



## **Limehouse Yoga Ltd. and Limehouse Retreats Ltd.**

### **Data Protection Policy**

#### **Introduction**

Limehouse Yoga Ltd. and Limehouse Retreats Ltd. (hitherto referred to as Limehouse Yoga & Limehouse Retreats) regards the lawful and correct processing of personal and special category data as an integral part of its purpose. Limehouse Yoga & Limehouse Retreats believes this is vital for maintaining the confidence of customers, employees and other stakeholders about whom we process data.

#### **Policy Statement**

This Data Protection Policy explains how Limehouse Yoga will meet its legal obligations concerning confidentiality and data security standards. The requirements within the policy are primarily based upon the EU General Data Protection Regulation (EU GDPR), which is the key piece of legislation covering data security and confidentiality of personal and sensitive personal data in the European Union.

- Limehouse Yoga & Limehouse Retreats will fully implement all aspects of the EU GDPR.
- Limehouse Yoga & Limehouse Retreats will ensure all employees and others handling personal data are aware of their obligations and rights under the EU GDPR.
- Limehouse Yoga & Limehouse Retreats will implement adequate and appropriate physical and technical measures and organisational measures to ensure the security of all data contained in or handled by its systems.

The focus of this policy is to provide guidance about the protection, sharing and disclosure of your personal data, but it is important to stress that maintaining confidentiality and adhering to data protection legislation applies to anyone handling personal data or personal sensitive data on behalf of Limehouse Yoga & Limehouse Retreats.

#### **What data do we collect?**

Limehouse Yoga & Limehouse Retreats collect, store and process personal data about our students, trainee teachers, staff and third party contractors. We also collect, store and process special category data (see definition below) about our students and trainee teachers in order to ensure their safe attendance at Limehouse Yoga & Limehouse Retreats

**Personal Data** is any information which can identify an individual. For Limehouse Yoga and Limehouse Retreats this will include data such as name, address, phone number, credit/debit card information and class attendance.

**Special Category Data** data is considered to be any information about an individual's:

- race;
- ethnic origin;
- politics;
- religion;
- trade union membership;
- genetics;
- biometrics (where used for ID purposes);
- health;
- sex life; or
- sexual orientation.

Limehouse Yoga and Limehouse Retreats will only collect special category data concerning student and trainee teacher physical and mental health in order to ensure their safe attendance at our classes, retreats, workshops and teacher training days.

### **Under 16's**

All data collected from people under the age of 16 (unless there are concerns about mental capacity in which case this should be extended) will be treated as special category data.

### **Seeking your consent**

Limehouse Yoga & Limehouse Retreats will always seek your consent to collect, store, process or share your personal and special category data. In exceptional circumstances, we may share your data with third parties without your consent, but only where a specific exemption allows us to do so. These exemptions include:

- national security;
- defence;
- public security;
- the prevention, investigation, detection or prosecution of criminal offences;
- other important public interests, in particular economic or financial interests, including budgetary and taxation matters, public health and security;
- the protection of judicial independence and proceedings;
- breaches of ethics in regulated professions;

- monitoring, inspection or regulatory functions connected to the exercise of official authority regarding security, defence, other important public interests or crime/ethics prevention;
- the protection of the individual, or the rights and freedoms of others; or
- the enforcement of civil law matters.

## **Data Protection Principles**

The eight Data Protection principles that lie at the heart of the EU GDPR give the Regulation its strength and purpose. Limehouse Yoga and Limehouse Retreats fully endorses and abides by the principles of data protection. The principles require that:

- We process your data lawfully, fairly and in a transparent manner
- We collect your data for specified, explicit and legitimate purposes and that we do not use your data for any other purpose we haven't told you about.
- We only collect data which is adequate, relevant and limited to what is necessary in relation to the purposes for which we collected it.
- We make sure the data we hold about you is accurate and, where necessary, kept up to date, and that inaccurate data is amended or erased.
- We do not keep your data for longer than is necessary and
- We process your data in a manner that ensures that it is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## **What is a record?**

A record can be in electronic and/or in a physical format. It may include such documentation as:

- Manually stored paper files e.g. membership records, employee records
- Hand written notes
- Letters to and from Limehouse Yoga & Limehouse Retreats
- Electronic records
- Printouts
- Photographs
- Videos and tape recordings

## **Your rights**

You have the right to ask us to amend your data if you think it is inaccurate. You also have the right to ask us to stop using your data if you no longer wish us to do so. If you ask us to stop using your data, we may still have to keep it for a period of time in line with our retention policy.

