



Deeper into Yoga - Privacy Notice

'Deeper into Yoga' is the business name used by Michaela Palmer, a Bristol-based self-employed yoga teacher. The following document explains how and why Michaela collects and stores data from her yoga students and how this complies with GDPR processes and documentation. Michaela is the person accountable for data protection compliance within Deeper into Yoga.

Basic contact information:

Currently I deliver yoga classes and courses at the University of the West of England Centre for Sport (UWE) as well as at Portland Therapy Centre, Staple Hill, Bristol (PTC). Participants are adults; in rare cases children accompanied by a parent or guardian.

For PTC classes and courses I keep a record of basic contact details of my students as I have contractual reasons to do so, for example I need to notify students about changes to classes, cancellations etc. The data collected usually involves a student's name, email address and/or a mobile phone number. Students are asked to supply this information when they first become active in a PTC class or course. This data is entered into the class/ course register.

Registers are kept and maintained at the location of teaching (PTC and UWE). For PTC classes and courses I keep also a paper copy of the register for tax purposes, and need to keep those for 7 years. These records contain students' names and basic contact details but no further information.

For PTC classes I also store basic contact information in electronic form on my local encrypted harddrive and my mobile phone, both of which are not used by other parties. Basic contact details are kept for up to 7 years after the last class attendance, for insurance and tax purposes. For UWE classes I am not collecting or keeping any information; this is handled by the hosting organization.

Health information:

Individuals active in PTC classes and courses are asked for details beyond basic contact information. The lawful basis for this is a genuine and legitimate interest in their health and wellbeing. Thus in the first class/ course day they attend with me, students are asked to complete a paper-based health questionnaire. The information is used to protect students during the class practice. It also forms the basis for necessary adjustments to their yoga practice, and to meet their developmental needs.

The health questionnaires remain paper-based. They are treated as strictly confidential and not shared with any third party, except in the eventuality of supporting an insurance claim, in which case the student concerned is notified in advance. Health questionnaires are reviewed by each student annually, and are kept for up to 7 years after the last class/ course attendance, in case of having to face a legal challenge. After this point the health data is securely destroyed.

One-to-one students

One-to-one students at PTC also complete a health questionnaire. Due to the nature of the teaching situation, further detailed information such as results of hospital appointments, work situations or other relevant information that have an influence on the students' health and wellbeing may also be communicated, which is documented in form of a paper-based record and kept in the student's file. The lawful basis for this is a genuine and legitimate interest in students' health and wellbeing, and to ensure their developmental needs are met.

As part of the one-to-one delivery method, I also create tailor-made practice plans for each student. In terms of data this contains only the student's name. Printed versions of the plans are kept in the student's file. A copy of the currently active plan is kept on my mobile phone. For tax purposes, I keep student files for 7 years, in a secure storage facility at home.

Newsletter:

Interested individuals as well as currently active yoga students can opt in to receive a newsletter (currently emailed out half-yearly or quarterly). The sign up options are paper-based or electronic via my website (www.deeperintoyoga.com). The data collected usually involves an individual's name and email address. During the sign up process, individuals consent to this basic contact information being stored and used for marketing purposes.

The newsletter contains notifications about changes to my classes, cancellations etc. as well as forthcoming courses and other information related to my teaching of yoga. The newsletter is managed via Mailchimp. Contact details are stored in a Mailchimp list, which is not accessible to other parties or passed on to third parties. Email communications sent via Mailchimp are GDPR compatible.

Contact details are kept and are reviewed every three years until an individual unsubscribes or the newsletter ceases. Simple unsubscribe options are included in each newsletter emailed out. A GDPR form was sent out in May 2018, which asked previous newsletter recipients to re-subscribe under the new GDPR rules.

Other information:

Other information communicated to me by students, such as payment details, is not stored. This information is deleted once the intended transaction has been completed. Additional sensitive information (health, personal circumstances) communicated to me by students is treated as strictly confidential and added to their health questionnaire if it has a possible bearing on their health and wellbeing.

Subject Access Requests (SAR) and Right of Complaint:

Individuals can email me (info@deeperintoyoga.com) at any time to request access to their information. Arrangements for data to be passed on (in electronic and commonly used format) will be made after their initial request has been received via email or in writing. All individuals have the right to complain to the ICO if they are not happy with the way their data is handled.