



Wu Shi Taiji Quan & Qi Gong Association

Privacy notice

The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the GDPR). This legislation replaces 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 need to give you more information about the way in which we use, share and store your personal information.

This means we are publishing a new privacy notice so you can access this information, along with details 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 on 25 May 2018.

Who are we?

The Wu Shi Taiji Quan & Qi Gong Association is the data controller (registered business address: Ground Floor, 20 Blackstock Road, London, N4 2DW). 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:

- participants and students;
- prospective students;
- former students;
- people who subscribe to our marketing;
- visitors to our website.

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 details and date of birth.

Special category data is a sub-category of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. Examples of special category data we may hold about you include details of your health and medical conditions.

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.

(N.B. Information is recorded, stored and transported on paper and electronically.)

Sections 1 to 7 apply to our students, prospective students, former students, and visitors to the studios where we teach.

1. We use your name, address, telephone number and email address to advise you about classes or changes to the timetabled programme of classes*.
2. We use your name, address, telephone number and email address to send you information relevant to the care you are receiving from us and/or to your study and practice of Tai Chi and Qi Gong*.
3. We use your name, address, telephone number and email address, only if we have your explicit consent, to send you marketing materials*.
4. Some students and prospective students may tell us about their medical conditions and medication by email*.

* 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 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 any email you send us is within the bounds of the law.

5. We keep a permanent attendance register. This records all classes taken by students attending our Studio. This record of when you were attending classes for tax purposes and to secure potential evidence in the event of a criminal prosecution, civil litigation, insurance claim or complaint to our regulatory body, the British Council for Chinese Martial Arts.
6. We keep accident records for any patients, visitors or staff who are involved in accidents at the studios where we practice 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 of our patients we report the matter to the British Council for Chinese Martial Arts and our insurance company to enable the insurance company to deal with any potential claims.

This Section applies to those who complain about our services.

8. When we receive a complaint from a person we make up a file containing the details of the complaint. This normally 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 our insurance company. We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two 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. Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

Sections 9 to 14 apply to subscribers to our marketing and to our website users.

9. We maintain and use records of subscribers to our marketing, only with their consent, and for our marketing purposes only.
10. When someone visits our website, we may use a third party service 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 any third party 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 may 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'. If we do, we'll ask for your consent.
12. Where we use a website search function, search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data will be collected by us or any third party.
13. We may use a third party service to help maintain the security and performance of our website. To deliver this service it may process the IP addresses of visitors to our website.
14. We use a third party service, wordpress.com, to host our website, which may 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. For more information about how wordpress.com processes data, please see <https://automattic.com/privacy/>.

How do we share your personal data?

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

- with named third parties with your explicit consent;
- 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 a children or vulnerable adults;
- with our regulatory body, the British Council for Chinese Martial Arts or our insurance company in the event of a complaint or insurance claim being brought against us; or
- our solicitor in the event of any investigation or legal proceedings being brought against us.

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/personalinformation/sharing-my-info/>

How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary.

We keep permanent attendance registers which record all students attendance at our studio for up to 5 years after the last class you attended. This is for tax purposes in accordance with HM Revenue and Customs rules <https://www.gov.uk/self-employedrecords/how-long-to-keep-your-records>

We will aim to keep all data up-to-date for current students, store all data securely, and destroy data that is no longer necessary for us to keep.

At any time you may request that changes are made to your contact details.

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 or is necessary for the performance of a contract with you and in either case the we are processing the data by automated means].

- 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); direct marketing and processing for the purposes of scientific/historical research and statistics].
- 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 of complaints please in the first instance contact us at awais@sevenheavens.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.

END OF PRIVACY NOTICE