



PoppyHarp PRIVACY POLICY

We value our customers and respect your privacy. PoppyHarp is completely transparent how it uses your details and why we need to use your personal information. As you browse the PoppyHarp website and whenever you communicate with us, we collect information. It helps us to develop an understanding of what our clients like, what works on the website and what doesn't. This in turn enables us to improve our communications and work more effectively. The more we understand about our clients and the people we engage with, the more efficiently and productively we are able to operate. We take protecting your privacy very seriously and will always take all reasonable steps within our power to make sure your information is safe.

This privacy policy applies to all personal information we collect or process about you.

'Personal information' is information, or a combination of pieces of information, that could reasonably allow you to be identified.

Please read our Privacy Policy carefully before becoming a member of our mailing lists in order to fully understand how we collect, use and store your personal information.

We may update this policy from time to time without notice to you, so please check it regularly, particularly if you are sending personal information to us. Any significant changes will be notified to you.

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1. About PoppyHarp

PoppyHarp is an online harp community run by Mrs Francesca (Fran) Barsby. PoppyHarp work includes bookings and communications for Fran Barsby Harpist, membership to PoppyHarp Online Harp School and payments made to our online store. We also run the PoppyHarp Composers Project and PoppyHarp Competitive Harp Festival. We work closely with harp manufacturers and harp companies including Accusound, Pilgrim Harps, Silver Spear Harps, Bow Brand Strings and Jack Hayward Insurance to mention a few.

2. Why we collect your personal information.

In order to secure bookings, take payments for online services, products, memberships, run our competitive festival and composers project we collect the minimum amount of personal data required to process these services.

In order to provide the best possible service to each customer we need to have effective communications between ourselves and our customers. Through understanding more about what clients are looking for from PoppyHarp, we can improve how we communicate with you ensuring you hear about advertisements, events or products that would interest you.

3. When we collect information, what information we collect, how we collect it and what we use it for.

We collect information every time you interact with us. The type and quantity of information we collect and how we use it depends on why you are providing it.

There are many instances in which we may collect information about you.

For example, we may collect information when you:

- Become a member of PoppyHarp Mailing List

(We only collect your name and email address for this service and you can choose to opt out at any time.)

- Become a PoppyHarp Online Harp School member.

We use the Paid Membership App to process our membership payments.

Their privacy policy can be seen here https://paidmembersapp.com/privacy_policy

During your time as a PoppyHarp online harp school member we will have access to the information you provide including: date of payment, name, contact email. Your email address and name will be retained and used to set you up an account on our website. This data will be removed immediately after your membership has lapsed. Our website host is Weebly and their privacy policy can be found here: https://www.weebly.com/privacy?lang=en_GB

- Purchase from our website (your personal information is only kept for order processing and handling purposes. PoppyHarp does not have access to your full payment details. Payments can be made via stripe and our weebly platform: <https://stripe.com/gb/privacy>

Refunds are also provided through these services.

- When you visit one of our websites or social media pages via tools such as cookies and online identifiers, including if you make comments on our message boards or discussion forums (This data is controlled by yourself and you are able to delete your comments at any time). Please view our cookie policy for more information or alternatively you can click the cookies bar for more information on arrival on our website.
- When applying for the PoppyHarp composers project we collect your name, email address and any personal information you send us in relation to the competition. This data is then held and accessed by authorised members of the PoppyHarp team.
- PoppyHarp Competitive Harp Festival. We retain full names for your certificates, videos are published on our YouTube Chanel <https://www.youtube.com/channel/UCW5WIY9mOFsVpj3O4f-DYOA> These videos are then displayed on our website. This video can be removed at any time by emailing info@poppyharp.com
- Apply for a job with us. (Your data is only kept until the job has been filled or if you were successful in your application, your data will be kept for the duration of your employment. .)
- Contact us or become involved with us in any other way than as stated above. You may email us and we will keep your name and information sent to us for as long as we need to fulfil your request.
- Contracts are used and signed by clients of Fran Barsby for harp tuition. On these contracts, names are collected and retained for the duration of your tuition.

The information we may collect from the above interactions may include, but is not limited to any of the following:

- Your name, address, telephone number, mobile number, and email address, along with your preferences as to how we should contact you in the future
- We may collect your year of birth or date of birth in order to verify you are an adult as it is our policy not to market to children and there are some services we are not able to provide to under 18's. This information is not kept once verification has been made.
- Financial and credit card information which you give to us (note that we do not store credit card information) If payments are made through our website they are handled through Stripe payments.
- Information you enter onto our website, such as your contact information.
- Records of your purchase history and correspondence with us
- Images, photographs or video if you take part in an event with us (and have provided consent for us to use these photos/videos)
- Details of your visit to our websites, including technical information such as the IP address you use to access the website, your device, browser type and version

We only collect information about you via **Direct Interaction**.

