

# PRIVACY POLICY 'CONNECTING MUSIC' 2023-24 V2.0



This Privacy Policy forms the basis for visiting us and our website. Please read them carefully as they contain important information.

For queries concerning your rights as a customer, please consult our Terms & Conditions Policy.

## General Privacy Policy

Connecting Music Distribution is committed to respecting your privacy and protecting any and all information you provide. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information. This Privacy Policy applies only to your use of the Connecting Music Distribution Website. Partner organisations on the Website may also gather information and you should consult those other parties' privacy policies as appropriate and applicable.

Connecting Music Distribution is fully committed to complying with the Data Protection Act 1998 and the EU General Data Protection Regulation. These are referred to in this Privacy Policy as the "Data Protection Laws". The Data Protection Laws give you various rights regarding the way in which we store and use your information. These are set out below in the sections "Your rights under the Data Protection Laws".

In this Privacy Policy, references to "Connecting Music Distribution", "we" or "us" are to Connecting Music Distribution, 95, Gilmore Place, EH3 9NU, United Kingdom, who will be the controller of any personal data processed as described in this Privacy Policy. For the purpose of the Data Protection Laws, Connecting Music Distribution is the data controller.

Please contact Connecting Music Distribution Data Protection Officer to make a request under the Data Protection Act or EU data protection regulation or if you have any questions about your personal information.

Data Protection Officer

**Connecting Music Distribution**

95, Gilmore Place, Edinburgh, EH3 9NU, United Kingdom

Tel: +44(0) 131 221 9753.

Email: [info@connectingmusic.co.uk](mailto:info@connectingmusic.co.uk)

If, following the Data Protection Officer's reply you feel that your requests have not been fulfilled, you may contact the Information Commissioner. Details of how to take your complaint further can be found on the Information Commissioner's website.

In this Privacy Policy, when we use the following terms they will have the following meanings:

- "Personal Data" information from which the identity of a living individual may be determined. Examples of Personal Data include (but are not limited to) first and last name, home or other physical address, email address, phone number, work history and other contact information.

- “Visitor”: an individual visiting our Website.
- “Website”: means the [www.connectingmusic.co.uk](http://www.connectingmusic.co.uk) Website.
- “you”, “your”: anyone who interacts with our Website, including, customers and visitors.

## General

Connecting Music Distribution is fully committed to respecting your privacy and protecting any information you provide. We only use the information you provide to process orders you may place on the Connecting Music Distribution website, notify you when important changes are made to our service, and occasionally tell you about relevant products or services we are offering in line with our direct marketing rules. We will not pass your details to third parties for marketing or research purposes.

Our terms can be accessed at the bottom of our main page at all times, and a link to these details will be emailed to you upon request when you have placed an order. Anyone is permitted to save a copy of these terms to their computer or device for reading at a later date. You have the right to access your personal data and the right to correct, block and delete it at any time.

### **1. What Information We Collect from You**

Our primary goal in collecting personal information from you is to provide you with a smooth, efficient, and personalised experience while using our website. This allows us to provide services and features to meet and exceed your needs and to customise our service to make your experience easier and quicker.

To fully use our website and make purchases, you will need to register as a customer, where you will be required to provide us with your contact information and some other information required to process any orders you place with us. We automatically track certain information about you based upon your behaviour on our site. We use this information to do internal research on the interests and behaviour of our users to better understand and serve them.

We use a web analytics tool to analyse site usage, how our users arrive at our site, what they do on the site, what browser they are using and on what operating system etc. However, this analytics data, collected via a JavaScript tag in the pages of our site, is not tied to personally identifiable information.

When you access our Websites via any means or make a purchase through the Website or by email, we may collect, store and use certain of your personal information in line with this policy. To register or make a purchase on the Websites or by email, we ask for your:

- name

- email address
- postal address
- phone contact details

When you make a purchase, our payment service providers will also collect and process your credit card or other payment details. If you contact us, we may also keep a record of that correspondence.

We may also collect data relating to your visits to the Websites that cannot identify you but records your use of our Websites including, for example, details of how long you have used the Website and Content for.

## **2. Where, How and for How Long we store your Personal Data**

The information that we collect from you (including any Personal Data) may be transferred to, and stored on, various destinations. This will not include destinations outside the European Economic Area (EEA). By providing us with your information (including Personal Data), you agree to this transfer, storing and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. Unfortunately, the transmission of information via the internet is not always completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your information before transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

We only use the information you provide to process orders you may place at a Connecting Music Distribution website. We will keep this information as long as it is necessary under your warranty agreement, under EU and national consumer rights regulations or until relevant storage requirements from financial and tax authorities expire. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

If you gave us your consent to inform you about our product launches or promotional events, we will store your details until you ask us to opt out from our direct marketing or until you exercise your right to withdraw your consent to our processing of your Personal Data in any other form.

## **3. How we Use the Information that we Collect from You**

We use the information collected from you to process your order. Submitting an order will share your personal details with the sales, customer service and

warehouse fulfilment teams at Connecting Music Distribution. We must also share your data with the relevant third-party courier companies to deliver the order to your chosen delivery address.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only:

- where we have your consent to do so,
- where we need the personal information to perform a contract with you, or
- where the processing is in our legitimate interests and not overridden by your rights.

