**Routed Stillness Ltd Privacy Notice – clients and students**

Published 11th of November 2020. Last updated 11th of November 2020

Routed Stillness Ltd is the data controller and is committed to complying with our legal responsibilities under data protection law. We take your privacy seriously and will ensure your personal information is kept secure.

When we collect, use, share, retain or do anything else with your personal information (known collectively as ‘processing’) we are regulated under the General Data Protection Regulation (GDPR) and are responsible as ‘controller’ of your information.

This Notice applies to you if you are:

* An existing or prospective student or client

It is important that you read this Notice carefully as it contains key information about how we use your personal data and your associated rights.

**About us**

Routed Stillness Ltd is a Limited Company. Our students participate in classes/sessions within Yoga, meditation, crystal healing and spiritual life coaching practices.

Those participating in a session/class are covered under the practitioner’s/teacher’s public liability insurance.

**Information we collect about you**

The categories of personal information we process include:

* Contact details\* (student/client and emergency contacts)
* Date of birth\*
* Gender
* Any relevant medical conditions and/ or disabilities and additional related information
* Other relevant individual needs, eg information about learning or other support needs
* Any individual risk assessments
* Details of any reasonable adjustments or steps taken to support your individual needs
* Attendance and progress records
* Any communications from, to or relating to you
* Details relating to standards of conduct
* Any accident or incident reports including details of injuries
* IP address, browser identifier and the time of access (if you use our website)
* Bank details (If you are making regular payments to us)

It is your choice whether you provide all the information we have requested, but not providing information may affect our ability to meet your needs and to protect your well-being.

**Routed Stillness Ltd purposes for processing information about you**

We use the information we hold about you for a variety of purposes which are outlined below. Data protection law requires us to tell you what our legal reason is for each purpose.

**Contractual purposes**

When you ask us to provide you a service, ie a class or other activities, you buy a product from us we usually need to use information about you to provide this product or service, for example:

* To contact you to confirm arrangements
* To notify you about changes to terms and conditions
* To tell you when it is time to re-register for activities
* To process payments or send you receipts required
* To provide you with the benefits and services to which you have subscribed

We do so because it is necessary for the performance of a contract.

**Legal obligations**

We have a duty of care to ensure it is safe for you to take part in fitness and health related activity and to keep you safe while participating. Some individuals may be at risk of harm from participating in these activities as a result of a pre-existing condition. It is vital that you let us know if there is any reason why taking part in these activities may be unsafe prior to participation. With your agreement, we will review any information you provide and undertake risk assessments in consultation with yourself and any appropriate trained professionals eg medical consultants. When we ask participants to provide relevant health information such as details of medical conditions, medication needs, allergies or injuries, this is because we have a legal obligation.

When you tell us about any special needs such as disabilities or other support information, we may use relevant information to comply with our legal obligations under the Equality Act 2010. We will review any information you have provided to help us identify any actions we can take to support inclusion. We may need to ask you for more information to help us to best meet your or your child’s needs. We will keep a record of any steps we take to support inclusion.

When we retain information about you, even after you are no longer taking part in these activities, this is often because we are required to do so by law, such as records we are required to keep for business and accounting purposes. Sometimes we are also legally obliged to share information about you with third parties. More information is provided below.

**Legitimate interests**

We rely on legitimate interests for the following purposes:

