



ACADEMY OF ANCIENT MUSIC

Music Director Laurence Cummings

Founder Christopher Hogwood CBE

UK GDPR POLICY & DATA PROMISE

This policy has been drafted by John McMunn, Chief Executive, who has responsibility for all data protection compliance for Academy of Ancient Music (AAM), a period-instrument orchestra whose charitable objectives are to advance the education of the public in the art of baroque and early classical music and the allied arts.

This policy will be shared with all staff and key officers of the charity, so that everyone at AAM understands their role in delivering our commitment to handling data in a sensitive and legally compliant manner.

Data areas

The Academy of Ancient Music holds personal data for eight groups of individuals and companies. Those groups, the nature of data held and processed, the processing conditions we will use for each processing area, and our storage and security arrangements are as follows:

Musicians

Who they are: The freelance musicians we employ, some of whom may only work for us infrequently (ie once every 5-10 years).

Data held includes: Contact details, passport information, bank details, tax information, AAM fee history and miscellaneous other personal information.

Types of processing & processing conditions used:

Type of processing	Processing conditions used
Engaging artists to perform with the Academy of Ancient Music	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Dissemination of fee, contractual and logistical information	
Dissemination of music	
Processing of payments	
Production of backstage lists	Processing is necessary to comply with a legal obligation
Touring requirements (arranging travel and accommodation on tour)	
Sharing news about the charity, including but not limited to news related to contracts for which musicians were engaged	Processing is necessary for the purposes of legitimate interests, except where such interests are overridden by the interests, rights or freedoms of the data subject
Production of performer lists in programmes and CD booklets etc	
Performer photography in programmes, on website and promotional publications	

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Registered in England as a limited company No.4109942. Registered charity No.1085485. VAT No.759 9050 86

Storage and security: Data are held primarily in Microsoft Office 365, OPAS, Infoodle and Xero. Access is limited to AAM staff and key officers of the charity. All systems are password protected with dual authentication where possible.

Data retention/deletion: We currently hold 2,533 data entries related to musicians, of these a significant number have been deemed not to be in current use. It has been determined however that it would not be in the interest of inactive data subjects for their data to be deleted, as this information contains individual artists' AAM performing history which is occasionally required by immigration authorities in connection with visa applications etc.

Promoters

Who are they: Venues, festivals, artist agents and concert promoters worldwide who have employed or potentially might employ the Academy of Ancient Music, as well as venues we hire that provide services such as box office, backstage or technical support, etc.

Data held includes: Contact details for staff, financial information, building security arrangements, programming interests, background info on key staff (interests, family etc).

Types of processing & processing conditions used:

Type of processing	Processing conditions used
Promoting forthcoming AAM tours and securing engagements	Processing is necessary for the purposes of legitimate interests, except where such interests are overridden by the interests, rights or freedoms of the data subject
Negotiations of fees, contracts and logistics	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Publicity and marketing arrangements	
Fee payments	

Storage and security: Data are held primarily in Microsoft Office 365, OPAS, Infoodle and Xero. Access is limited to AAM staff and key officers of the charity. All systems are password protected with dual authentication where possible.

Data retention/deletion: Contractual and financial data will be retained for 7 years, in accordance with accounting requirements. Contact data will be retained in perpetuity, provided that neither the promoter nor AAM change business focus, to secure further contracts. Data held will be reviewed regularly to ensure that the processing conditions remain current and supportable.

Audiences (marketing)

Who are they: Individuals who have attended or might attend concerts, bought CDs or requested information about AAM.

Data held includes: Contact information, details of concerts attended, background info (interests, family etc).

Types of processing & processing conditions used:

Type of processing	Processing conditions used
Advance marketing of concerts	Processing is necessary for the purposes of legitimate interests, except where such interests are overridden by the interests, rights or freedoms of the data subject
Direct mail	
Publicity / newsletters	
Fundraising campaigns	
Dissemination of tickets and CDs purchased	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

Storage and security: Data are held primarily in Mailchimp, Infoodle, Microsoft Office 365, PayPal and Xero. Access is limited to AAM staff and key officers of the charity. All systems are password protected with dual authentication where possible.

Data retention/deletion: Data will be retained provided that the data subject does not request data to be deleted. Data held will be reviewed regularly to ensure that the processing conditions remain current and supportable.

