contact details**, i.e. mobile phone numbers and email addresses: held for the purpose of contacting you regarding arrangements for commissions.
- **Website URLs and social media usernames**
- **Professional images**

Who is collecting this information?

This information is being collected by Steve Turner (stringarranger.co.uk), a composer and recording artist.

How is this data being collected?

Data is collected directly from you, the person to whom the data relates, via website contact form, email or occasionally via telephone.

How will this data be used?

- I will use your contact details to communicate with you regarding professional commissions.
- I will use your website URLs, social media usernames and professional images on my own website, blog and social media sites for the purpose of mutual artist promotion.

Who will this data be shared with?

For the purposes of this document, the term 'third party' is used to refer to an individual or entity with which stringarranger.co.uk has entered or is in the process of entering into an agreement to provide copying, performing or recording services. Where your personal data is shared with another organisation in connection with the completion of a commission you will always be asked for your consent prior to the release of this information and I will request confirmation from the third party that your details must be treated as strictly confidential, must be deleted immediately upon completion of the contracted engagement, and may not be shared with any further third parties.

stringarranger.co.uk 'third parties' will typically be assistant copyists, producers, string section fixers, string players and recording studios.

- Your contact details (phone numbers and email addresses) may occasionally be shared with third parties in circumstances where you require additional services unavailable directly from stringarranger.co.uk.
- On occasion I may be in a position to introduce you to third parties by way of promoting your work, where I believe such opportunities to be genuine and the third party is known to me.

I may share your contact details with such persons in your own legitimate interests, but always with your prior permission, unless you specifically request otherwise. On occasion I may deem it suitable to put third parties directly in touch with you to facilitate arrangements for recordings.

Should you wish for stringarranger.co.uk to keep your contact details restricted to use by myself and that they not be shared with third parties, please inform me and I will make a note on your contact record.

How is this data stored?

This data is stored across 2 platforms:

- My secure iCloud mail and contacts account
- My secure studio computer system including encrypted back-up hard drives.

How long will this data be stored?

Data will be stored for as long as there is a possibility of future commissions from you, unless you request your data be updated/removed.

I commit to immediately update or delete any incorrect or out-of-date records if you advise me that your data has changed or is inaccurate.

General

I formally recognise the existence of each of data subject's rights, including the right to request the updating or removal of data records at any time, where relevant, and the right to lodge a complaint with a supervisory authority.

- Right to be forgotten: An individual may request that an organization delete all data on that individual without undue delay.

- Right to object: An individual may prohibit certain data uses.
- Right to rectification: Individuals may request that incomplete data be completed or that incorrect data be corrected.
- Right of access: Individuals have the right to know what data about them is being processed and how.
- Right of portability: Individuals may request that personal data held by one organization be transported to another.

I stipulate that in order to fulfil my contractual obligations to you and to perform my function as a string arranger on your behalf, I may require you to share certain personal data types: e.g. contact details. It should be understood by you that upon commissioning of my services, this information may be required by me under the above privacy protection terms, and that if you choose to withhold this data your commission may be unachievable due to my inability to communicate adequately.

Under my current business operating model, it is unlikely that the uses of your data will change materially in future, and I will notify you if any material changes are made. My data storage platforms (i.e. iCloud) may be subject to change, in which case I will of course ensure that any new chosen platform conforms to GDPR and all existing data protection law.