



## **Data Protection Policy**

### **Introduction**

To comply with the Data Protection Act (DPA) GDPR amendments which come into force on 25 May 2018, to the best of our ability we will adhere to the data protection principles, which are:

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

### **Registration**

Sara Collins of Breathing Space is registered as the data controller with the Information Commission under the Data Protection Act.

[www.breathingspace.company](http://www.breathingspace.company) email: [sara@breathingspace.company](mailto:sara@breathingspace.company) mobile:07808955060

## **Use of personal data**

Your personal data is hosted and stored by a DPA compliant data storage provider, merchant account provider and/or bank account provider for the purposes of helping us to administering course attendance and supporting other activities undertaken by Breathing Space. The personal data typically includes name, address, email address, emails sent to individuals, courses attended and other engagement with Breathing Space for the purposes of administering attendance on our courses and supporting other engagement with Breathing Space.

Individual emails to and from our email address are hosted by a DPA compliant email provider, for the purposes of administering attendance on our courses and supporting other engagement with us and will be reviewed regularly and if no longer needed for these purposes will be deleted.

Personal data will be shared only with our colleagues delivering the courses participated in and only to the extent necessary for administering the attendance of individuals on our courses and supporting engagement with Breathing Space.

Personal data will not be shared with third parties without the express permission of the individual concerned.

## **Collection of data**

When an individual's data is initially collected, the individual will be made aware of the use, which will be made of their information, by using the 'Privacy Notice' below and of this data protection policy.

### **Privacy Notice**

The data you provide to Breathing Space will be stored securely and will be used for the purposes of administering your attendance on courses and supporting other engagement with our work in accordance with our data protection policy, which can be downloaded from the about page on [www.breathingspace.company](http://www.breathingspace.company) and is in accordance with the UK Data Protection Act. To support your engagement with us we will contact you from time to time via email with guidance to support your ongoing mindfulness practice, including details of upcoming courses, which may be of interest to you. You can opt out of receiving emails from us, at any time, by contacting Sara Collins at [sara@breathingspace.company](mailto:sara@breathingspace.company)

## **Deletion of data**

An individual's records will be deleted, if requested by that individual.

Records containing personal data will be reviewed and deleted, where they are no longer required for the purposes.

Paper or electronic copies of documents containing personal information will be destroyed or deleted when a course ends, if no longer required for the purposes.

Emails to and from course participants or other individuals making enquiries to us will be reviewed regularly and if no longer necessary for the purposes will be deleted.

Paper records will be destroyed by shredding or burning.

### **Right to a copy of information held**

On request an individual will be provided with a copy of the information comprising their personal data and held by Breathing Space, within 40 days of the request and at a cost of no more than £10.

### **Information Security**

The data security arrangements of the data processors who store or process our information will be reviewed to ensure that they meet the requirements of the Data Protection Act.

We will review information security on an annual basis and review this with all those who work with us.

No personal data will be passed to an individual who is not the individual concerned without their express permission. Personal data passed on to the individual concerned will only be sent to the email address they have previously registered with us.

On receiving or making a phone call we will establish the identity of the caller before disclosing or amending any of their personal data, for example, by asking for their postcode and details of the most recent course they attended.

Where we work from home we will ensure that all computers used for processing personal data are password protected, that the password is changed regularly, that other users of the computer do not have access to the personal data of course participants and that home computers are securely stored when not in use. Computers will be screen locked or logged out of when you are away from our desks. Desks will be cleared at the end of each day and any personal information or other sensitive information securely stored in a locked cabinet. Computer screens will be positioned facing away from windows.

Passwords to data processors who store, or process participant information will not be shared with others and will be changed regularly limiting the sharing of passwords between multiple users as much as is practicable. All passwords will be substantially different from others used for other purposes or on previous occasions.

Care will be taken to prevent virus attacks by ensuring computers have virus protection software and undergo regular software updates and care will be taken when opening email attachments and when visiting new websites.

### **Employee or contractor data**

Employee or contractor personal data will ideally be stored securely in electronic form or in paper form in a locked cabinet. Any emails containing such information will be reviewed regularly and if not longer required deleted.