


## The Harmony Project - Privacy Policy and Procedure

<b>Lead</b>	The Harmony Project Leadership Team
<b>Policy prepared by:</b>	Clare Long
<b>Policy approved by the Director:</b>	Richard Dunne
<b>Signed by the Director:</b>	
<b>Became operational:</b>	February 2023
<b>Due for review:</b>	April 2026
<b>Reviewed by and on:</b>	April 2025

The Harmony Project is committed to safeguarding the privacy of your personal data. Please read the following policy to understand how your personal data will be treated as you make full use of our services.

**Harmony in Education is registered with the Information Commissioner's Office (ICO) ref: ZB524257**

### 1. Who Are 'We'?

In this policy, the words 'We', 'Us' or 'Our' refer to The Harmony Project. We are the data controller, data processor or both data controller and data processor of your personal data that We collect from you from time to time.

It's really important to Us that you trust Us with your personal data so We want to make sure that you understand what personal data We hold about you and how We collect, store and process it.

We will use your personal data in the way(s) set out in this policy. If you are not happy with the way that We are using your personal data, please do not provide us with your personal data (We have set out more information on how We collect your personal data below). If you have any questions about this policy, or what We do with your personal data, please contact Us using the contact details below.

You can contact Us about this policy at [info@theharmonyproject.org.uk](mailto:info@theharmonyproject.org.uk) or write to the Information Manager, The Harmony Project, 25 Sidney Road,

Walton-on-Thames, KT12 2NA.

## **2. What is personal data?**

Personal data is information about you that can help Us identify you, such as your name, address, phone number or email address, or more discrete data such as the device ID of any smartphones, tablets or similar mobile devices you own.

## **3. What personal data do We collect about you?**

The nature and the type of personal data we collect will depend on why you are giving it to Us.

We collect personal data about you when you:

- use Our website. We collect information where available including your device's ID, IP address, operating system and browser type. This information helps us produce anonymised data about our users' browser behaviours.

### **Our website also uses cookies:**

A cookie is a piece of information that is stored on your computer's hard drive by your web browser. On revisiting the website, our computer server may recognise the cookie, giving us information about your last visit. Most browsers accept cookies automatically, but usually you can alter the settings of your browser to prevent automatic acceptance. If you choose not to receive cookies, you may still use most of the features of the website.

We use cookies for recognition purposes at login through the use of a persistent cookie placed on your hard drive. We also use standard cookies to track activity around the site. This cookie is deleted at the end of each session/visit. We may also use cookies to track any click through from emails sent by The Harmony Project and/or selected partners.

If you wish to find out further information about cookies, you can obtain additional details from [www.aboutcookies.org](http://www.aboutcookies.org). This site offers a comprehensive guide on cookies and how to remove them from your computer.

- purchase items from Our online shop. We collect information such as your name, contact details, delivery address (if applicable) and your bank/credit card details
- interact with Us on Our social media pages (such as Twitter, Facebook, Pinterest and Instagram). We collect information about you from Twitter and Facebook's sites if the settings on your accounts or the privacy

policies of those sites give Us permission to do so. This would include your name, and any direct or private messages sent to Us)

- sign up for Our newsletter. We collect information such as your name and email address and may audit your 'click throughs' on the newsletter emails that we send to you
- participate in competitions or events hosted by Us or if you make a donation to us. We collect information such as your name, contact details, delivery address (if applicable) and your bank/credit card details or
- voluntarily provide Us with your personal data whilst completing surveys, signing up for events, or providing feedback. We collect information such as your name, email address, postal address and any additional comments or information you give to Us

If any of your personal data changes, or you believe that any of the personal data that We hold is incorrect, please let Us know by contacting Us at [info@theharmonyproject.org.uk](mailto:info@theharmonyproject.org.uk) and We will ensure that the Personal Data is up to date. We may also contact You from time to time to verify that Your Personal Data is up to date.

#### **Special Category data:**

We will only ever collect special categories of data where we have explicit consent to do so, where it is in your vital interests that we do so, or to enable us to make decisions regarding the services that we provide to you.

#### **4. What do We use your personal data for?**

When processing your personal data, We will only do so in relation to specific purposes and only after giving careful consideration to ensure that your privacy rights are not seriously impacted.

We will process the personal data that you provide to us in the following ways for the purpose of (and on the basis of) our performance of our contractual obligations to you:

- To provide you with the services that you have requested or purchased from Us, such as fulfilling your purchase of a ticket through Our website (this may include correcting any errors that you have provided such as any typos in your postal address);
- To administer Our events that you wish to attend, such our webinars.