Donors, potential donors and board members

Who are they: Individuals who have given financial support, or expressed interest in supporting, any of AAM's ventures.

Data held includes: Contact information, details of concerts/events attended, background info (interests, family, connections to AAM etc), past donations.

Types of processing & processing conditions used:

Type of processing	Processing conditions used
Direct marketing regarding past, current and future fundraising campaigns; fundraising requests	Processing is necessary for the purposes of legitimate interests, except where such interests are overridden by the interests, rights or freedoms of the data subject
Publicity and news updates about the charity's activities	
Research and due diligence including wealth screening using trusted third-party research organisations (see also 'Analysis and research of our supporters and potential supporters' below)	
Provision of member benefits, renewals	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Arrangements regarding acknowledgements of donations	
Processing payments of pledged donations	
Gift Aid processing/paperwork	Processing is necessary to comply with a legal obligation

Storage and security: Data are held primarily in Mailchimp, Infoodle, Microsoft Office 365, PayPal and Xero. Access is limited to AAM staff and key officers of the charity. All systems are password protected with dual authentication where possible. Data are occasionally shared with members of the Board of Trustees, Development Board and associated working groups using SharePoint (Microsoft Office 365). This allows us to limit usage to specific individuals, and to revoke access should it be required. Members of the Board of Trustees, Development Board and other associated working groups are forbidden

from viewing any data outside of SharePoint (eg by printing or downloading etc).

Data retention/deletion: Data will be retained provided that the data subject does not request data to be deleted. Data held will be reviewed regularly to ensure that the processing conditions remain current and supportable.

Service providers

Who are they: Businesses whose services we have used or might use, eg office/IT service providers, product distribution/fulfilment, instrument suppliers, caterers etc.

Data held includes: Contact information, details of recommendations made, past work/collaborations, staff information, financial information.

Types of processing & processing conditions used:

Type of processing	Processing conditions used
Researching service providers	Processing is necessary for the purposes of legitimate interests, except where such interests are overridden by the interests, rights or freedoms of the data subject
Engaging service providers	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Payments to service providers	

Storage and security: Data are held in primarily Microsoft Office 365, OPAS Xero and on staff computer hard-drives and work phones. Access is limited to AAM staff and key officers of the charity. All systems are password protected with dual authentication where possible.

Data retention/deletion: Contractual and financial data will be retained for 7 years, in accordance with accounting requirements. Contact data will be retained in perpetuity, provided that neither the promoter nor AAM change business focus, to secure further contracts. Data held will be reviewed regularly to ensure that the processing conditions remain current and supportable.

Staff

Who are they: Current and former staff, applicants for jobs, freelance staff.

Data held includes: Contact information, details of recommendations made, financial information, employment details (including any grievance procedures etc).

Types of processing & processing conditions used:

Type of processing	Processing conditions used
Recruiting staff	Processing is necessary for the purposes of legitimate interests, except where such interests are overridden by the interests, rights or freedoms of the data subject
Day-to-day operations of the charity	

HR processes	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Salary payments	

Storage and security: Data are held primarily in Microsoft Office 365, OPAS, Xero and on staff computer hard-drives and work phones. Access is limited to AAM staff and key officers of the charity. All systems are password protected with dual authentication where possible.

Data retention/deletion: Data will be retained provided the data subject does not request data to be deleted; in such instance, data will be retained for the legal minimum of 7 years and then deleted.

Press

Who are they: Freelance journalists, press outlet offices (web-based media, newspapers etc).

Data held includes: Contact information, past engagement (including reviews written).

Types of processing & processing conditions used:

Type of processing	Processing conditions used
Invitations to concerts	Processing is necessary for the purposes of legitimate interests, except where such interests are overridden by the interests, rights or freedoms of the data subject
Disseminating news about the charity	
Provision of information for publications	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

Storage and security: Data are held primarily in Microsoft Office 365, OPAS, Xero and on staff computer hard-drives and work phones. Access is limited to AAM staff and key officers of the charity. All systems are password protected with dual authentication where possible.

Data retention/deletion: Data will be retained provided the data subject does not request data to be deleted.

