

PRIVACY POLICY

1. Introduction

Kelsey Hopper residing at 158, rue de Treves, L-2630 Luxembourg, Grand-Duchy of Luxembourg (“**Kelsey Hopper Music**”, “**we**”, “**us**”) is a certified music teacher giving and organising music classes.

In the context of our activities, Kelsey Hopper Music collects, holds, discloses and/or otherwise processes personal data. Pursuant to applicable Data Protection Laws (as defined below), Kelsey Hopper Music qualifies as the controller with respect to the personal data that it processes.

Kelsey Hopper Music also runs, controls and operates a website www.kelseyhoppermusic.com (the “**Website**”).

Kelsey Hopper Music is committed to respect your privacy according to the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “**GDPR**”), as well as the applicable national implementing laws and to the Law of 30 May 2005 setting out specific provisions for the protection of persons with regard to the processing of personal data in the electronic communications sector, as amended (together, the “**Data Protection Laws**”).

Kelsey Hopper Music takes your right to privacy very seriously. This policy (the “Privacy Policy”) states what data we may collect, how we may use that information and to whom your personal data may be disclosed by us. Further, this policy includes important information regarding your rights with respect to the processing of your personal data. Therefore, we encourage you to read this policy very carefully.

Please note that the content of this document may be changed by Kelsey Hopper Music at any time. The most recent version of this Privacy Policy is available on the Website. We encourage you to regularly review this Privacy Policy. You may also ask us to send you a copy of the most recent version of this Privacy Policy.

2. Whose personal data do we collect

The personal data processed by Kelsey Hopper Music includes:

- a) personal data allowing your identification (such as your name, gender, age, birth date, electronic address, telephone number and postal address, academic level, previous music experience and music preferences);
- b) financial data (bank account number);
- c) photos, voice recordings and possible video footage;
- d) general information that is contained in server log files such as your IP address (the unique address which identifies your computer on the internet), the type of internet browser you use and which website you came from to access our Website, as well as time and duration of your connections.
- e) Health data such as, allergies, learning differences (ADHD, ADD, autism, etc.).

3. How do we collect personal data

Kelsey Hopper Music collects information about you in various ways:

- a) directly from you, for example when you enroll to music classes;
- b) directly from you when you visit the Website, which may include information you provide to us by means of contact forms, practice journaling, online quizzes or surveys available on the Website;
- c) when you visit the Website by means of cookies;
- d) from third parties, for example if you are a minor and your parents or legal representatives provide us with your data or if you participate in a music class organised by a company.

4. Use of data

Kelsey Hopper Music collects and processes personal information for the following purposes:

- a) customer administration
- b) to provide [products and] services you have requested;
- c) to administrate payment of invoices;
- d) to reply to your queries;
- e) marketing;
- f) administration of the Website;
- g) to enhance our services and the quality thereof;
- h) to conduct our business more efficiently;
- i) to handle disputes.

We will limit the processing of personal data to the minimum necessary to achieve these objectives.

5. Legal basis for processing of personal data

We only process your personal data when we have a lawful ground to do so. In particular, the processing of your personal data is based on the following legal grounds:

- a) processing is necessary for the performance of our contractual obligations (as detailed in purposes a) to c) here above); or
- b) processing is necessary for the purposes of our legitimate interests to ensure the proper administration, management, promotion and protection of our activities [or products] (as detailed in purposes d) to i) here above); or
you provided Kelsey Hopper Music with your explicit consent (in such a case, a consent

form will be addressed to you separately, clearly spelling out the reasons of the processing).

6. Transfer of your personal data

In the context of the purposes as listed above, we may share your personal data with third parties. These are service providers we use, such as IT service providers including WIX, Google (when using hangouts or classroom), Apple (when using facetime), Facebook (when using Whatsapp or [facebook.com](https://www.facebook.com)), Microsoft (when using skype) or marketing agencies.

We will ensure that, where relevant, contractual safeguards are implemented to ensure the protection of your personal data when disclosing your personal data to a third party. For example, we will enter into data processing agreements with relevant parties (providing for restrictions on the use of your personal data and obligations with respect to the protection and security of your personal data).

7. Storage period

The information will be kept up to date and not retained for longer than necessary in relation to the above specified purposes. More specifically, Kelsey Hopper Music will retain your personal data for **•please indicate**. Afterwards, your personal data will be erased or anonymised, unless a longer storage period is required by law, or unless your personal data are still necessary in the context of the establishment, exercise or defence of a legal claim.

8. Security

Kelsey Hopper Music will protect your personal data by using appropriate security safeguards.

Kelsey Hopper Music takes all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. Kelsey Hopper Music takes every precaution to protect all information received from our you against unauthorised access and use.

Further, we seek to ensure that we keep your personal data accurate and up to date. In view thereof, we kindly request you to inform us of any changes to your personal data (such as a change in your contact details).

All personal data received will be treated as confidential and only be used for Kelsey Hopper Music purposes.

9. Access and modification of the collected information

You have the statutory right to access the personal data held about you at any time and to correct any inaccuracies, erase or block your personal data.

You may exercise your right to data portability, within the limits set in the Data Protection Laws. You may also object to or request restriction of the processing in accordance with and within the limits set in the Data Protection Laws.

When the processing of your personal data is based on your consent, you also have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Please note that you also have the right to lodge a complaint with the competent supervisory authority in case you consider that we have infringed data protection laws (in Luxembourg, the *Commission Nationale pour la Protection des Données*).

For further clarifications, please contact us at Kelseyhopperservices@gmail.com.

10. Use of Cookies

The Website uses cookies to enhance your user experience. Please see our [Cookie Policy](#) for more information.

11. Changes to the Privacy Policy

Any changes Kelsey Hopper Music makes to the Privacy Policy in the future will be posted on this page and, where appropriate, may be notified to you per e-mail. You should visit this page periodically to review any changes to the Privacy Policy. If you would like Kelsey Hopper Music to send you a copy of the most recent version of this Privacy Policy, please contact us at Kelseyhopperservices@gmail.com.

12. Contact

If you have any questions, comments or requests about this Privacy Policy or about this Website, please contact us at Kelseyhopperservices@gmail.com.

13. Law & Jurisdiction

This Privacy Policy and the content of this Website, shall be governed by and interpreted in accordance with the laws of the Grand-Duchy of Luxembourg and you irrevocably submit to the sole jurisdiction of the courts of the Grand-Duchy of Luxembourg.