* Responding to communications, concerns or complaints and seeking feedback from you about our services
* We will use the information you provide to respond to any comments or questions you raise and where appropriate to undertake investigations into any complaints or concerns. On occasion, we may contact you to seek your views on the services we provide.
* Holding emergency contact information: When you attend classes, we collect contact details. We also ask you to provide an emergency contact which we will only use in exceptional circumstances if we are unable to contact your primary contact e.g. a partner.
* Maintaining attendance registers, progress records and waiting lists: For health and safety purposes and our records, we need to maintain a register of those in attendance at other activities.
* If there are no places in our classes, we can place you on our waiting list and will contact you using the details you provide to inform you when a place is available.
* Filming for training purposes: On occasion, we may film during activities eg during a session/class for training purposes. Videos taken at training sessions for individual training purposes will not be used for any other purpose without prior consent.
* Photography and filming to promote the business: We may take photos and videos during our sessions, to promote the company on our website, club social media and in communications.
* Please let a member of the team know if you do not wish to be filmed or photographed or do not want your image to be published. While we can usually take steps to prevent you from being photographed or filmed at small club events, please bear in mind that at our large public events, it may be difficult to avoid capturing you in footage. However, we always review all photographs prior to publication, and we will ensure any images of you are deleted.
* If we are filming or taking photos for any other purpose, we will ask for your consent.
* Running and monitoring our company’s website, social media and Wi-Fi: We may monitor how our website is used by tracking the articles that you open and how you move around the site. This will help us to understand what information is most useful and helps to improve the site. We use Google Analytics service.
Your IP address will be logged by our webserver but we would not be able to identify you from this information alone.
* Using CCTV for security and crime detection/prevention: Some centres/studios we operate from have CCTV in place, and this is highlighted to visitors of the Centre with multiple signs around our Centre to clearly inform everyone that this surveillance system is installed and they could be captured on footage obtained by the centres/studios.
* We have carried out a legitimate interest assessment (LIA) to ensure that the above processing is necessary and is carried out in a way that ensures a balance between the centre’s/studio’s interests and your individual interests, rights and freedoms with appropriate safeguards, especially to protect the interest of data subjects. We can provide details of these assessments on request.

o For your privacy, CCTV is not operate in any toilets
o The CCTV is not only in place to guard against vandalism and protect against intruders but to also safeguard participants and practitioners/teachers.
o The CCTV is used to help protect those who enter the facility and practitioners/teachers when it comes to health and safety or to capture footage of any incidents that occur within the facility.
o All footage and data captured is retained for approx 30 days from recording. Any footage archived or kept indefinitely and is reported with a risk assessment, which will explain why the footage has been held and stored securely.
o CCTV footage can only be accessed by a practitioner/teacher
o If any CCTV footage videos or images are requested by the police, Routed Stillness Ltd

has the right to ask for a written request before releasing any material.

o Police will usually view the CCTV footage on the premises and this would not warrant any concerns for the leak of the data.

o Please speak to a teacher/practitioner or email aida.routedstillness@gmail.com if you have any queries regarding the CCTV in operation.

You have a right to object to the use of your information for any purposes we undertake based on legitimate interests. Further information is provided in the section below on individual rights.

**Consent**

We rely on consent in the following circumstances:

* To use your email or telephone numbers for internal marketing purposes
* To take photographs and video at a class/session: With your consent, we may also take photos during training to promote the club on our website, club social media account and in communications.
* When you have given us your consent for your personal information to be used for a particular purpose, you have the right to withdraw this consent at any time by contacting the a member at Routed Stillness Ltd. Your withdrawal of consent will not affect any use of the data that was made before you withdrew your consent.

**Special categories of personal data**

There is a special category of personal data for information that is more sensitive and requires greater protection. Some of the information we process falls into this category (eg health/ medical data or any information you provide to us about a disability or your religion, race or gender identity). It is unlawful for organisations to process this type of information unless an additional legal condition applies. We will only process this type of information if one of the following applies:

* You have given your explicit consent or have made this information public
* We are required to do so to establish, exercise or defend a legal claim
* We are required to do so to comply with employment or social security or social protection law
* There is a substantial public interest in doing so
* It is in your vital interests and you are unable to provide consent eg if you are unconscious or do not have sufficient mental capacity

**Marketing**

We will send you by email our Routed Stillness newsletter

By becoming a Routed Stillness Ltd student you have agreed and consented to receive information, newsletters and other information from Routed Stillness Ltd about our activities, services and products that we think might be of interest to you based on your age, interests and experience.

You can ask us to stop sending you this information at any point by emailing aida.routedstillnes@gmail.com; however please be aware that this mean you will not receive any updates on class changes, closures or other important information.

Routed Stillness Ltd does not share your details for external marketing purposes or with third parties without your consent.

