

## **PRIVACY POLICY UPDATED AT 25 MAY 2018 GDPR**

Aditya is committed to protecting your privacy.

We promise that we will only use your data for legitimate purposes and will never give or sell your details to anyone – unless you gave us explicit permission , or we are legally required to do so. You have a right to see any personal information, which we hold about you, on written request.

### **Responsibility for Data Protection**

Alessandra Pecorella, founder and Director of Aditya Yoga School, is appointed to deal with Data Protection Compliance and any related requests and enquiries.

All communication shall be addressed to

[alessandra@adityayogaschool.co.uk](mailto:alessandra@adityayogaschool.co.uk)

### **Why the School needs to process Personal Data**

Aditya has a contractual necessity to keep a student's contact details and a legitimate interest to email them information e.g. a newsletter or information about a workshop which they may be interested in. However, you will not receive marketing emails particularly if you are no longer a student of the School, unless you have given your consent for this.

When you sign up for courses at Aditya You can choose the give your consent to your information being stored and used for marketing purposes or opt out.

The form to join courses can be found at [adityayogaschool.co.uk/application-form/](http://adityayogaschool.co.uk/application-form/).

The Online Application Form and Applications received via email are the main way that Aditya uses to gather students and prospect students data.

Keeping students data is necessary for:

- The purposes of students selection;
- Maintaining relationships with alumni and the school community, including direct marketing and fundraising for Charity purposes;
- To make use of photographic images of the students on the School website or on promo material ( printed Flyers, online events ) and where appropriate on Social Media;
- For Security Purposes;
- For Legal and Regulatory purposes (for example monitoring Health and Safety) and to comply with its legal obligations.

### **Types of Personal Data Processed by the School**

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- information about the individual's health and contact details for their next of Kin;
- images of students engaging in School's activities.

## **How the School Collects Data**

Generally Aditya receives personal from the individual directly. This may be via the online Application Form on the Aditya website or simply in the ordinary course of interaction or communication (such as emails or via Messages – as in Social Media interaction).

## **Who has access to Personal Data and who the School shares it with**

Occasionally the School will have to share personal information relating to its community with third parties, such as professional advisers ( lawyers, accountants, insurers) or government authorities and regulators).

For the most part, personal data collected by Aditya will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols ( i.e. on a “need to know” basis).

## **How long we keep personal data**

Aditya will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Aditya will retain the documents and data relevant to each students for at least 7 years following departure from the School.

## **Keeping in touch and supporting the School.**

Occasionally Aditya will use the contact details of the students and other members of the community, to keep them updated about the activities of the School, or alumni, including sending updates via newsletter and email.

Should you wish to object to any such use please contact Alessandra via email at

[alessandra@adityayogaschool.co.uk](mailto:alessandra@adityayogaschool.co.uk).

## **Your Rights**

Individuals have various rights under Data Protection Law to access personal data and in some cases ask for it to be erased and amended. Any individual wishing to access or amend their personal data should put their request in writing to [alessandra@adityayogaschool.co.uk](mailto:alessandra@adityayogaschool.co.uk).

Aditya will endeavour to respond to any written request as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of request to access information.

## **Consent**

Where Aditya is relying on Consent as a means to process personal data, any person may withdraw this consent at any time.

Please be aware that the School may not be relying on consent but have another lawful reason to process the personal data in question even without your consent. That reason

will have usually been asserted under this Privacy Notice, or may otherwise exist under some form of Contract agreement with the individual.

### **Data Accuracy and Security**

Aditya will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify Alessandra Pecorella of any changes of important information.

An individual has the right to request that any out-of-date , irrelevant or inaccurate information about them is erased or corrected ( subject to certain expectations and limitations under the Data Protection Law) please see above for details of why the School may need to process your data or you you may contact if you disagree.

### **This Policy**

Aditya will update this Privacy Notice from time to time. Any substantial changes that affect your right will be provided to you directly as far as is reasonably practicable.

### **Queries and Complaints**

Any comments and queries on this policy should be directed to Aditya's founder Alessandra Pecorella via email

[alessandra@adityayogaschool.co.uk](mailto:alessandra@adityayogaschool.co.uk).

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School Complaints/ Grievance procedure and should also notify Aditya's Founder Alessandra Pecorella via email at the same address as above.

You can also make a referral to or lodge a complaint with the Information Commissioner's Office ( ICO), although the ICO recommends that steps are taken to resolve the matter before involving the Regulator.

LONDON 25<sup>th</sup> May 2018

## Appendix 1

### **Lawful Basis (Legal Reasons) for Processing Information**

1. Contractual necessity – you need to process someone’s personal data to perform a contract you have with them, e.g. where you have a contract with a student to provide a product or service (yoga teacher training YTT).
2. Legitimate interest – where you are a private sector organisation and you have a genuine and legitimate interest (can include commercial), so long as this is not outweighed by harm to an individual’s rights. When for example asking for health questionnaires to be completed, Aditya has a legitimate interest to protect the student during a class/ event/ training and make necessary adjustments to meet their needs.
3. Consent – your students have consented to data processing in the application form, which allows them to tick a box to confirm that they are happy for Aditya to store their data.
4. Vital interests – it is necessary to protect someone’s life.
5. Legal obligation – the need to process an individual’s data because the organisation has to comply with legal obligation under UK or EU law – not applicable to yoga teachers
6. Official function – you need to process data in order to carry out an official function or task which is in the public interest and you have a basis for proceeding under UK law. This is not relevant to teachers and applies to public bodies.