

Company information

We are Focus on Sound Ltd, a music education software company registered in England and Wales (company number 07636545). We are a MusicFirst company (the Digital Education Division of Wise Music Group Limited (company number 00884449)). Our registered office is 14-15 Berners Street, London W1T 3LJ. We hold a Data Protection Registration with the UK Information Commissioner's Office which is ZA804802.

General information

We have a moral and legal responsibility to respect your privacy and take care of any personal data we hold about you, in compliance with the General Data Protection Regulation (the GDPR) and the Data Protection Act 2018.

We are the data 'controller' for the personal data we process for our legitimate business use (see our separate Privacy Notice covering this), however, we act as a data **processor** when we handle personal data **on behalf of our customers**, i.e. schools who purchase our music education software.

This privacy notice tells you what to expect when we handle personal data as a **data processor** (please note we act as a data controller for the data captured during 'account registration', which is referred to within this privacy notice for completeness).

We **do not sell our services directly to children under the age of 13**. Students under 13 who want to use our learning resources, will need their parent/guardian or their school to subscribe to our services.

When we process personal data on behalf of our customers, we do so only upon their written instructions and have a Data Processor Agreement in place with them, which sets out each of our responsibilities for handling personal data in line with the data protection laws. Any collection, access or use of customer information, is limited to the purpose of us providing the service to our customers.

How we get your information

The personal data we process about our customers and their students, is provided to us directly by the customer when they sign up to our service.

Personal data collected and how it is handled

Account registration

We collect the following information about our customers when they sign up to our services:

- The name and work email address of the employee registering their school (e.g. the system administrator or head of music)
- Name and address of the school, finance officer's name and email (if supplied)

We need this information so we can fulfil our contract with the customer, or take steps at the request of the customer, prior to entering into a contract with them. We also collect this information for our legitimate business interests, for example, by maintaining records for our invoicing, accounting, legal and insurance purposes.

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Using our software

Microsoft Teams or Google Classroom Platforms

Our customers subscribing to Focus on Sound Pro can use Microsoft Teams or Google Classroom integration, to manage their account and access our learning resources.

The following data is captured **within the school's** Microsoft Teams or Google Classroom platform, so the customer can register and manage user accounts, assign work to students and review their test results:

Customers (e.g. a system administrator and/or teacher)

- School name
- School ID (alphanumeric code)
- User IDs (alphanumeric code)
- First names
- Last Names
- School domain
- Class names taught by teachers accessing Focus on Sound
- Class IDs (alphanumeric code)
- Assignments/homework for Focus on Sound

Students

- School ID (alphanumeric code)
- User IDs (alphanumeric code)
- First names
- Last Names
- School domain
- Class names
- Class IDs (alphanumeric code)
- Assignments/homework for Focus on Sound
- Test results

Who has access to this data?

Our customers' system administrators and teachers set up the classes and add students to those classes. They also decide which classes should have access to our software. Access privileges and password management are controlled by the school system administrators. Teachers can also add their own content, tests and lessons, which are saved on the Focus on Sound servers. Focus on Sound has no control over any of these processes listed in this paragraph. **We are not able to view any of the data.**

Music First Application Cloud

Where customers sign up to the standard Focus on Sound subscription, they register and use a system called Music First Application Cloud (MFAC UK), to register and manage user accounts and access our learning resources. The personal data captured within this system are limited to:

Customers (e.g. a system administrator and/or teacher)

- School name
- Employee name and email address
- Username

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- Class name(s) (where relevant)
- A password: an initial password is set by Focus on Sound for the system administrator or main music teacher. This is usually then changed by the user to something secret. The password is encrypted on the system.

Students

- School name
- First and last name
- Usernames
- Class name
- Password – set by the school and stored and encrypted on Focus on Sound's servers. The password can be changed by the student.
- Work assignments from their teacher
- Test data (test title, test date, number of attempts, test result)

Who has access to this data?

Our customers' system administrators can access their school's data held within MFAC UK, so they can set up and manage user accounts. Teachers have access to the data of the students they teach, so they can assign work to those students and view their test results. Students can access their own information recorded on the system, to view their assignments and test results. The access privileges for the system administrator or teacher/admin is set by Focus on Sound in MFAC UK. All other access privileges, content and password management are managed by the customer, within MFAC UK.