**Why we share information about you**

We may also be required to share your personal information in the following reasons:

* Complying with legal and/ or regulatory responsibilities.
* We may be required to share information with bodies such as Her Majesty’s Revenue & Customs (HMRC), Health & Safety Executive (HSE), Police and Information Commissioner’s Office (ICO). Any information that is shared will be strictly limited to what is required to ensure you are protected from harm and will be carried out in accordance with the law and relevant government guidance.
* Following the COVID-19 pandemic, we now have a responsibility to keep a record (for 21 days) of names, dates and times of entry and exit for everyone who enters the Centre/studio and their contact details and to assist NHS Test and Trace by providing that data if requested. We are confident that our normal procedures for staff and members will enable us to do so. We will support NHS Test & Trace, although you can choose to opt out if they wish. Should such a request be received from NHS Test & Trace, we will email you in the relevant class to inform them of the request and give a 24-hour opt-out period. We will not share information with NHS Test & Trace for those who opt-out.
* Insurance
* Obtaining legal or professional advice
* Obtaining a service from a third party

All service providers are contractually required to ensure your information is secure and cannot use this information for their own purposes. Where we are required to share information with them to provide the service, we only disclose information that is strictly necessary to deliver the service.

Except for the above, will only share your information with any other third parties with your prior agreement.

**Individual rights**

You have important rights under data protection law. In summary these include:

* To be informed about how your information is processed (set out above)
* To access any personal data held about you

You have the right to access the personal information we hold about you. You can also request a copy of any other information we hold by emailing us at aida.routedstillnes@gmail.com

* To have your data rectified if it is inaccurate
* If you think that any of the information we hold is inaccurate, you can ask that corrections are made. We will either make the requested amendments or provide an explanation as to why we are not making changes
* To have your data deleted (except if there is a valid lawful reason to retain it)
If you want cease to have a relationship with the us, we will delete any information you provided within two years except for any financial/ accounting records which need to be retained for six years in line with UK tax law. Additional information that has been provided solely for the purpose of participating in a specific activity will be deleted after the event.
* Video footage that has only been taken for training purposes will be retained only for as long as it is required for that purpose and in most cases, will be deleted if no longer required.
* Photographs and other video footage captured for promotional purposes will be retained for as long as required (as stated in ‘Photography and filming to promote the club’ section). After this point, they will be deleted unless we consider them to be of public interest and should consequently be archived for historical purposes. Where images have been published on social media, these platform providers may continue to process your data after the retention period has lapsed.
* CCTV footage will be deleted after 30 days unless it is required to prevent or detect a crime.
* You have a right to request the deletion of your information in advance of the above retention periods. We will delete this information unless there is a lawful reason for the information to be retained.
* To have your information restricted or blocked from processing
* If you object to processing, we will restrict the processing of your information for the purpose to which you are objecting whilst we review your objection.
* To portability
* To object to:
	+ Any processing based on legitimate interests: The right to object is specific to the data subject’s particular situation. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing, which override your individual interests, rights and freedoms or we need to continue to process your information in connection with a legal claim.
	+ Your personal information being used for direct marketing activities
	You can object to our direct marketing activities by unsubscribing from the relevant communication as described above in the marketing section of this Notice.
* The right to object extends to any automated decision-making including profiling, which we do not undertake.

To learn more about your rights, visit ICO.

To exercise any of your rights or if you have any questions about our Privacy Notice please contact:

Aida Oliveira by email at aida.routedstillnes@gmail.com, or by phone on 07950932463.

While we hope to be able to resolve any concerns you have about the way that we are processing your personal data, you have the right to lodge a complaint with the Information Commissioners Office (ICO) if you believe your data has been processed in a way that does not comply with the GDPR or have any wider concerns about our compliance with data protection law. You can do so by calling the ICO helpline on 0303 123 1113 or via their website.

**Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine reason to need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will inform you and the ICO of any personal data breaches in line with our legal obligations.

**Changes to our privacy notices**

We keep our privacy notices under regular review. This Privacy Notice was published on 11th of November 2020. Last updated 11th of November 2020

We may change this Privacy Notice from time to time and when we do, we will inform you via our website.