

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information we collect about you. When we do so we are subject to the [General Data Protection Regulation](#), which applies across the European Union (and the United Kingdom) and we are responsible as 'controllers' of that personal information for the purposes of those laws.

### Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Indirayoga
Personal information	Means any information relating to an identified or identifiable individual
Special category personal information	Means personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership. It also includes:  -Genetic and biometric data  -Data concerning health, sex life or sexual orientation

### Personal information we collect about you

By using our services we may collect and process the following personal information about you:

- your name and contact information, including email address, home address and telephone number
- your gender information and age

This personal information is required to provide yoga classes. If you do not provide personal information we ask for, it may delay or prevent us from providing yoga classes.

### Data protection principles

We will comply with the following data protection principles when processing personal information:

- we will process personal information lawfully, fairly and in a transparent manner;
- we will collect personal information for specified, explicit and legitimate purposes only, and will not process it in a way that is incompatible with those legitimate purposes;
- we will only process the personal information that is adequate, relevant and necessary for the relevant purposes;
- we will keep accurate and up to date personal information, and take reasonable steps to ensure that inaccurate personal information are deleted or corrected without delay;
- we will keep personal information for no longer than is necessary for the purposes for which the information is processed.

### Information security

We will use appropriate technical and organisational measures to keep personal information secure, and in particular to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage. These may include:

- making sure that, where possible, personal information is pseudonymised or encrypted;
- ensuring the systems we use keep the personal information confidential and secure, and are robust and resilient enough to allow for the ongoing confidentiality, integrity, availability and resilience of processing systems and services.

### **How your personal information is collected**

We collect most of this personal information directly from you—in person, by email, telephone.

### **How and why we use your personal information**

Under data protection law, we can only use your personal information if we have a proper reason for doing so, eg:

- for the performance of our services to you; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide services to you	For the performance of our services with you
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, ie to be as efficient as we can so we can delivery the best service for you
Ensuring the confidentiality of sensitive information	For our legitimate interests, ie to protect information To comply with our legal and regulatory obligations
Statistical and qualitative analysis to help us manage our business, eg in relation to funding, research	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service for you
Statistical and qualitative analysis in relation to research	For our legitimate interests, eg to publish research in the field of lactation
Updating customer records	For the performance of our services with you To comply with our legal and regulatory obligations For our legitimate interests, eg making sure that we can keep in touch with our customers and clients about existing services and new services

What we use your personal information for	Our reasons
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations  For our legitimate interests, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services to existing and former clients and customers	For our legitimate interests, ie to promote our business to existing and former customers and clients

### **Who we share your personal information with –**

From time to time and only with your explicit consent we may share your personal information with:

- cloud service providers used to store your records and our business administration papers

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

### **Where your personal information is held**

Information may be held at our offices, our IT systems and cloud service providers as described above (see above: '**Who we share your personal information with**').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: '**Transferring your personal information out of the EEA**'.

### **How long your personal information will be kept**

We will keep your personal information while you have an account with us or we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete it or shred it.

### **Transferring your personal information out of the EEA**

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), eg:

- cloud services for storage of data

These transfers are subject to special rules under European and UK data protection law.

If you would like further information please contact (see 'How to contact us' below).

### **Your rights**

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object:  —at any time to your personal information being processed for direct marketing (including profiling);  —in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: '**How to contact us**'; and
- let us have enough information to identify you eg your full name, telephone number and email address
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

### **Keeping your personal information secure**

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine need to access 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 notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **How to complain**

We hope that we can resolve any query or concern you may raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

### **Changes to this privacy policy**

This privacy notice was published on 31<sup>th</sup> August 2020.

We may change this privacy notice from time to time—when we do we will inform you via our website.

### **How to contact us**

Please contact us [and/or our Data Protection Officer] by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details
Indirayoga 176 Franciscan Road Tooting, London, United Kingdom, SW17 8HH  indirayoga@gmail.com