Children/vulnerable adults

Who are they: Any child or vulnerable adult who takes part in a project or event promoted under the auspices of AAM's creative learning initiative, AAMplify.

Data held includes: Contact details, medical records (eg dietary restrictions or allergies), photographs. For children under 16 parental consent will be requested for any data held by AAM.

Types of processing & processing conditions used:

Type of processing	Processing conditions used
Appropriate recording of any safeguarding incident occurring during an AAMplify project or event	Processing is necessary to comply with a legal obligation
Processing of appropriate performance licensing	
Production of fire / health & safety lists, recording of dietary restrictions and allergies	
Consideration of bursary applications	Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
Production of performer lists in programmes and CD booklets etc	Processing is necessary for the purposes of legitimate interests, except where such interests are overridden by the interests, rights or freedoms of the data subject (NB all use of photography and opt-out rights are covered in AAM's Child and Vulnerable Adult Safeguarding Policy)
Photographs used for funding applications, programmes, on website and promotional publications	

Storage and security:

Data are held primarily in Microsoft Office 365, Infoodle, Xero and on staff computer hard-drives. Access is limited to AAM staff and key officers of the charity. All systems are password protected with dual authentication where possible.

Data retention/deletion:

Contact details and medical records will be retained for 12 months following a project. Thereafter we will only retain a list of participant names. Safeguarding/incident records will be maintained with names suppressed unless we are required to keep a full record for legal reasons, in which case the data subject and/or their legal guardian will be made aware that we have retained the minimum necessary data for this purpose, to comply with legal requirements. Photography will be held indefinitely unless deletion is requested by the data subject or the legal guardian of a data subject if under 16.

Data sharing

The only areas in which AAM might share information with third parties are musicians, staff, service providers (eg box office staff working on AAM's behalf) and supporters (in this case in the fulfilment of a contract, for example, to provide concert tickets, or for the purposes of wealth screening (see also 'Analysis and research of our supporters and potential supporters' below). In all of these instances, we would only share:

- Necessary details; in most cases name and email address only
- With a reputable third party, known to AAM
- When it would be to the direct benefit of the data subject; in most cases, this would be to facilitate an offer of work to the data subject.

Where data is shared with AAM, our procedure is to:

- Use the data (ie contact the data subject) within 30 days
- Tell the data subject that we have their data and how we intend to use it
- Share applicable data promises and privacy notices with the data subject
- Give the data subject the opportunity to opt out from all further communications and have their data removed from our systems.

Data storage arrangements

Data are stored in a number of ways at AAM, all of which have been determined to be secure and compliant with the UK GDPR.

Infoodle	A cloud-based CRM database hosted in Ireland; used primarily for fundraising purposes; password protected, two-factor authentication enable; accessible by AAM staff and key officers of the charity.
Xero	A cloud-based accountancy package hosted in the United States; used to manage all financial transactions across AAM's operations; password protected; accessible by AAM staff and key officers of the charity.
OPAS	A cloud-based orchestra management suite hosted locally on a Microsoft Azure server located in AAM's offices in Cambridge; used primarily for storing contact details for freelance musicians and key industry contacts; VPN and password protected, two-factor authentication enabled; accessible by AAM staff.
Microsoft 365	A cloud-based office solutions suite hosted in the United Kingdom; used to store all key documents and power email for AAM staff; password protected, two-factor authentication enabled; accessible by AAM staff.
Mailchimp	A cloud-based marketing automation and email service hosted in the United States; used primarily for marketing and fundraising communications; password protected; accessible by key staff as required.
PayPal	A cloud-based online payments system hosted in Ireland; used to process online payments via the AAM website; password protected, two-factor authentication enabled; accessible by key staff as required.
Stripe	A cloud-based online payments system hosted in Ireland; used to process online payments via the AAM Live website; password protected; accessible by key staff as required.
Square	A cloud-based online payments system hosted in the United States; used to process online donations via the AAM website; password protected, two-factor authentication enabled; accessible by key staff as required.
WooCommerce	A cloud-based e-commerce plugin for WordPress, which is hosted worldwide; used to process orders placed on the AAM website; password protected; accessible by key staff as required.
DropBox	A cloud-based storage system hosted in the United States; used primarily for sharing media files with external stakeholders and storing archived planning documents; password protected, two factor authentication enabled; accessible by key staff as required.
Google Drive	A cloud-based storage system hosted in the United States; used primarily for sharing planning documents internally and to facilitate team working (no data held long-term); password protected; accessible by AAM staff.
Computers	Physical laptop and desktop computers used by members of staff in Cambridge, Littleport, Whittleford, Belfast and remotely; Microsoft Azure server located in AAM's offices in Cambridge and accessible remotely via VPN and password; hard drives to be PIN protected in 2021; accessible by AAM staff.
Office	Physical archive (including old management documents, board minutes, contracts, performance schedules, concert programmes, financial records etc) located on-site at AAM's Cambridge offices; premises are locked and alarmed; accessible by AAM staff, building owners (AgeUK) and cleaners.
Home offices	During the pandemic each member of staff has responsibly to store any data as securely as possible whilst working from home, returning it to the office as soon as possible where appropriate, and/or disposing of data securely; staff are required to ensure that data are not accessed by anyone else and that breaches are reported.
Donor Strategy	Defunct CRM database stored locally on Microsoft Azure server located in AAM's offices in Cambridge; previously used for storing donor information, but replaced by Infoodle and maintained now as a backup; VPN and password protected; accessible by AAM staff.