- In order to verify your identity (i.e. to confirm that you are who you say you are)
- We will process the personal data that you provide to us in the following ways based on our "legitimate interests" as a business:
- Where We do research on demographics, interests and behaviour based on the information you provide to Us. We do this to better understand you. This research is compiled and analysed on an anonymised basis. We may share this anonymised data with partner organisations;
- In order to improve the services We provide to You and your experience when you come to visit Us (by knowing a little bit about you We are able to deliver a better service to you);
- To create a profile about you to ensure Our communications to You are relevant and timely, and to provide you with an improved experience when using Our services
- To provide your personal data to Our insurers from time to time.

If you do not wish your information to be screened or if you wish to view or edit any profile that we have created about you, please let Us know, either by email to [info@theharmonyproject.org.uk](mailto:info@theharmonyproject.org.uk), by post to the Information Manager, The Harmony Project, 25 Sidney Road, Walton-on-Thames, Surrey KT12 2NA, or by telephoning 07976 371 489.

- We will only retain such profiles for as long as it is appropriate to do so and will always delete this data responsibly in line with Our Data Retention Policy.
- To respond to any queries that you ask Us;
- Helping Us identify and fix defects or errors in Our sites, system or services; or
- To carry out research in relation to your participation in any of Our programmes or events that you have attended in order to measure customer satisfaction, evaluate the success of Our programmes or to troubleshoot any issues.
- We will process the personal data that you provide to us in the following ways in order to comply with Our legal obligations:

- To retain and process records when you make a donation to Us for Gift Aid transactions;
- To ensure that Our sites are kept secure and to prevent crime;
- For the purposes of identifying and preventing fraud; and
- To comply with statutory or regulatory requirements, such as reporting requirements Health and Safety Law.
- Marketing Communications.
- We will also process your personal data where you have given your consent to us doing so, for example:
- When you have asked to receive Our newsletter
- When you have asked to receive other forms of marketing communication about Us,
- When you have asked to receive information about Our upcoming events.

Where We are relying on consent to process your personal data, We will only process your personal data for the purpose that you have given Us consent for. If you would like to receive these communications but have not opted in please contact Us on 07976 371 489 or email [info@theharmonyproject.org.uk](mailto:info@theharmonyproject.org.uk) indicating your preferred channel to receive marketing communications from Us.

We may occasionally contact you where you have purchased tickets or a product from Us in the past and We want to tell you about a similar event or product; where We do so We will provide you with an opportunity to "opt-out" of such communications.

If you do not wish to receive marketing or fundraising communications from us or other charities, We also suggest that you also please ensure that you register with the [Fundraising Preference Service](#).

## **5. Who do We share your personal data with?**

We may provide your personal data to third parties who may process your data as part of the services they carry out on Our behalf. In order to provide you with the services that you have requested from Us, the following third parties may also need to process your personal data:

A. third party product and service providers who We engage on your behalf to provide the products or the services that you have agreed to purchase (such as the purchase of tickets or delivery of goods purchased on Our website. This may include, for example, courier companies (such as DPD) and Royal Mail.

B. any statutory, governmental or regulatory body that requests the personal data and that We are obliged (by law or by regulation) to provide;

C. our analytics and search engine providers that assist Us in the improvement and optimisation of Our website. We currently use Google Analytics. [Read its privacy policy online](#);

D. competition partners who team up with Us to host competitions who We share personal data with as part of Our partnership;

Please be aware that advertisers or web sites that have links on Our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those web sites.

As Our requirements change, We may need to change the third parties that process your personal data to meet those requirements.

We do not sell or rent your personal data to anyone, We will never provide your personal data to another company or charity for their marketing purposes without your explicit consent.

Our website uses Google Analytics 4, a web analysis service by Google as detailed in point C above. In addition, our website uses Google remarketing and Google Signals, which are also services by Google. Google Analytics uses cookies and similar technologies to analyse and improve our website based on your usage behaviour. Google remarketing also use cookies and similar technologies in order to measure the performance of advertisements placed (so-called AdWords campaigns) and to show you individualised advertising messages on websites that collaborate with Google. Google Signals compiles for us multi-platform data reports on Google users that have enabled personalised advertising in their Google accounts.