We acquire information directly from you, for example when you become a member of the PoppyHarp mailing list or when you make a purchase with us. We may obtain your personal information through your use of social media such as Facebook, Twitter or Instagram, depending on your settings or the privacy policies of these social media services. To changes your settings on these services, please refer to their privacy policies which will tell you how to do this.

Alterations to your personal details.

We are unable to update information without your consent. Please contact us regularly with changes of telephone numbers, email addresses, home addresses, change of profession or bereavements.

We use personal data for a number of different processing activities which include:

- Providing you with the goods or services you have requested
- Keeping you up to date with events we are involved in.
- Keeping a record of your relationship with us
- Managing your communication preferences, including marketing preferences
- Understanding how we can improve our services, products or information
- Sending you tailored communications and displaying relevant adverts which we think will be of interest to you
- Sending you marketing materials including events
- Analysing our database for statistical purposes, and to better communicate with you about things we think will be of interest. Note that this is on a generic rather than an individual level to ensure that our communications are cost effective
- Sending you details of products you can buy on our online shop and giving you information on similar products if you have already purchased from us and have not opted out of receiving such information.

4. Our legal basis for processing data.

All of our use of personal data is in accordance with the law. The law requires us to only process data where we have a valid legal basis for doing so. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the **contract** we are about to enter into or have entered into with you, such as providing you with the service you have requested, (for example rental agreement for a harp, update to membership to mailing list and to contact you about these in order to administer your request).
- Where it is necessary for our **legitimate interests** and your interests and fundamental rights do not override those interests (as set out below).
- Where we need to comply with a **legal or regulatory obligation**, (for example to satisfy our legal, regulatory and compliance obligations).
- Generally we do not rely on **consent** as a legal basis for processing your personal data other than in relation to sending email or text message (and in some instances by phone) direct marketing communications about events, purchases and more (as detailed in section 5. We may also provide you information on similar products you may purchase from our online shop, if you have previously purchased from us, and have not opted out of receiving such information. You have the right to withdraw your consent to marketing at any time by contacting us or clicking the unsubscribe link in the email communication we send you.

PoppyHarp interests include administering the company sending you marketing materials by phone and post, and understanding our clients. A summary of each of these and some examples of how we may use your data in these ways on the basis of it being within our legitimate interests to do so are set out below:

1. **Administration of the company.** As a small business our mission is to provide the best possible service to our customers. In order to deliver this service, we need to undertake

certain processing activities. Some of these will be for trading, and some will be for operational administration reasons.

Specific examples of processing activities under this legitimate interest include:

- Recording your communication and marketing preferences and maintaining suppression files so we don't contact you when you have asked us not to
- Keeping a record of who our clients are, your relationship with us, and your order history
- Reviewing our database of clients across the organisation for historical, scientific and statistical purposes
- Operational administration such as:
 - Recruiting and processing job applications
 - Keeping employee records and monitoring
 - Health and Safety
 - Management and planning purposes
 - Keeping you up to date with the news and events
 - Administering your donation by sending your bank details to our bank
 - Financial management and controls such as:
 - Processing supplier invoices
 - Taking steps to prevent fraud, knowing our donors, and taking steps to ensure there is no misuse of services or money laundering
 - Enforcing legal claims including debt collection and out of court expenses

To contact you by post and phone. Contact with our clients is vital to the way we operate – when you purchase from PoppyHarp. you are joining a harp family. We want to keep in touch with you and, along with telling you about exciting upcoming events, we also want to keep you up to date with the numerous activities you can get involved with. We believe it is in our legitimate interest to send you such materials by post and to speak to you by phone, unless you have told us you prefer us not to. Specific examples of processing activities under this legitimate interest include:-

sending marketing materials as detailed below, including:

- Asking for financial information during a purchase
- Inviting you to take part and attending our events via text or email
- Inviting you to events by post and phone
- Sending you details of products you can buy from our online shop by post
- Providing you information on similar products you may purchase from our online shop, if you have previously purchased from us, and have not opted out of receiving such information

Specific examples of processing activities under this legitimate interest include:

- Analysing our database and seeing what has worked and what hasn't. This helps us develop our products and services, and helps inform our marketing strategy so we only send you information that we think will be of interest to you, and so that we understand the effectiveness of the marketing we serve you.
- Researching your interests - we want to utilise your donations in the most cost effective way, and so we don't send blanket messages to the entirety of our database. Rather, we deliver content we think will be relevant to you and personalised when appropriate.

- In limited circumstances, analysing the personal information we collect about you and using publicly available information to better understand your interests, preferences and level of potential donations so that we can contact you more effectively.
- Customising your experience and displaying more relevant information (including adverts) to you.

If you would like more information on our uses of legitimate interests or to change our use of your personal data in this manner, please contact us.

