Policy Statement

Body Mindfulness Studio Ltd hereafter referred to as Body Mindfulness Studio requires Clients to formally consent (opt-in) or unsubscribe (opt-out) to receiving communications from the organisation.

1. Introduction

- 1.1 The Body Mindfulness Studio Privacy Policy applies specifically to information held about Clients and Juniors.
- 1.2 For the purpose of this policy, Client is used to refer to anyone who has completed a Client Record.
- 1.3 For the purpose of this policy, Junior is used to refer to anyone under 18 years of age who has a Client Record completed on their behalf by a parent or guardian.
- 1.4 For the purpose of this policy consent refers to a person freely giving permission to Body Mindfulness Studio to hold their data and use it to contact them about Body Mindfulness Studio events, relevant programmes and initiatives that may be of interest or relevant to them. Body Mindfulness Studio aims to ensure that Clients and Juniors who are asked for their consent are fully informed about what they are consenting to, and that no ambiguity or confusion is associated with Body Mindfulness Studio's request for consent. Consent can be withdrawn at any time and Body Mindfulness Studio commits to ensuring that the process for withdrawing consent will be as simple and straightforward as giving it was in the first instance.

2. Purpose

- 2.1 The role of Body Mindfulness Studio is to enable Clients and Juniors to learn and practice Nordic Body Kinetics and Gyrotonic Method®, as well as to provide opportunities for them to benefit from complementary therapies such as massage. In order for Body Mindfulness Studio to fulfil its role effectively it maintains records of Clients' and Juniors' information. This information is provided by Clients themselves or drawn from sources such as online services (see 2.2).
- 2.2 Body Mindfulness Studio continuously reviews records of Clients and Juniors to ensure data is as accurate as possible. Body Mindfulness Studio may consult alternative sources in order to fulfil this obligation. Such sources may include Royal Mail address files, phone directories, employment updates made available by Clients via LinkedIn or other social media services,

newspaper articles, company websites and other publicly available sources. Where social media services are consulted, Body Mindfulness Studio's use of information contained therein will comply with the privacy policies and terms and conditions of those services as well as with Body Mindfulness Studio's own data Privacy Policy and the UK Data Protection Act, 1998.

3. Use of Information

Where Clients and Juniors have given their consent, their data is accessible to Body Mindfulness Studio Instructors and Therapists associated with the studio. This data is used and processed for a full range of teaching and therapy purposes.

- 3.1 The information provided by Clients and Juniors is used by Body Mindfulness Studio for the following communications, which may be sent by mail, email, telephone, digitally including through social media:
 - <u>Distribution of newsletters, Blogs, reports and surveys</u>
 - Notification of studio events
 - Promotion of studio instructor training and mentoring programmes
 - Promotion of benefits and services for Clients and Juniors
 - Fundraising programmes
- 3.2 Body Mindfulness Studio may use third-party partners to support the activities described above. If a Client or Junior interacts with Body Mindfulness Studio through a third party (for example, supporting fundraising via JustGiving or a crowdfunding page) Body Mindfulness Studio may obtain information about such Clients and Juniors from that third party, only if the Client or Junior has/have given explicit consent to that third party sharing their information. The receipt of data by Body Mindfulness Studio in this manner is subject to the third party's own privacy policy. A list of parties with whom Body Mindfulness Studio partners in this way is available on request. Data obtained in this way is treated no differently to any other data once it is held by Body Mindfulness Studio, and is covered by the terms of this privacy statement.
- 3.3 Tools may be used to help Body Mindfulness Studio improve the effectiveness of its communications with Clients, including tracking whether e-mail messages sent are opened and

which links are clicked within a message. Body Mindfulness Studio monitors website visits and uses tools such as Google Analytics to improve its website and services.

4. Data analysis and updating of contact details

4.1	Body Mindfulness Studio may gather the following information:
•	Full Name
•	Address
•	Email address
•	Telephone Numbers
•	Profession/Job Title
•	Date of Birth
•	Medical History
•	Lifestyle Information such as participation in sport, activity level, smoking and alcohol consumption
This information will be collected primarily from you as information voluntarily provided to us, but we may also collect it where lawful to do so from (and combine it with information from) public sources, third party service providers or individuals who you have indicated have agreed for you to provide their personal information.	
4.2 From this information, Body Mindfulness Studio may carry out data screening. Data Screening involves reviewing personal information, such as the information listed above, to undertake an analysis of who might benefit from classes, workshops, personal programmes and other Method Putkisto initiatives or complementary therapies in the future and to understand the preferences of current Clients and Juniors about events, communications and services.	

4.3 Your personal information may also be shared with third parties (within or outside Body Mindfulness Studio) providing relevant services under contract to Body Mindfulness Studio, such as auditors and compliance managers, marketing agencies and IT hosting and IT maintenance providers. These companies may use information about you to perform their services on our behalf.

4.4 We may disclose specific information upon lawful request by government authorities, law enforcement and regulatory authorities where required or permitted by law and for tax or other purposes. Personal information may also be released to external parties in response to legal processes.

5. Safe Storage and Publication of Client Data

- 5.1 Body Mindfulness Studio will store in good faith information about Clients and Juniors that is believed to be factually correct, not excessive and relevant to the work of Body Mindfulness Studio.
- 5.2 Body Mindfulness Studio endeavours to be respectful of its constituents with regard to information retained. Body Mindfulness Studio distinguishes between "personal information" such as gender and profession and "sensitive' information. Sensitive information that is not relevant to the work of Body Mindfulness Studio will not be recorded even when published by Clients and Juniors. Sensitive information includes such data as racial/ethnic origin; political beliefs; religious/faith beliefs; Trade Union membership; sexual orientation/activities; commission or alleged commission of an offence and any proceedings such as a court sentence. Sensitive information such as physical and mental health is relevant to the work of Body Mindfulness Studio and will be recorded.
- 5.3 Body Mindfulness Studio commits to protecting Client data privacy. Body Mindfulness Studio is mindful of its duties and responsibilities under the UK Data Protection Act 1998 and follows security procedures regarding the storage and disclosure of information in order to avoid unauthorised access or loss.

6. Client Access to Own Data

- 6.1 Clients have the right to request a copy of the information that Body Mindfulness Studio holds about them.
- 6.2 Clients can obtain a copy of personal information held about them by Body Mindfulness Studio by contacting the proprietor Shirley Ruetimann via email: shirleyruetimann@icloud.com. The proprietor will endeavour to respond to such requests within ten working days of receipt during term time only. If the request is received during holidays, it will be processed at the start of the new term within ten working days of receipt. No charge is made for this service.

7 Contact with Body Mindfulness Studio

7.1 Body Mindfulness Studio will normally maintain contact with Clients via telephone, e-mail, text message, social media and post.

7.2 Clients who prefer not to receive some types of communication, or any communication, from Body Mindfulness Studio can opt-out by e-mailing shirley@bodymindfulnessstudio.co.uk.

8 Links to Other Body Mindfulness Studio Policies

8.1 This policy links to Body Mindfulness Studio Terms & Conditions www.bodymindfulnessstudio.co.uk/terms/