

GDPR Privacy notice

The British Daoist Association May 2018

Purpose of privacy notice

The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the GDPR). This legislation will replace current data privacy law, giving more rights to you as an individual and more obligations to organisations holding your personal data.

One of the rights is a right to be informed, which means we have to give you even more information than we do now about the way in which we use, share and store your personal information.

This means that we will be publishing a new privacy notice so you can access this information, along with information about the increased rights you have in relation to the information we hold on you and the legal basis on which we are using it.

This new privacy notice comes into effect and will be permanently published on our website from 25 May 2018.

Who are we?

The British Daoist Association is the data controller. This means we decide how your personal data is processed and for what purposes.

Whose information does this privacy notice apply to?

This privacy notice applies to information we collect from:

- members of the BDA
- non-members attending events

What is personal data?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. Examples of personal data we may hold about you include your contact and retreat booking details. Special category data is a sub-category of personal data revealing other information about the individual. The BDA stores and processes information from this sub-category including:

- Special health needs including disabilities and dietary needs.

How do we process your personal data?

We comply with our obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. We use

your personal data for the purposes set out below.

1. We use your name, address, email and credit or debit card details to receive payment from you for your membership to the association and any retreats that you book. In addition, if you so choose, we also store your telephone/contact numbers in relation to retreat bookings in order to contact you if there are problems with the retreat. We are unable to send or receive encrypted emails so you should be aware that any emails we send or receive may not be protected in transit. We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send us is within the bounds of the law.
2. Some people may choose to send personal information about themselves to us (such as special health/dietary needs) by email or via the online, retreat booking forms. We are unable to send or receive encrypted emails so you should be aware that any emails we send or receive may not be protected in transit.
3. We keep a permanent event attendance and payment register which records all attendances for people attending our events to secure evidence in the event of criminal proceedings, civil litigation, an insurance claim or complaint against the BDA or its teachers.
4. We may use certain aspects of your contact details, to help identify people with the same name to avoid mistakes being made regarding event bookings.
5. We use any relevant health information you have informed us about to ensure you are safe during any BDA event such as a retreat. This also includes emergency contact details for use in the event of an emergency.
6. We keep accident records for any patients, visitors or staff who are involved in accidents at any of our events in accordance with UK Health and Safety legislation including the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) to comply with the law and to secure evidence in the event of criminal proceedings, civil litigation, an insurance claim or complaint.
7. In the event of an adverse incident occurring to any persons during a BDA event, we report the matter to our insurance company to enable the insurance company to deal with any potential claims and to help the BDA to review and develop its policies and procedures.
8. All contact details (name, address, telephone number, email address) are stored electronically. Emails sent between the BDA and members of the public are stored electronically on password protected computers/tablets. From time to time it may be necessary to store this information on paper. All paper records are kept in locked storage.
9. When we receive a complaint from a person we make up a file containing the details of the complaint. This also contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We usually have to disclose the complainant's identity to whoever the complaint is about. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis. We may need to provide personal information collected and processed in relation to complaints to the BDA or our insurance company.

We will keep personal information contained in complaint files, either on paper and/or electronically in line with our retention policy. This means that information relating to a complaint will be retained for seven years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle and where held electronically, with password-protected access.

10. When someone visits our website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

11. We use website cookies to improve user experience of our website by enabling our website to 'remember' users, either for the duration of their visit - using a 'session cookie' - or for repeat visits - using a 'persistent cookie'.

12. Our website search is powered by (GoDaddy). Search queries and results are logged anonymously to help us improve our website and search functionality. No user specific data is collected by us or any third party.

13. We use a third party service (GoDaddy) to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to our website.

14. We use a third party service, (GoDaddy), to host our website. We use a standard Wordpress plugin to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it.

Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared:

- with the relevant authority such as the police or a court, if necessary for compliance with a legal obligation to which we are subject e.g. a court order
- with your doctor or the police if necessary to protect yours or another person's life
- with the police or a local authority for the purpose of safeguarding children or vulnerable adults
- with our insurance company in the event of a complaint or insurance claim being brought against the BDA or its teachers
- with our solicitor in the event of any investigation or legal proceedings being brought against the BDA or its teachers.

For further details about the situations when information about you might be shared please see the Information Commissioner's website at <https://ico.org.uk/for-the-public/ersonalinformation/sharing-my-info/>

How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary. We keep information about members for the duration of paid-for membership and for a maximum of 30 days after membership has expired.

In case of any legal claims/complaints or for safeguarding purposes, records will be kept for a period of seven years.

Member data is kept up-to-date by making available contact detail update forms through our website. Information is either stored securely in locked storage (for paper-based files), or stored on

password-protected/access controlled computer(s).

Once the retention period has passed, information will be destroyed (paper-based files are shredded and electronic files securely deleted).

At any time you may request that changes are made to your contact details over the telephone, by email or in writing, as well as face-to-face with a BDA committee member or teacher.

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have certain rights with respect to your personal data as set out below.

- The right to request a copy of your personal data which we hold about you.
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for us to retain such data.
- The right to withdraw your consent to the processing at any time. This right does not apply where we are processing information using a lawful purpose other than consent.
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [This right only applies where the processing is based on consent].
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data, (where applicable) [This right only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); or direct marketing].
- The right to be informed if your data is lost. We shall also inform the Information Commissioner's Office in accordance with the time limits in the GDPR.
- The right to lodge a complaint with the Information Commissioner's Office.

For further details about these rights please see the Information Commissioner's website at <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Contact Details

To exercise all relevant rights, queries or complaints, in the first instance please contact us at:

info@daoists.co.uk

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.