5. What we communicate with you about.

We communicate with you about what you have asked us to – to provide the service you have requested. For example, if you have signed up to a mailing list, we will keep you in touch with our events. If you have purchased an instrument, we will keep you up to date with any additional information the purchase may require, such as warranty and servicing.

MARKETING

In addition to product information, we may also contact you about event news and updates on our work. The law distinguishes between the channels you choose to receive this information, and so we give you different options when we ask to use your data in this way.

We will always ask for your consent if we want to contact you by email or text message, however we do not normally ask for consent to make telephone calls to you or write to you about any of these three things (provided you haven't specifically told us you don't want to receive them or if your telephone number is registered on the Telephone Preference Service).

When you give us your details we will tell you what we are going to do with them. You will always be given the opportunity to opt-out of receiving these materials by phone and post if you prefer not to. You can unsubscribe at any time.

While we don't usually ask, there are some instances where we may have expressly asked you for consent to receive telephone calls or letters from us (for example, if you gave us your details through our events in person). If you have consented for us to contact you in these ways, we will continue to do so unless you tell us via email or by post not to.

In addition, where you have visited our online shop and provided us your details, then we may send you information about similar products which we think will be of interest to you, where you have not opted out of receiving such information. We will also always provide an opportunity for you to opt-out in every communication we send you about these products.

6. Marketing Preferences

We make it easy for you to tell us how you want us to communicate with you. Our communications have clear marketing preference questions and we include information on how to opt out when we send you marketing materials, which in the case of emails, is by means of an unsubscribe link.

You can change your marketing preferences at any time by [contacting us](#).

Where you have previously provided us with your telephone number, please note that we may use that telephone number to call you (provided you are not registered with the Telephone Preference Service - TPS). You can of course change your preferences at any time if you wish to as detailed above.

Please note that changing your marketing preferences will not affect the communications we send you where it constitutes the service you have requested – for example, if you have signed up to

join us as a member of our teachers list, then you tell us you do not wish to receive information on our products and events, you will still receive your teachers/professional harpist updates.

7. Who we share your data with.

We do not sell or share personal details with third parties so that they can market to you. Depending on your settings and the privacy policies for social media and messaging services like Facebook and Instagram, you might give us permission to access information from those accounts or services. For example, we occasionally participate in Facebook's "Custom Audience" program which enables us to display adverts to our existing or potential clients via Facebook. We provide personal information such as your email address to Facebook to enable them to determine if you are a registered account holder with Facebook. Our adverts may then appear when you access Facebook and on your Facebook feed. Your data is sent in an encrypted format that is deleted by Facebook if it does not match with a Facebook account. For more information please read the [Facebook Business page about Custom Audiences](#) and [Facebook's Data Policy](#).

In other cases we will not disclose any of your personal data except in accordance with this policy, or when we have your permission, or under special circumstances, such as when we believe in good faith that the law requires it or to protect the rights, property and safety of our company, or others. This includes disclosing your details if required to the police, regulatory bodies or legal advisors.

8. How we keep your data safe

We have appropriate physical, technical and managerial controls in place to protect your personal details; for example our online forms are always encrypted and our network is protected and routinely monitored. Within our offices only those who have a business need to access your information and who are trained in handling data securely will have access to your information.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Whilst we hope it will never happen, we have procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are required to do so.

When we use external companies to collect or process personal data on our behalf we undertake due diligence on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, including keeping and using your data securely.

Our website may, from time to time, contain links to third party websites. If you follow a link to any of these websites, please note that these websites will have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Despite all of our precautions however, no data transmission over the internet can be guaranteed to be 100% secure. So, whilst we strive to protect your personal information, we cannot guarantee the security of any information which you disclose to us and so wish to draw your attention that you do so at your own risk.

Where we have given you (or you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential, and we ask you not to share this with anyone.

9. Keeping your information up to date

We really appreciate it if you let us know if your contact details, or circumstances change.

You can also update your details online at any time via our change [contact page](#).

10. How long we keep your data for

We will only keep your personal information for as long as is necessary for the purpose for which it is collected, which may include the purpose of satisfying any legal, accounting or reporting requirements. If you request that we stop sending you marketing materials we will keep a record of your contact details and the appropriate information to enable us to comply with your request not to be contacted by us.

In order to determine how long we keep your data we look at the category of data and the reason we collected and have processed it. We look at whether that reason is ongoing and whether you are an active client or not. We consider you to be an active client if you have opened our mailings and have interacted with us in some way such as if you have corresponded with us, signed up for a events and/or purchased from us any time within the preceding 10 years.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve these purposes through other means, and the applicable legal requirements.

Client Data

If at any time you cease to become an active client then we continue to send you communications for a limited period of time (no more than 3 years for email and SMS (text) communications, and 5 years for post and phone call). We will keep your details for a further period of time for legitimate purposes such as legal and regulatory reasons (for example, the HMRC requirement that we keep financial information for 7 years after your last purchase from us).