If you have enabled personalised advertising in your Google account, Google will be able to prepare data models and reports on website habits, which show for instance on which device you first clicked on an advertisement and on which device any eventual purchase took place. This Google information focuses on Cross Device Reports and may include end user location, search history, YouTube history, and data from sites that partner with Google and is used to provide aggregated and anonymous insights into the users' cross-device behaviours. We are unable to draw any conclusions as to the identities

of the individual Google users because we do not collect identifiable data; your data is anonymised.

Such data may be accessed and/or deleted by users via Google My Activity. In addition, users can opt-out of the Google Analytics Advertising Features through their Google Ads Settings, Ad Settings for mobile apps and the [NAI's consumer opt-out](#). For more information, see Google Privacy Controls in your Google browser. You can also use Google Analytics [opt-out browser add-on](#) if you do not wish for your data to be used by Google Analytics.

## **6. How do We protect your personal data?**

We will always do Our best to keep your personal data secure. Steps We take in order to do this include the use of technical controls (such as encryption and network protection), limiting the number of people working for Us who have access to your data and ensuring that they are trained in protecting your personal data.

Where We use external suppliers to process your personal data, We put contracts in place to make sure that they treat it as carefully as We would and use it only in accordance with the instructions that We give to them. Where these suppliers operate outside of the European Economic Area (EEA), We will make sure that the levels of protection provided are at least equal to those required by UK law.

## **7. Retention of your personal data**

We will only retain your personal data for as long as We need to keep it. In considering how long to retain your data we will always take into account factors such as any ongoing obligations We have to You, the nature of Our relationship with You, legal requirements (e.g. in relation to HMRC statutory retention periods) and contractual requirements. We will not keep Your data indefinitely and will always dispose of it carefully when it is no longer necessary for Us to retain it, in line with defined schedules in Our Data Retention Policy.

## **8. Your Rights – What are the choices available to you regarding collection, use and distribution of your personal data?**



The law gives you a number of rights in relation to your personal data and Our use of it. You have the right:

- A. to ask Us not to use your personal data for direct marketing purposes;
- B. to ask to see what personal data We hold about You and to find out about the way that We process the data (and in some circumstances, You can ask Us to provide a copy to a third party);
- C. to ask Us to correct or update any personal data which is inaccurate;
- D. to ask for personal data to be deleted in some (but not all) circumstances where there is no good reason for Us to continue to process it;
- E. to ask Us to temporarily stop using your data if You don't believe that We have a right to use it, or to stop Us from using your personal data where there is no good reason for Us to continue to use it; and
- F. not to be subject to decisions made solely on the basis of 'automated processing' (i.e. the right not to be subject to decisions made solely by algorithms or computers without input from a human) in certain circumstances.

If You would like to exercise any of the rights listed above, or if You have any queries or concerns about the way We use Your personal data (or any questions about this privacy policy), You can contact us by email at [info@theharmonyproject.org.uk](mailto:info@theharmonyproject.org.uk), by post to the Information Manager at The Harmony Project, 25 Sidney Road, Walton-on-Thames, Surrey KT12 2NA or by telephone at 07976 371 489.

### **Your Right to Lodge a Complaint**

If you are unhappy with the way We have dealt with your personal data or if you have any further questions about how We process and retain personal data please contact Us in the first instance at [info@theharmonyproject.org.uk](mailto:info@theharmonyproject.org.uk) or by writing to the Information Manager, 25 Sidney Road, Walton-on-Thames, Surrey KT12 2NA, so that We can try to put this right.

If you are still not satisfied, you have the right to lodge a complaint with the Information Commissioner's Office. [Further information on how to do this is available on the ICO website](#)



## **9. Changing this policy**

We may make changes to this policy from time to time. If We make any significant changes to this policy that impacts the way in which your personal data is treated, We will post the changes on this page or, where We feel that the changes are really significant, We may contact you directly. Changes will apply from the time We post them (either here on Our website or when We contact you). This policy was last changed on 21<sup>st</sup> February 2023.

## **10. How can you access, update or delete your personal data?**

In addition to the click options throughout this policy, You may change or update any or all of the personal data that We hold about you by contacting The Harmony Project's Information Manager at [info@theharmonyproject.org.uk](mailto:info@theharmonyproject.org.uk)

### **Useful contact information:**

Richard Dunne  
Director  
07872 959 334  
[richard@theharmonyproject.org.uk](mailto:richard@theharmonyproject.org.uk)

Clare Long  
Events & Project Coordinator  
07976 371 489  
[clare@theharmonyproject.org.uk](mailto:clare@theharmonyproject.org.uk)