In some cases, we may also have a legal obligation to collect personal information from you. If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

Our promotional end-user newsletters by email (direct marketing)

When you sign up for the Connecting Music Distribution Newsletter you have the opportunity to sign up for event news and product launch information by email. By ticking the relevant topic boxes, you give us your consent to send to your registered email address our regular newsletter. You can always opt-out later, either by clicking on the "unsubscribe" link on the bottom of our emails, or contacting our head office. Please note, the opt-out excludes essential service messages such as order confirmation, dispatch, repair and return emails.

To Whom and why we might disclose your information

Connecting Music Distribution will never sell your data to any third party. But we may disclose your personal information to third parties when permitted by law including:

(a) with your consent;

(b) to our suppliers in order for them to help us provide our services to you, this includes:

- couriers and other logistic partners that provide the delivery of goods to you;
- our provider of customer relationship management services (which allows

us, for example, to send personalised email communications to you);

- our provider of file storage and management services if you email us directly;
- our payment services provider when you make a purchase to process your payment;

These partners' use of your personal data may be subject to their own privacy policies, which are available on their websites, and which we suggest you familiarise yourself with in the relevant circumstances set out above.

(c) if we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our Terms and other agreements; or to protect our rights, property, or safety, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### **4. Updating your information**

You can edit any of the information in your Account. It is your responsibility:

- To protect against unauthorised access to your Account.
- To log-off from your Account when not using it.
- To keep your log-in details secret.

#### **5. Your Rights under the Data Protection Laws**

You have certain rights under the Data Protection Laws, including:

1. The right at any time to withdraw your consent to our processing of your Personal Data.
2. The right to be told what Personal Data we hold about you on our database and how we process that data.
3. The right to request that we provide you with a copy (in a commonly used electronic format) of all the Personal Data that we hold about you. Unless you make repeated requests, we will not charge a fee for providing you with a copy of this data.
4. The right to request that we correct any inaccurate or incomplete Personal Data that we hold about you.
5. The right to request that we irretrievably delete all Personal Data that we hold about you (the so-called "right to be forgotten"). Note that there are limited circumstances in which we are legally entitled to refuse to comply with this request.
6. The right to request that we transmit all the Personal Data that we hold about you (in a structured, commonly used and machine-readable form) to another organisation's IT environment. Note that we are only legally obliged to comply with this request if it is technically feasible for us to do so.

Should you wish to exercise any of the above rights, please contact our Data Protection Officer.

If you exercise any of the above rights, then we will action your request as soon as reasonably practicable and, in any event, within one month.

## **6. Links to other Websites**

Our Website may contain links to enable you to visit other websites which may be of interest including those of our authorised retailers and official brand websites. However, once you have used these links to leave our Website, we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites. You should exercise caution and look at the privacy statement applicable to the website in question.

## **7. Your Consent**

By agreeing to the terms of our Privacy Policy, you consent to the collection, storage, processing and sharing of your Personal Data and other information on the basis set out above.

### Cookies

We use a number of different cookies on our site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit [AboutCookies.org](http://AboutCookies.org) for detailed guidance.

The following describes the cookies we use on this site and what we use them for. Currently we operate an 'implied consent' policy which means that we assume you are happy with this usage. If you are not happy, then you should either not use this site, or you should delete [www.connectingmusic.co.uk](http://www.connectingmusic.co.uk) cookies having visited the site, or you should browse the site using your browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc...).

We use many cookies to enhance the shopping experience for the user, these include:

### Advertising Cookies

We advertise Connecting Music Distribution on a number of third party websites and ad networks, and use cookies to track which sites you clicked on via services such as Google Double Click.

### AdWords Remarketing

We use a Remarketing Cookie to serve more relevant ads to users based on their behaviour during past visits to our website. Google's AdWords Remarketing connects the activity of [www.connectingmusic.co.uk](http://www.connectingmusic.co.uk) with the Adwords advertising network and the Doubleclick Cookie.

### Affiliate Cookies

Allows us to track how you found Connecting Music Distribution through external websites, and in some cases reward those websites.

### Google Analytics

Provides us with information about how users use the site enabling us to improve and refine customers' experience of Connecting Music Distribution. User data is all anonymous. You can find out more about Google's position on privacy as regards its analytics service [here](#).

### Session Cookies

We use a session cookie to remember your log-in for you and what you've put in the shopping basket. These we deem strictly necessary to the working of the website. If these are disabled then various functionality on the site will be broken - including the ability to place orders.

### 3rd Party Cookies

Some cookies used on our site are provided by third-parties, for example pages that contain embedded content, such as YouTube videos, may send you cookies. These cookies are out of our control and you should check these third-party sites for further information.

### Social Media

If you use social networks, such as Facebook and Twitter, to share information from the Connecting Music Distribution website, you may be sent cookies from these websites. These cookies are out of our control and you should check these third-party sites for further information.

### Your Consent

By agreeing to the terms of this Privacy Policy, you consent to the cookies referenced above being set on your Device.

### Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy anytime, so please review our terms frequently.

### Data Protection Service

You can obtain further information about data protection and privacy laws by visiting the [Information Commissioner's Website](#).



## Data Requests by Police or Tax Authorities

If you are working for the police or another public authority and need information from us for the prevention or detection of crime, the apprehension or prosecution of offenders, or the assessment or collection of tax or duty; please contact our Data Protection Officer directly under [info@connectingmusic.co.uk](mailto:info@connectingmusic.co.uk).

Please state the name, public authority and contact details of the relevant officer making the request. For a quicker identity check, the police officer badge number is also helpful. Please explain the information which is sought and why in as much detail as possible. If we should not inform the relevant data subject about your request, please advise accordingly and give the reason. We will deal with your request as quickly as possible.