The EU GDPR also gives you (or someone authorised by you) the right to apply for access to the personal data we hold about you. This is called a Subject Access Request and you can get more information about this on the Information Commissioners Website at <https://ico.org.uk/for-the-public/personal-information/> .

If you would like to access the data we hold about you, have it amended or ask us to stop using it then please speak to any of our staff who will be able to help you.

### **What do we use your data for?**

Limehouse Yoga and Limehouse Retreats use your data to:

- Allow us to conduct our business (i.e. run classes, retreats, workshops and teacher training days).
- Ensure your safe attendance at Limehouse Yoga and Limehouse Retreats.
- Process payments for purchases you have made
- Analyse class, workshop and retreat attendance and make decisions about future classes, workshops and retreats.
- Send you marketing information from Limehouse Yoga and Limehouse Retreats **but only where you have specifically consented to this.**

### **Who has access to the data we hold about you?**

Limehouse Yoga and Limehouse Retreats may share your data with the following parties:

- Staff employed by Limehouse Yoga and Limehouse Retreats
- Teachers who work for us but are not employed by us
- Trainee teachers
- Third party contractors who work for us but are not employed by us (for example self-employed office staff).
- Third parties who store or process data on our behalf (for example companies whose computer software we use.

We will only share data with any of the above in order to ensure your safe attendance and Limehouse Yoga and Limehouse Retreats, or to process payments for purchases you have made.

We will never share your data with any third party for the purposes of marketing to you.

### **How do Limehouse Yoga and Limehouse Retreats make sure your data is kept safe?**

- Limehouse Yoga and Limehouse Retreats will require any individual who teaches at any of our classes, workshops or retreats to sign a contract which commits them to processing your data fairly and lawfully and in line with this policy.

- Limehouse Yoga and Limehouse Retreats will require any third party who processes data on our behalf to sign a contract which commits them to processing your data fairly and lawfully and in line with this policy.
- Where Limehouse Yoga and Limehouse Retreats uses companies based in the European Union, these will already be bound by EU Data Protection laws.
- Where Limehouse Yoga and Limehouse Retreats use companies based in the United States of America we will endeavor to ensure these are covered by the Privacy Shield Framework.
- Where Limehouse Yoga and Limehouse retreats use companies which are not based in the EU and are not covered by the Privacy Shield Framework we will ensure that the company can provide an adequate level of protection for individuals and their personal data.

### **Breach of Policy**

Limehouse Yoga and Limehouse Retreats are committed to protecting your data. However, should a data breach occur we will take steps in line with the Information Commissioners guidance, including where necessary: -

- Reporting breaches to the Information Commissioners Office (within 72 hours where feasible).
- If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, we will also inform those individuals without undue delay.
- ensuring we have robust breach detection, investigation and internal reporting procedures in place. This will facilitate decision-making about whether or not we need to notify the relevant supervisory authority and the affected individuals.
- We will keep a record of any personal data breaches, regardless of whether we are required to notify.

Where we become aware of a data breach committed by any third party processor we will take immediate steps to work with them to undertake the above steps.

If you become aware that your or someone else's data may have been compromised by Limehouse Yoga or Limehouse Retreats please contact us as soon as possible so that we can investigate and rectify the situation. You can also contact the [Information Commissioners Office](#) for help and advice.

## **Glossary of Terms**

### **Data Subject**

An individual who is the subject of personal data or sensitive personal data. This includes employees, students, teachers and trainee teachers.

### **Data Controller**

A person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data and sensitive personal data are, or are to be processed.

The data controllers are Limehouse Yoga Ltd. and Limehouse Retreats Ltd.

### **Data Processor**

In relation to personal data or sensitive personal data, this refers to any person who processes that data on behalf of the data controller but it is not employed by them.

### **Third Party**

In relation to personal data or sensitive personal data, this refers to any person other than the data subject, the data controller, or any data processor or other person authorised to process data for data controller or processor. For example, the Police or HMRC.

### **Processing**

Recording or holding data or carrying out any operations on that data including organising, altering or adapting it; disclosing the data or aligning, combining, blocking or erasing it.

### **Data Extractor**

The person who takes data from a data source, such as a database, which may then be used for further activity. For example, an employee querying the database to send a marketing email.

### **Data Breach**

A failure leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data or sensitive personal data.

### **Subject Access Request**

A written, signed request (which includes email and other written formats) from an individual to see data which Limehouse Yoga or Limehouse Retreats holds about them. The Data Controller must provide all such information in a readable form within 1 month of receipt of the request.

**This policy is effective from 25<sup>th</sup> May 2018 and will be reviewed annually or when legislation changes.**