



## **Menuhin Competition Trust – Data Privacy Policy (revised 9<sup>th</sup> May 2018)**

The Menuhin Competition Trust is committed to upholding the Data Protection principles of good practice. Protecting your privacy is important to us and we strive to keep all information relating to you confidential in accordance with this statement and the law. As part of the normal operation of our services you may voluntarily provide us with information about yourself. The purpose of this Privacy Policy is to explain what personal data we collect about you, how that personal data might be used and how we protect your personal data and privacy.

### **1. About this Policy**

1.1 This policy explains when and why we collect personal information, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website [menuhincompetition.org](http://menuhincompetition.org) regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

### **2. Who are we?**

2.1 We are the Menuhin Competition Trust, a UK registered charity. We are registered with the Information Commissioner’s Office as a data controller (ref: Z1111346). We can be contacted via the following methods:  
Address: 7 Exton Street, London SE1 8UE, United Kingdom  
Tel: +4420 7620 8470  
Email: [office@menuhincompetition.org](mailto:office@menuhincompetition.org)

### **3. What information we collect and why**

3.1 The information that we hold for our contacts is some or all of the following: personal name, address, telephone number and email address(es) as well as job title and organization where relevant. This information is held for the purposes of managing the Menuhin Competition’s online database of interested parties.

3.2 We believe that all current contacts have a legitimate interest in the Menuhin Competition and have given their consent for us to contact them at the time we acquired their contact details via one of the following methods:

- Entering their details into our online application portal (either as a potential applicant or as a recommendation for an applicant) and therefore willfully providing their contact details to the Menuhin Competition

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FOR YOUNG VIOLINISTS**

Competition Office, 7 Exton Street, London SE1 8UE, United Kingdom  
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The Menuhin Competition Trust. Registered as a Company Limited by guarantee in England No. 01612181  
Registered Office St. Brides’s House, 10 Salisbury Square, London EC4Y 8EH. Registered Charity No. 284467. Vat No. 444903154



- Having been a participant, or a parent of a participant, of the Menuhin Competition in the past
- Consenting that a Board Member of the Menuhin Competition Trust could give the Competition their contact details in order to keep them up to date and/or invite them to events
- Having attended Menuhin Competition events in the past and asked to be kept up to date
- Having agreed to be a host family, a partner or a member of a circle of friends of a recent Menuhin Competition
- Having made a donation to the Menuhin Competition Trust
- Having entered a Menuhin Competition prize draw via a partner of the Menuhin Competition and having given that partner consent for their details to be passed onto us
- Entering their details into our mailing list database via the newsletter sign-up form
- If information about you is publicly available, and it is in the legitimate interest of the Menuhin Competition Trust to store that data then we may do so. We may combine that publicly available data with the data that we already hold about you.

3.3 We hold this data for the purposes of our legitimate interests in operating the Menuhin Competition, keeping interested parties informed of our activities, in ways that include:

- Communicating with and providing services to our applicants, competitors, audiences, supporters, event attendees and other participants in the Menuhin Competition
- Keeping an archive record of each past event
- Furthering the Trust's charitable mission (which includes fundraising)
- Enabling the Trust to achieve its strategic and operational goals

3.4 The routes via which we might contact you are:

- Email (if you have provided an email address), either directly or via Constant Contact for our newsletter or Paperless Post
- Telephone or post (if you have provided your phone number or postal address)
- Online advertising (if you have provided information or taken actions that permit us to target advertising at you, such as by liking our Facebook page)
- Publishing content on our webpages

3.5 Any contact may amend their contact details or withdraw their consent at any time by following links in any newsletter sent by Constant Contact.

3.6 We seek consent from parents of all applicants and competitors under the age of 13 who we will be corresponding with to grant us permission to do so.

#### **4. How we protect your personal data**

4.1 Your personal data is securely stored on one or more of our selected Data Processors (Constant Contact, Paperless Post and Box), along with the Menuhin Competition Trust's data. We will not transfer your personal data without your consent.

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4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.3 We use reputable software for our communications. Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.4 In cases where we might take any payments or donations from our contacts we will use recognised online secure payment and donation systems.

4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

## **5. Who else has access to the information you provide us?**

5.1 We will never sell your personal data nor share your personal data with any third parties without your prior consent (which you are free to withhold) except:

- Where we are required to by law
- If we have first asked, and been given, your permission to do so
- If we use reputable service providers to deliver one of our methods of communication, such as to send you emails

5.2 If you choose to interact with one of our pages on a social network, such as Facebook or Twitter, that interaction may result in personal data being shared with us by the social network operating under its own legal contract with yourself.

5.3. The website and social networks used by us may place cookies and tracking pixels on the device from which you are accessing them. A cookie is a small text file containing information about how you arrived at a website, the pages you may have visited or information about your device to be used to improve functionality of the website. The emails we send out may also use a tracking pixel to record if the email is opened and links followed.

5.4 In cases where external companies that we use in order to perform our operations are based outside the European Economic Area (EEA), we ensure that they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA. For example, our marketing emails are dispatched by a company in the US. That company has provided documentation to prove that they are compliant with the data protection framework built to cover data sharing between the EU and the US (called EU-US Privacy Shield). An adequacy decision is in place for the EU-US Privacy Shield, so that company is recognized by the European Commission as providing adequate protection for your data.

## **6. How long do we keep your information?**

6.1 We will hold your personal data on our systems until you choose to unsubscribe. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not

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entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defense of legal claims.

6.2 In cases of processing financial information, we will securely destroy all financial information once we have used it and no longer need it.

## 7. Your rights

7.1 You have rights under the GDPR:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

7.2. You can find out what these rights cover and how to exercise them here <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights> Should you wish to receive details of the information that we hold on you then you are free to get in touch with the Data Controller at any time to request this using the contact details below.

7.3 If you are unhappy with the way in which your personal data has been collected, stored or processed you may in the first instance contact the Data Controller using the contact details below. You have the right to take any complaints about how we process your personal data to the Information Commissioner: <https://ico.org.uk/concerns>; 0303 123 1113; Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

For more details, please address any questions, comments and requests regarding our data processing practices and the handling of your personal data to the following:

Data Controller

Menuhin Competition Trust

7 Exton Street

London SE1 8UE

United Kingdom

Email: [office@menuhincompetition.org](mailto:office@menuhincompetition.org)

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