

AbaYoga

Privacy & Data Protection Policy



Introduction

This Privacy & Data Protection Policy outlines the procedures of AbaYoga in relation to the collecting, storing and use of personal data belonging to all students who have attended, attend at present and will attend in future any of the appointments as part of my AbaYoga's service offerings including Group and Private Yoga Classes, Yoga Therapy and Relaxation coaching.

This is to comply with the new General Data Protection Regulation (GDPR), which mean you'll have more control over how personal data concerning you is used from May 25th 2018.

At AbaYoga, depending on how much you told us when you joined, we store your:

- 1) Name
- 2) Email address
- 3) Date of birth
- 4) Home Address
- 5) How you heard about us
- 6) Mobile Phone
- 7) Profession
- 8) How long you've done Yoga
- 9) Any listed injuries
- 10) If you are pregnant

We store all this safely using a secure Google business platform with a 2 step verification password protection system.

We store your email address and name with Mailchimp, also password protected. This is used to send you occasional newsletters and class information, which is something you opted in to when you signed up but you can unsubscribe yourself from this anytime you wish by pressing the unsubscribe button on any of our newsletters or by sending your request to in writing to chris@abaYoga.co.uk.

We also use a US based class booking & payments platform called Mindbody to administer your classes. Mindbody drives the app you use on your phone to make your AbaYoga bookings. YOU REMAIN IN COMPLETE, EDITABLE CONTROL of the data you chose to input when creating your AbaYoga account with Mindabody. The settings options enable you to switch on and off your contact preferences anytime.

Most importantly, AbaYoga will NEVER sell your data to any 3rd parties.

Why do we keep your data?

1 Contractual necessity – we need to process your personal data to perform the contract that we have together and deliver the service provided to you by AbaYoga. Most importantly, but not restricted to, class booking administration & information updates regarding your Yoga development with AbaYoga.

2 Legitimate interests – this includes commercial compliance interests in your data, so long as this is not outweighed by harm to your individual rights, including complying with any necessary procedures as required by HMRC or by our Professional Indemnity & Liability Insurance Providers (currently Markel Direct, a £3.9b company quoted on the New York Stock exchange since 1986).

What are your rights?

Under the new General Data Protection Regulations you retain the following rights over the collection, storing and use of your Personal Data:

Your right to erasure: not to mistaken with an “absolute right to be forgotten” this right enables you to request for some or all of your personal data to be erased and to prevent processing. Your reasons for using this right may include

- 1) Your personal data is no longer necessary for the purpose for which it was originally collected.
- 2) You want to withdraw consent.
- 3) You want to object to the processing of your personal data.
- 4) Your data was unlawfully acquired or processed.
- 5) You have to comply with a legal obligation.

If you want to request the erasure of your data please do so in writing to chris@abaYoga.co.uk. Upon receipt I'll examine the reasons and probably delete anything you want to erase with in 10 working days. The only circumstances that might lead to my appealing this are:

- 1) To comply with a legal obligation or in the public interest or the exercise of official authority. The current legal obligations imposed to our business derive from HMRC and our Professional Insurance Liability providers.
- 2) For public health purposes.
- 3) In the exercise or defiance of legal claims.

Your rights continued...

Your right to data portability: This gives you the right to request and reuse your Personal Data for your own purpose across different services. Please make all requests in writing to chris@abaYoga.co.uk.

The right of access: this gives you the right to request to see the personal data that is being held by AbaYoga . This request must also be made in writing to chris@abaYoga.co.uk. We will take no more than one calendar month to collate, prepare and provide the information requested. You also have the right to request a correction if, upon receiving your data you notice inaccuracies or mistakes. Of course you'll still need my agreed participation to correct the data I store about you. In the unlikely event that there is any disagreement about what should be properly stored as clean information this will be duly noted.

The Policy

- 1) All personal data remains the property of the original client. AbaYoga will never own said data and will only ever store it for the purposes of providing the service requested as detailed above.
- 2) I, Chris Abay, am the only person who has access to and looks after your data within AbaYoga.
- 3) It is my commitment to safely look after your data whilst it is in my possession.
- 4) All data collected is securely stored in web based solutions and electronically accessed via password-protected devices.
- 5) Your data including personal Email addresses are stored electronically on password protected web based business solutions covered by the International data protection shield including Google, Mindbody, Mailchimp and Paypal. To the best of my knowledge these platforms are business-critical secure and have strict policy's to protect your personal data.
- 6) All personal data collected is stored for up to seven years from the date of your last engagement with AbaYoga. This is to comply with HMRC procedures and Professional Insurance Liabilities and also current consumers' policies & procedures regarding personal liability claims.
- 7) After the seven-year period has ended your personal data is destroyed (if in paper format) or deleted from the device and or platform (if in electronic format).
- 8) PERSONAL DATA WILL NOT BE SHARED WITH ANY THIRD PARTY FOR GENERAL MARKETING PURPOSES.
- 9) Personal data may be shared (under special circumstances) to a third party only for legal or medical reasons and only with your permission. I will only raise any requests we may receive for your data release with your prior consented disclosure.

- 10) In the event of a data breach, I will aim to inform you at the earliest possible opportunity whether any of your personal data has been compromised provided I still have the permission you granted when you opted in to contact you via your personal email address. Breaches in data protection could encompass my accidental loss of your personal information, the illegal hacking of my computer or mobile phone by an external entity, the loss of my computer (password protected), phone or paper files or their illegal misappropriation by anyone external to my business or even an email containing personal data sent to the wrong person.

If a data breach does ever happen I will closely liaise with you and the Information Commissioner's Office (ICO) so that we put in place any mitigating procedures.