Fundraising & Privacy and Electronic Communications Regulation (PECR)

We will only send fundraising emails when the recipient has specifically consented to receive such, or where they are an existing supporter who has donated to AAM's work in the past.

We will only telephone people regarding fundraising where we have a legitimate interest to do so. If contact details are given to us by a third party or they are in the public domain, we will follow the steps laid out below unless they are in the Telephone Preference Service.

Whether we contact people by email or phone regarding fundraising, we will ensure that it is always clear and easy for them to opt out of further communications, or to request that their personal data be removed from our systems.

In instances where we are given contact details by a third party, or where details are in the public domain, we will:

- Ensure that the third party can justifiably believe the subject would wish to hear from AAM
- Contact the subject within 30 days, so that their data is not held without their knowledge
- Explain how we have their data and why we wish to contact them
- Give them the option to opt out immediately and have their data removed from our systems

Data Subject Rights

Subject Access Requests

We will give an initial response to any Subject Access Request (SAR) within one week and take action within one month. SARs will be handled by the relevant staff member depending on the data area.

We will, upon request, provide the following information:

- What data is held, how long we have held it and why.
- Who has access to that data and any ways in which that data has been shared, or might be shared in the future.
- The subject's options with regard to what data is held/used in the future, including partial or total deletion of data, limits to data sharing and changes to the way in which we communicate or the frequency of those communications.

Data breaches

Any member of staff who becomes aware of a data breach must report the breach and all relevant information to the Chief Executive. Should a breach occur:

- The Chief Executive should inform both the data subject and the Board of Trustees of the breach and our efforts to correct the situation within 2 weeks of the initial report.
- The appropriate member of staff will then resolve any technical issues which have led to the breach and inform the ICO (where applicable).

Data deletion

We take a request for data to be deleted very seriously. However, there are several reasons why we would not entirely delete data:

- Financial records: we are required to keep a record of incoming and outgoing payments for 7 years, so financial data linked to a data entry would be retained
- To ensure that someone is not contacted against their will, we must retain a record of that request and sufficient data to identify them correctly in future.

In the event of a deletion request we will therefore reduce data to a 'stub' entry, with sufficient information for identification purposes retaining financial information for the minimum period necessary.

Responsibility

Whilst policy decisions have been taken, in consultation with colleagues, it is each member of staff's responsibility (whether employee, freelancer or chair) to make themselves aware of this company policy and to act accordingly. This is reflected in the staff handbook and will be included in all staff contracts in future.

DATA PROMISE

The Academy of Ancient Music is committed to protecting your personal information. We need to collect personal information to allow us to carry out our business, but it is your data, and beyond being required by law to take exceptional care of these data, we place an immense value on the relationship and trust we have with all our audience, supporters, and those with whom we work. We use the information that we collect about you in accordance with the UK General Data Protection Regulation and the Privacy and Electronic Communication Regulation.

This privacy policy details how and when we collect your data, how we store it, and how we use it. We may update our privacy policy, with any changes being made to this page. If the change is significant, we will make this clear either on our website, or by contacting you.

