

## **GDPR**

I have registered with the ICO as a sole trader with tradenames Intermision Records and vintagedrummer.co.uk.

With regards to the activity of contacting radio stations for the specific purpose of song plugging, this statement details my GDPR-compliant strategy for the process of informing radio stations of an artistic, music release.

To facilitate proper conduct for this activity, I site the *legitimate interest* clause.

I have based this decision in good faith that it is a commonly held understanding that radio stations provide a contact email for the purpose of the general public (me) making contact as a programme content-contributor. For this purpose, I suppose that that Non-Verbal Reasoning (N-VR) is both an artist and an interested member of the public [a listener/service user] and that by sharing the rich-content of a musical composition, that this constitutes legitimate interest and proper use of the contact details provided on the grounds that radio stations play recorded music as part of their programming schedule and provide information in the public interest “news” including articles on new music and artists.

Furthermore, unless unintentionally, entirely by mistake, or by way of some unknown email forwarding protocol that has been set up by the receiver or their IT administrator, N-VR does not knowingly distribute emails to specific individuals for the purpose of radio plugging, nor does it store or process the email or personal details (including name or job title) of any radio station personnel. For the sake of clarity: I attempt to send emails exclusively (but not exhaustively) to *info@domain, studio@domain, enquiries@domain, office@domain* etc. referred to colloquially as, “general” email address, or, to email address’ provided specifically for the purpose of submitting new releases and supporting promotional material. It is my assumption that these email address’ have been made publicly available for the purpose of *general enquiries*, of which, the initial and one-time approach per song-release is such an instance. One-time by definition means that I will not intentionally or knowingly make repeated attempts to contact the same address/recipient with the same content. In the eventuality that an individual responds via the generic email address or, uses another email address to contact me back, I will do my utmost to adhere to current best-practice GDPR guidance and where appropriate, seek consent to continue communication with them desisting at any point upon request.

At the present moment, the *Vintage Drummer* portion of this website / enterprise has not yet contacted prospective clients nor has it processed any enquires from a third party. I propose to hold this notice on this domain because Intermision Records (and artist N-VR) does not currently have a live website. I will provide a link to this notice at the bottom of outgoing emails from any email address managed by me for the use for radio plugging.

Prior to engaging in any other business activity beyond the scope of radio plugging, I will update this statement to cover an appropriate procedure for the proper handing, storage and deletion of client contact information and data.

If a website goes live for Intermision Records, or Intermision Records LTD in the future, I will be sure to transfer or publish a revised appropriate GDPR statement.

This statement is made without legal advice and in good faith that I have understood and done my utmost to act in a lawful and respectful way and that I hope to be given the opportunity to formally apologise to anyone who feels they have been contacted incorrectly, or who does not wish to receive enquires about new music. I would first offer to rectify the problem with immediate deletion of their contact information held on any/all devices.

I will review this statement periodically every year prompted by the renewal of the ICO fee, and immediately upon updated business practices or data management systems which affect the handing of personal data.

Dec 2021