When we anonymise or delete your data, we will ensure that it is no longer identifiable to you. We may keep anonymised data for future analysis on aggregated data so that we can understand our clients better. This may be for research or statistical purposes, or for any other purpose, and we may use this information indefinitely without further notice to you.

11. How to find out what information we have about you

You can request the details of the personal information we hold about you.

If you want to access your information, please [Contact](#) us and send a description of the information you want to see and proof of your identity.

We may then need to ask you for further information in order to service your request, such as confirmation of your identity, or whether there is any specific data you would like or from a specific time period. We may send you a form in order to assist you in this.

We will respond to you within one month of your legitimate request. You will not have to pay a fee to access your personal data however we reserve the right to charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively we may refuse to comply with your request in these circumstances.

12. How to change the way we contact you.

You can ask us to stop sending you marketing messages at any time by completing the form on our [contact page](#) to adjust your marketing preferences, by contacting us, or by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving marketing messages from us, please note that you will still continue to receive items to perform the service you have asked of us. You can opt back in at any time by contacting us.

If at any time you'd like us to change how we contact you (via email, SMS, phone or post), please email us: info@poppyharp.com

We will only email or text you if we believe you have consented for us to do so. In every email or text we send there will be instructions on how to unsubscribe. During any phone conversation you have with us please feel free to let us know how you prefer to be contacted.

Due to the timing of our mailings, there may be a delay of up to 6 weeks before your instruction is actioned and during this time you may still receive mailings from us.

Please note that if you request that we stop sending you marketing materials we will keep a record of your contact details and the appropriate information to enable us to comply with your request not to be contacted by us.

13. What to do if you don't want us to process information about you.

If you don't want us to collect information about you as you browse our website you'll need to set your browser to notify you when you receive a cookie, then choose to decline it. (There is a pop up at the top of every one of our webpages)

If you don't want us to hold any personal details about you, it's best just not to give them to us. If you want us to stop collecting information about you or processing that information then please let us know by [contacting us](#).

If you object to any of the processing described in this privacy policy then you have the right to object to that processing in certain cases. Unfortunately this means that we may not be able to process your data any longer or provide you with certain information or services.

We will need to keep a copy of your name, postcode and email address so that we can identify you on our suppression list to ensure we do not contact you any further or process your data in the way that you have objected to.

14. Your rights

Under data protection laws you have various rights over your personal data. If you would like to exercise any of these rights then please contact us.

You have the right to:

ACCESS YOUR PERSONAL DATA

You have the right to request access to your personal data, commonly known as a 'subject access request'. This enables you to receive a copy of the personal data we hold about you.

REQUEST CORRECTION OF YOUR PERSONAL DATA

You can request that we correct the personal data we hold about you. This enables you to have an incomplete or inaccurate data we hold about you corrected, although note that we may need to verify the accuracy of the new data you provide to us

REQUEST DELETION OF YOUR PERSONAL DATA

You have the right to ask us to erase your personal data in certain circumstances. Please note however that there may be circumstances where you ask us to erase your personal data but we are legally required or entitled to retain it.

OBJECT TO PROCESSING OF YOUR PERSONAL DATA OR REQUEST RESTRICTION

Where we are processing your data under the legitimate interest condition, then you may object to this processing, or request that the processing is restricted, if there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. Note that there may be circumstances where

you object to, or ask us to restrict, our processing of your personal data but we are legally required or entitled to continue to processing your personal data and/or to refuse your request. In some cases, we may demonstrate that we have a compelling legitimate ground to process your information which override your rights and freedoms.

REQUEST TRANSFER OF YOUR PERSONAL DATA

In certain circumstances you are able to request a transfer of your data from one service provided to another, such as from one service provider to a competitor.

WITHDRAW CONSENT

Where we have asked you for consent to process your data, you may withdraw this consent at any time by contacting us. Please note however that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so.

15. Update History

This policy was last updated 28th April 2024. It was re-worded to give you further information about how we collect, use and store your personal data, and to reflect the changes in law as set out in the General Data Protection Regulation and to give you more clarity on how we use your data, and your rights in relation to it.

We may amend or update this policy at any time to take account of any changes to data protection law or other legislation. When further updates to the policy are made they will be available to view on this document, so please check back here regularly. Any significant changes will be notified to you.

16. Additional information

The laws that dictate how your personal information can be used are:

- The Data Protection Act 1998
- The Privacy and Electronic Communications Regulations 2003
- The EU General Data Protection Regulation

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. Please contact us if you have any queries or complaints.

17. Contact us.

If you have any questions after reading our Privacy Policy please contact us:

info@poppyharp.com

07713907808

Professional virtual address:

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