Our promise to you

AAM is committed to:

- Providing the data subject with clear, honest, open information about how we use their data
- Giving the data subject choice about how we use their data
- Using data appropriately, in line with the data subject's reasonable expectations
- Only sharing data with third parties where there is a legitimate interest or the data subject has consented, and only then with organisations that share our commitment to these principles.
- Actively guarding against data breaches, storing data in an accountable and responsible manner. We will inform data subjects and the ICO of any data breach (where applicable) should it occur.
- Maintaining separate and enhanced procedures for the use of sensitive data (eg data regarding children or disability).
- Ensuring that our staff and partners understand these principles and their responsibilities in delivering them.

How and when do we collect data?

1. Sign-up to email list
 - a. If you opt in to receive our emails by signing up via our website; and
 - b. If you complete an audience card at one of our concerts including your email address and a tick in the consent box.
2. Booking tickets
 - a. If you are an Academy or Associate member and buy a ticket for a concert through the AAM office;
 - b. If you buy a subscription to our Cambridge concerts through the AAM office.
3. Fundraising
 - a. If you donate, join AAM Friends, AAM Associates or AAM Academy, or let us know that you will be leaving a gift in your will.
 - b. Through Trustees and Development Board members, if we believe you may be interested in supporting AAM
 - c. Through third party research companies (see also 'Analysis and research of our supporters and potential supporters' below
4. Corporate contacts
 - a. If you are associated with AAM in a corporate sense, as an advisor, trustee or similar;
 - b. If you contract, are contracted by, AAM to provide a service; and
 - c. If you work on a production involving AAM.

5. *External contact*
 - a. *If you make contact with any of our staff and request that any information is sent to you; and*
 - b. *When buying a CD via our website*
6. *Visits to our website*
 - a. *We use cookies to help make your experience of our website better. A cookie is a small text file that is temporarily stored on your device when you visit a website. It does not contain any personal or identifiable information and can be deleted or blocked at any time, though this may result in the loss of some functionality. You can find more information here: <https://www.allaboutcookies.org>.*
 - b. *Our website may contain links to external third-party sites which will have policies of their own with regard to privacy. AAM is not responsible for the privacy policies or content of any of these external sites.*

How we store data

Personal data is held and processed on systems managed by, or managed by suppliers on behalf of, the Academy of Ancient Music held on local or cloud-based systems. They contain personal data for our supporters, donors, audience, and others we work with when carrying out our business activities. Access to these systems is password-controlled and restricted to relevant parties.

What data do we keep?

We only collect information necessary to carry out our business, provide any particular service you've requested, and to keep you informed:

1. *Email list*
Our email list holds email addresses, and, if supplied, your name. The system used to send emails allows analysis of which communications you have opened and clicked on.
2. *Our in-house systems may include the following fields of information about you, if supplied by you, if obtained through publicly-available sources like Companies House, LinkedIn, and information that has been published in newspapers/articles, or if required for us to carry out our business:*
 - a. *Name and title*
 - b. *Your relationship with AAM*
 - c. *Email address*
 - d. *Postal Address*
 - e. *Telephone number*
 - f. *Date of birth*
 - g. *Spouse, partner or known contact name*
 - h. *Image or likeness*
 - i. *Relationship to other individuals on the database*
 - j. *Correspondence between AAM and you*
 - k. *Attendance at AAM events*
 - l. *Details of transactions between AAM and you*
 - m. *Details of a legacy gift left to AAM in your will, if you have informed us*
 - n. *Biographical information from publicly available sources.*
3. *For those who work with us, we may also hold the following sensitive data, as required, for us to carry out our business:*
 - a. *NI number*
 - b. *Tax reference*
 - c. *Bank account*
 - d. *Passport details*
 - e. *VAT number*

What do we do with your data?

