

Introduction

Welcome to Awaken with Yoga's privacy policy.

Purpose of this privacy policy

Awaken with Yoga respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This website is not intended for anyone under the age of 18 however parents (or anyone with parental responsibility for someone under 18) can contact Awaken with Yoga on behalf of their child. We do not knowingly collect data relating to anyone under 18 unless it is provided by a parent or someone with parental responsibility.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

If needed please use the Glossary at the bottom of this privacy policy to understand the meaning of some of the terms used.

1. Who we are

We are Awaken with Yoga, a school providing yoga classes, one to one sessions, workshops, and related events to students.

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Email: daisypye@talktalk.net

Contact form: on this website under the "Contact me" section

Phone: 01536 724113

Via our Facebook page: <https://www.facebook.com/awakenwithyogarushdenhighamferrers/>

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 24th January 2019.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use and store different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name
- **Contact Data** includes home address, email address, mobile and land line telephone numbers, emergency contact phone number.

- **Financial Data** includes bank account number and sort code (if you choose to pay us by cheque or online banking).
- **Transaction Data** includes details about payments from you and other details of services you have purchased from us.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences, and how you came to find out about us.

We do not collect any **Special Categories of Personal Data** about you other than basic details about your health which consists of information submitted in relation to a few brief questions via your Induction form on commencement of classes, and details of your occupation simply because this often highlights why you may have certain health issues, for example, if your occupation is mainly deskbound (**Health Data**). This information is for no other reason other than to ensure your health and safety and so that we can advise you how yoga may benefit you personally.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with information on yoga, yoga related services we provide and how you may be able to benefit from doing yoga. In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you. This is normally via direct interaction with you when you contact us to enquire about our services, and the ongoing provision of our services to you as follows:

- After you have completed the Induction form on joining classes
- Via the Contact Form on this website
- Via our Facebook page
- Via phone
- Via email
- During classes

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data (other than your Health Data). If you withdraw your consent to us processing your Health Data, this may limit our ability to provide our services to you (as we may not be able to provide guidance related to your health and safety for the purposes of our classes, or be able to advise you as to how you may benefit from yoga).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To deliver services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Notify you about changes to our services, such as change of time, venue and class cancellations due to weather or unforeseen circumstances	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To ensure your health and safety during classes, workshops and events and so that we can advise you how yoga may benefit you personally	a) Health Data	Consent
To administer and protect our business and this website	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business) (b) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our business)

Marketing

We may use your Identity Data and Contact Data to send information to you on our services, such as yoga related events and workshops, monthly mailshots, articles and news that we think may be of interest to you.

You will receive marketing communications from us if you have requested information from us or have

been, or are, a student of the yoga school or have purchased services from us and you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time by contacting us using any of the methods referred to in section 1 above.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us that we need to use to inform you about regular class information should you be a current student.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We do not share or sell your personal data with third parties

6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

7. Data security

We have put in place appropriate security measures to protect your personal data. In the event of a suspected personal data breach we will notify you as soon as possible.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for regulatory purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact Awaken with Yoga.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.