

TRUE YOGA: DATA PROTECTION POLICY

- 1 In order to fulfil its functions True Yoga and individual members of the organisation are likely to collect and store personal data about members, students, case studies, enquiries and event attendees either in hard copy or electronically.
- 2 For 2018 GDPR update see also: True Yoga Consent and Privacy Policy 2018
- 3 True Yoga is committed to the lawful treatment of all data collected and used in fulfilment of its aims and objectives.
- 4 Similarly True Yoga expects all individuals registered as students, members, volunteers or staff with the organisation to comply with any legal requirement as set out in the Data Protection Act 2018, and any subsequent legislation that is applicable.
- 5 It is the individual member's responsibility to be aware of and comply with any existing legislation.
- 6 This Policy is not intended to set out exhaustively the duties of the organisation or its members. Further information about the 2018 Data Protection Act can be found at the Office of the Information Commissioner <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/whats-new/>

I Principles

The Data Protection Act 2018 states that any data held must be:

- 1 Fairly, lawfully and transparently processed
- 2 Purpose limitation: processed for limited purposes
- 3 Adequate, relevant and not excessive: data minimisation
- 4 Accurate, and kept up-to-date
- 5 Storage limitation: Not kept longer than necessary
- 6 Rights: Processed in accordance with the data subject's rights
- 7 Confidentiality and Integrity: Secure
- 8 Accountability
- 9 Not transferred to countries outside the European Economic Area without adequate protection being provided to the personal data on individual subjects

II Use of Personal Data

- 1 True Yoga will use personal data in order to:
 - (i) provide and maintain a list of members and teachers to the public
 - (ii) process and respond to requests, enquiries and complaints received from members and the public
 - (iii) provide services and training
 - (iv) communicate with its members
 - (v) analyse trends and profiles and compile statistics
 - (vi) prevent or detect fraud
 - (vii) enable third parties to carry out any of the above on its behalf
 - (viii) pursue any other legitimate activity in line with its objectives

- 2 Individual members may keep personal data about their students for the above reasons and in order to:
 - (i) Provide an accurate record of any meetings held with a student
 - (ii) Provide records of practices given
 - (iii) Provide a record of any medical conditions or disabilities that would influence the practices given
 - (iv) This list is not exhaustive and it is the responsibility of the individual member to ensure that the information is processed in line with current legislation.

- 3 Case studies which are kept digitally and form part of a student's coursework, may, where anonymised, be held by students and shared with the Course Tutor for the purpose of fulfilling the course.

III Consent

- 1 True Yoga and its members will seek consent to process any personal data when a member registers with the organisation.

- 2 Similarly, any member working with an individual student will seek their written consent to store personal data about them.

IV Storage

- 1 True Yoga will take all reasonable steps to limit the unlawful use or accidental loss of any data held.

- 2 True Yoga expects that individual members will also take all reasonable steps to keep personal data secure and held in line with this policy and current legislation.

V Sharing of data

Data will only be shared with third parties by True Yoga where:

- (i) consent has been obtained from the individual, or
- (ii) where the organisation is legally bound to do so, or
- (iii) where it is in the public interest to do so.

VI Access

- 1 Any individual wishing to access the information held about them by True Yoga may do so by applying in writing to True Yoga.

- 2 Any records held about the individual will be made available in photocopied format within 40 working days of the application's receipt.

- 3 Proof of identity will be required.

Any application by a student to an individual member must be made to that person as independent Data Controller.

VII Amendment to Data held

- 1 Where an individual believes information held about them by True Yoga is incorrect they should request that it be amended by applying in writing to True Yoga.
- 2 Where a student wishes to see their records corrected by an individual teacher they should make the request of the teacher in the first instance. If matters cannot be satisfactorily resolved then they should bring this to the attention of the British Council of Yoga Therapy, the Complementary and Health Care Council or the British Wheel of Yoga.
- 3 True Yoga should also be notified.
- 4 Where there is any disagreement as to correction of the information held it is open to the organisation to note the changes requested made but not correct them.
- 5 Where an individual wants the data held on them deleted, they should request that it be done so by applying in writing to True Yoga.

VIII Breach of Obligations

- 1 Where an individual believes that there has been a breach of the organisation's duty in connection with the processing of their personal data by True Yoga they should address this as a complaint to the Course Director in line with the Complaints Policy (see www.trueyoga.co.uk/policies).
- 2 Where an individual student alleges a breach of the above obligations by their teacher who is a member of True Yoga they should make a complaint in line with the Complaints Policy as detailed in 1 above.

IX Data Controller

- 1 True Yoga is the Data Controller for the purposes of this policy and as such is registered with ICO: **ZA175439**
- 2 Where individual members hold information about their students it is their responsibility to determine if they are the Data Controller in line with current legislation.
- 3 See also True Yoga Consent and Privacy Policy 2018 (www.trueyoga.co.uk/policies)