1. *When necessary for the performance of a contract, including anyone purchasing goods or a service from AAM, and anyone contracting or contracted by AAM*
2. *When we have your consent, including sharing news and information about AAM activities, and ways to support AAM Data is used to contact people for the following purposes:*
 - a. *Offers of work and contractual arrangements for musicians*

- b. News of forthcoming projects, CD releases and performances for the general public
 - c. Exclusive news for our supporters
 - d. Fundraising campaigns
3. When it is in our legitimate interest, including: ensuring the information we hold on you is up-to-date; understanding your interests and reasons for supporting AAM; segmenting our audience data to ensure we send you relevant information; understanding how you respond to our marketing and communications; to build a profile of potential audiences and supporters; commercial and promotional purposes; and, to research and carry out due diligence on donors;
 4. When it is a legal obligation, including supplying information to statutory bodies;
 5. When it is in your vital interest, for example, in a medical emergency.

Analysis and research of our supporters and potential supporters

By building a picture of those who support, or could potentially support AAM, we are able to improve the level of service that we provide, and better understand your interests and preferences so that we are talking to you about what interests you – this in turn means we can fundraise more efficiently and make sure your donation has the greatest possible impact on AAM.

When we build a picture of our supporters and potential supporters, we may use:

- Your donation history with AAM
- Geographic, demographic, and other information you have provided to AAM.
- Publicly available information, including Companies House, LinkedIn, 192.com, and information that has been published in newspapers/articles.
- We also carry out due diligence in advance of asking supporters for major donations. Before seeking or accepting large donations we are required to conduct checks, including reviewing publicly available data relating to criminal convictions and offences, to ensure that by accepting the donation we are not risking the reputation of AAM.

We may also use trusted third party wealth screening companies and insight companies to provide us with general information about you. Such information is compiled using publicly available data about you or information that you have already provided to us. If you would prefer us not to use your data in this way, please e-mail support@aam.co.uk or call 01223 341090.

Data Sharing and Third Parties

- We will never sell or rent your data to other organisations.
- Some of our service providers will be given access to your data in order to perform services on our behalf – for example payment processing or mailing houses. We make sure anyone who provides a service for the Academy of Ancient Music enters into an agreement with us and meets our standards for data security. They will not use your data for anything other than the clearly defined purpose relating to the service that they are providing.
- Third party advertisers (such as Facebook or Google) to help us identify customers similar to our audience or to serve relevant adverts to you on third party websites. Any information shared with such advertisers is anonymised.
- We may also share information with wealth screening companies as stated above

Occasionally we might receive your data from a third party, such as a concert hall or promoter, because they believe that you may be interested in our work and activities or may wish to work with us and where you have given your consent for data to be shared. In such instances we will endeavour to let you know that we have received your data at the earliest possible juncture, giving you the opportunity to opt out from all future contact or have your data deleted should you so wish.

Your information may be shared with us by independent fundraising sites such as JustGiving or Donate, but only when you indicate that you give your consent to hear from us.

In all instances, you should check the third party's Privacy Policy to understand how they process your data.

Recordings and images

AAM may capture audio and visual recordings at AAM events for archive, commercial, and promotional purposes, including audio recordings, website, social media accounts and advertisements. This may include the capture of your personal data including image and likeness. If we process this data, it will be done on a legitimate interest basis, meaning we would not seek to obtain specific consent for use where personal data is only used in a background capacity, or for internal use.

Your rights

At any time, you have the right to:

- *Request a copy of the personal information that AAM hold about you;*
- *Request that inaccuracies in that information be corrected;*
- *Request that we stop processing your data;*
- *Request that we delete your data from our systems (a hidden 'stub' entry will be retained, so that we can identify you correctly in the future and ensure that you are not contacted in error: details of this will be provided at the point that you request that your data be deleted);*
- *Lodge a complaint with the Fundraising Regulator or the Information Commissioner's Office.*

How you can opt out of hearing from us

If you prefer not to receive emails from us, you can unsubscribe at any time. Simply scroll to the foot of an email and click 'unsubscribe'. Our systems will then not allow us to email you until you actively sign-up again.

If you no longer wish to receive information from us via post or telephone, please email info@aam.co.uk or call 01223 301509.

If you want to contact us to discuss your data and how we collect, use and store it:

*Data Protection Officer
Academy of Ancient Music
Cherry Trees Centre
St Matthew's Street
Cambridge CB1 2LT*

*Telephone 01223 301509
Email info@aam.co.uk*

You have the right to lodge a complaint with the supervisory authority, The Information Commissioner's Office – www.ico.org.uk

Policy approved by John McMunn, Chief Executive
April 2023
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