



# DATA PROTECTION AND PRIVACY POLICY

## Statement of Intention

It is the intention of Bamboo Grove Tai Chi School to respect the privacy of all our students. The School endorses wholeheartedly the principles of GDPR, namely:

- we must have appropriate legal grounds for processing the data that we collect and that we do it in a transparent manner;
- that we must only collect data for a specific purpose and use it only for that purpose.

## What data are collected

The data which we collect are limited to any email addresses by means of which the student may contact the School, together with the information contained on the School's Registration Form and Physical Activity Readiness Questionnaire (PARQ). A clear privacy notice and statement of consent are included on both forms. Where students pay class fees by cheque, the individual cheque number is recorded in the School's accounts for identification purposes, but bank account details are NOT recorded.

## Why data are collected

The student's name, address and contact information collected on the Registration Form are used for the administration of the students' accounts, to provide the information and services which they have requested and to contact them in connection with any communications they might send to the School. The student's medical information is used to safeguard the student's health and safety while participating in physical activity.

## Where data are held and how data are held securely

Paper copies, if available, of the completed Registration Forms and PARQs are stored in a locked filing cabinet at the Instructor's home. Digital copies or scans of these forms are held on the Instructor's antivirus- and password-protected laptop, back-up hard drive and Tutanota secure email account.

Email addresses are held on the School's password-protected Tutanota secure email account and the client software on the Instructor's password- and fingerprint-protected phone. The school's secure email account is administered by Tutanota which is based in Germany and is therefore subject to EU data-protection regulations, some of the strongest in the world.

## How long data are retained

Completed Registration Forms and PARQs are retained during the period of the student's active participation in classes and for up to one year after they have indicated that they no longer wish to attend, either by ceasing to attend classes or by formal communication. However, in exceptional circumstances, when we believe that the student may have a claim against the School or we are required to do so by our insurance company, all of a student's data may be retained for a period of up to seven years.

### Who has access to data

Only the Instructor and the Instructor's wife, acting as his representative, have access to the School's data records. We will not disclose personal data to any third parties, unless we believe in good faith that we are legally required to do so.

### What happens if we are asked about the data we hold

A copy of the student's Registration Form and PARQ, together with a written record of all email addresses held by the School will be provided upon request, together with a copy of this policy. All this information must be provided within one month of the request. Students have the right to rectify any information which may be incorrect, as well as, in certain circumstances, to request erasure, restriction of processing or object to the holding of information about them. They have the right to complain to the Information Commissioner's Office if they are concerned about how the School handles their data.

### What must happen if a security breach takes place or is suspected

If it is believed that a security breach has or may have occurred which is likely to result in damage to a person's reputation, financial loss, loss of confidentiality, or major financial or social disadvantage, the ICO should be notified. The individuals concerned should themselves be contacted without undue delay if the breach is likely to result in a high risk to the rights and freedoms of individuals. Data breaches should be reported to the ICO dedicated personal data breach helpline on 0303 123 1113 option B within 72 hours.