A very small number of employees from Focus on Sound and MusicFirst, have access to the customers' data recorded in the MFAC UK, so they can manage the service subscription and provide administration support to those customers. Administration support can include processing of data sent by the customer via secure OneDrive data upload (where specifically requested by the customer). In these circumstances the data is then uploaded by us to MFAC UK. In rare circumstances, we can also add, amend or delete data at the request of the customer.

Where we store data

Focus on Sound only stores personal data on encrypted servers within the United Kingdom.

The personal data stored in MFAC UK, is held within an encrypted database on Amazon Web Services (AWS) encrypted servers in London, United Kingdom.

Focus on Sound also uses the following additional secure servers:

- **Application Web Servers.** These store the Focus on Sound application code and are located in the UK. No customer personal data is stored on these servers.
- **CloudFront servers.** Most media is now stored on multiple servers around the world in a CDN (Content Delivery Network). This is to enable rapid delivery of the media from as near to the customer as possible. No customer personal data is stored on these servers.

Deletion of data

Deletion by the customer

Our customers' system administrators can delete or amend data and users within their Google Classroom or Microsoft Teams platform and within MFAC UK, at any time during their subscription. They can also ask us to carry out these tasks on their behalf, should they require technical support. Students can request their details are updated, amended or deleted, by contacting their school.

Deletion by us

On expiry of the subscription we will retain archived data on our system for up to 2 years in case the school wishes to renew the subscription. We may need to retain certain additional information about the service provision to satisfy our contractual, legal, accounting, or reporting obligations, however this will not contain student data and is usually archived and kept for 5 years after termination of the service contract.

How we protect your information

We take our security responsibilities very seriously and have put in place robust measures to protect our customers' personal data from accidental or unlawful access, disclosure, loss, damage or destruction. The following are examples of how we achieve this:

- We have appointed an independent Data Protection Officer to oversee our data protection compliance
- Customer data is held on encrypted servers in the UK
- We use Microsoft secure OneDrive upload, a secure file sharing platform to receive customer personal data (in cases where the customer prefers not to upload the data themselves to MFAC UK). This platform has 'end-to-end' encryption in place.
- Access to our data and systems is on a strict need to know basis and we ensure our employees, contractors and sub-processors are under an obligation of confidentiality
- Employees receive mandatory annual data protection training and sign up to our Data Protection Policy
- We have robust procedures in place to manage and report personal data security breaches, in the unlikely event of a breach occurring
- Where we use companies who process personal data on our behalf, to help us provide our services to our customers, we will carry out due diligence checks on these companies and have written contracts in place which require them to handle personal data in line with the data protection laws
- We use up to date virus and malware protection software, security patches are applied promptly and we back up data regularly

Our data processors

We use the following companies to help us provide a service to our customers:

- Amazon Web Services (cloud storage)
- Music First UK Ltd (MFAC UK database)
- SetSeed (programming)

Your data protection rights

You have the following rights under the data protection laws:

- The right to be told how your personal data is being processed
- The right of access to your personal data
- The right to rectify personal data held about you which you think is inaccurate or incomplete
- The right to erase your personal data in certain circumstances
- The right to restrict the processing of your information in certain circumstances
- The right to object to your information being used for public interest or direct marketing purposes
- The right to ask that your personal data is transferred from one organisation to another or given to you, in certain circumstances.
- The right to complain to the organisation processing your personal data if you are not happy with the way it has been handled, and to escalate this to the Information Commissioner if you remain dissatisfied

You are not required to pay a fee for exercising your rights and can expect to receive a response within one calendar month. **To exercise these rights, you will need to contact your school (our customer).**

Further information about your data protection rights, can be found on the Information Commissioner's Office website at www.ico.org.

Contact us

If you have any queries about this privacy notice or our data protection compliance, please contact our independent Data Protection Officer, Amber Badley (Firebird Data Protection Consultancy Limited) at DPO@firebirdltd.co.uk.

Alternatively, you can contact us directly at info@focusonsound.com or write to us at 14-15 Berners Street, London W1T 3LJ.

Changes to this privacy notice

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated on the 15/12/2020.