

The Menuhin Foundation Privacy and Data Protection Policy

Revision History

Version No.	Revision Date	Summary of Changes	Changes created by
V0.1	06 December 2024	New Privacy and Data Protection Policy and Procedures	Drafted by Compliance Officer Approved by Chairperson

1. Purpose

The Menuhin Foundation is committed to protecting the privacy and personal data of its donors, volunteers, beneficiaries, students and stakeholders in compliance with the **Personal Information Protection Act 2016 (PIPA)** of Bermuda. This policy outlines how we collect, use, store, and protect personal information.

2. Scope

This policy applies to all employees, volunteers, contractors, and third-party service providers who handle personal data on behalf of The Menuhin Foundation.

3. Definitions

- **Personal Information:** Any data relating to an identifiable individual, such as names, contact information, financial details, and preferences.
- **Sensitive Personal Information:** Ethnic origin, sex
- **Data Subject:** The individual to whom the personal information relates.
- **Processing:** Any operation performed on personal data, including collection, storage, use, sharing, or deletion.

4. Collection and Use of Personal Information

We collect personal information only for legitimate purposes related to our mission, including:

- Student management and communication
- Administering events and activities
- Communications with supporters and beneficiaries.
- Demographics reporting supporting donations, grants, and fundraising solicitations
- Compliance with legal and regulatory requirements.

Personal information collected may include:

- Name, contact details (address, email, phone number)
- Employment and professional details
- Financial information (related to bursary and fees)



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5. Data Minimization

We will only collect personal information that is relevant and limited to the purposes outlined above.

6. Consent

Where applicable, the Foundation will obtain explicit consent from individuals before collecting, using, or sharing their personal information. Individuals may withdraw their consent at any time.

7. Data Storage and Security

- Personal information will be stored securely using physical and electronic safeguards.
- Access to personal data is restricted to authorized personnel only.
- The Menuhin Foundation will implement appropriate encryption, access controls, firewalls, and regular security audits to protect electronic records.

8. Data Retention

Personal information will be retained only for as long as necessary to fulfill the purposes for which it was collected or to comply with legal obligations.

9. Sharing of Personal Information

Personal information may be shared with third parties, including service providers and regulatory bodies, where necessary for the Foundation's operations and legal obligations. These third parties will be required to safeguard the personal information according to PIPA standards.

10. Data Subject Rights

Under PIPA, data subjects have the following rights:

- **Right to Access:** Individuals may request access to their personal information held by the Menuhin Foundation.
- **Right to Correction:** Individuals can request the correction of inaccurate or incomplete personal information.
- **Right to Erasure:** Individuals may request the deletion of their personal information under certain circumstances.
- **Right to Object:** Individuals have the right to object to the processing of their personal information based on legitimate interests.
- **Right to Restriction:** Individuals can request a restriction on the processing of their personal information in certain situations.

Requests to exercise any of these rights must be made in writing to the Foundation's designated Privacy Officer (contact information below).

11. Breach Notification

In the event of a data breach, affected individuals and the Privacy Commissioner will be notified as required under PIPA.



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12. Policy Review

This policy will be reviewed annually or as required to ensure ongoing compliance with PIPA and reflect changes in operations or relevant legislation.

13. Contact Information

For questions, concerns, or requests regarding personal information, please contact:

The Menuhin Foundation Privacy Officer

The Menuhin Foundation, Address: PO Box HM 2814, Hamilton HM LX

The Menuhin Foundation Email address: trustees@menuhin.bm

The Menuhin Foundation telephone number: 441-295-4093

14. Acknowledgment

By interacting with The Menuhin Foundation, individuals acknowledge and agree to this Privacy and Data Protection Policy.