

CALA RECORDS LIMITED

DATA PROTECTION POLICY

1. FINANCIAL DATA

1.1 WEB TRANSACTIONS

- 1.1.1 Cala Records and babymusic.com website transactions are processed by third-party payment providers, WorldPay and Paypal, and are subject to the Terms and Conditions of those companies.
- 1.1.2 The order forms generated by the site software do not contain the credit card details of the customer.
- 1.1.3 The reports of transactions provided to Cala Records by the Payment Service Providers do not contain full credit card details of the customer.

1.2 CUSTOMER NOT PRESENT TRANSACTIONS

- 1.2.1 Cala Records maintains a Worldpay Streamline online terminal for the processing of customer orders that have been made by post, email, fax and telephone. Such transactions are subject to the Terms and Conditions of Worldpay.
- 1.2.2 The Merchant Receipts for such transactions do not contain the full credit card details of the customer.
- 1.2.3 The Merchant Receipts are stored for a period of up to three months from the date of transaction for the purposes of bank account reconciliation, and then shredded.
- 1.2.4 Customers are encouraged to make orders by post, telephone or fax as the safest methods of transferring data.
- 1.2.5 Should customers wish to send data by email they are encouraged to split the data over several emails.
- 1.2.6 Customer CC data that is written down on paper in the office of Cala Records is shredded at the successful conclusion of the transaction.
- 1.2.7 Emails containing customer CC data are permanently deleted from the receiving computer(s) at the successful conclusion of the transaction.
- 1.2.8 Emails containing bank account numbers and sort codes for BACs transactions are permanently deleted once the details have been put into the bank server. No software records are kept on the company's computers, and no hard copy records are kept.

2. CONTACT DATA

2.1 WEB TRANSACTIONS

- 2.1.1 Cala Records and babymusic.com website transactions require the delivery address, phone number and email address of the customer for the purposes of order fulfilment and possible contact to resolve difficulties.
- 2.1.2 Customer contact data is held by Cala Records in both accounting software and hard copy printout for legally required record keeping under the Companies Act 2006, for a period of six years.
- 2.1.3 Cala Records does not disclose customer contact details to any third party other than for the purposes of goods delivery
- 2.1.4 Cala Records does not sell or otherwise pass on contact data to any other third party.

2.2 CUSTOMER NOT PRESENT TRANSACTIONS

- 2.2.1 Cala Records enters customer contact data received by phone, post, fax or email into its accounting software to process orders, and maintains hard copy printout for legally required record keeping under the Companies Act 2006, for a period of six years.
- 2.2.2 Cala Records does not disclose customer contact details to any third party other than for the purposes of goods delivery.
- 2.2.3 Cala Records does not sell or otherwise pass on contact data to any other third party.

3. MARKETING POLICY

3.1 EMAIL MARKETING TO THE EXISTING CUSTOMER DATABASE

- 3.1.1 Cala Records does not send out regular emailings to a customer list, but may from time to time email existing customers on a Legitimate Interest basis. Such Legitimate Interest may be defined by such factors as:
 - A new recording by an artist previously purchased
 - A new recording in a genre or repertoire area previously purchased
 - A new recording which complements a previous purchase in some other way
 - A new recording which expands an existing line of recordings of which a previous purchase has been made
 - A new recording or publication of interest to the players and lovers of a particular instrument, ensemble or genre of music.
 - A new recording or publication of interest to musicians, music societies, music educators or other specialist trade or interest group.
- 3.1.2 In such email marketing, an opt-out option will be provided.

3.2 ONLINE CUSTOMER CONSENT

- 3.2.1 Cala Records provides an opt-in checkbox at checkout on its websites. Customers, by ticking this box, indicate they consent to future mailings from the company.
- 3.2.2 In the case of Cala Records desiring to use customer feedback for quotation on its websites, or in any external publicity material, the consent of the customer will be sought before such quotation is placed. Such consent will include agreement about the degree of anonymization of the customer quotes.

4. WEBSITE SECURITY

- 4.1.1 In common with standard practice, our web hosts store server log files with such information as IP addresses, browser credentials and pages visited with dates and times. There is generally no way to link such log file data to individuals, and such logs are needed to keep the server secure, by looking for attempted forced entries, denial of service attacks etc.

4.2 Cookie Policy

- 4.2.1 To make this site work properly, we sometimes place small data files called cookies on your device. Most commercial websites do this. A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another
- 4.2.2 *Essential Cookies*: these are part of the operation of our software which are necessary for the correct operation of the site, in showing you our products and taking your orders. Some will also be placed in your browser if you set

preferences or use the "Remember Me" function, so that you do not have to re-enter information on subsequent visits.

- 4.2.3 *Inessential Cookies*: These gather data for analytics purposes, and such data can generally not be traced back to individuals. Cala Records sites do not carry advertisements or other third-party material, so do not set cookies in respect of such material.
- 4.2.4 Our cookie menu offers you the choice of accepting or not accepting cookies. Enabling the cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that some features of this site may not work as intended.
- 4.2.5 You can control and/or delete cookies as you wish (for details, see aboutcookies.org). You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

5. GDPR

5.1 Under GDPR legislation, customers have the following data rights:

- 5.1.1 a right of access to a copy of the information comprised in their personal data
 - 5.1.2 a right to object to processing that is likely to cause or is causing damage or distress.
 - 5.1.3 a right to prevent processing for direct marketing
 - 5.1.4 a right to object to decisions being taken by automated means
 - 5.1.5 a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed
 - 5.1.6 a right to claim compensation for damages caused by a breach of the Act
- 5.2 Cala Records will undertake data protection impact statements when commencing any new type of activity involving the use of held data.