



This is the data protection policy of Fat Buddha House LTD trading as Fat Buddha Yoga.

Introduction

Fat Buddha Yoga is committed to being transparent about how it collects and uses the personal data including, in particular, the data of our employees, suppliers, and actual and potential clients/customers of our services.

This policy applies to the personal data of all such persons.

Data Protection Principles

- Fat Buddha Yoga processes personal data in accordance with the following data protection principles:
- Fat Buddha Yoga processes personal data lawfully, fairly and in a transparent manner.
- Fat Buddha Yoga collects personal data only for specified, explicit and legitimate purposes.
- Fat Buddha Yoga processes personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.
- Fat Buddha Yoga keeps accurate personal data and takes all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- Fat Buddha Yoga keeps personal data only for the period necessary for processing.
- Fat Buddha Yoga adopts appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

Fat Buddha Yoga tells individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in its privacy notices. It will not process personal data of individuals for other reasons. Where Fat Buddha Yoga relies on its legitimate interests as the basis for processing data, it will carry out an assessment to ensure that those interests are not overridden by the rights and freedoms of individuals.

The Legal Basis on Which We Hold Personal Data

We hold personal data under the following permitted reasons provided by the GDPR- so one of these reasons will apply to your data:

(a) Consent: the individual has given clear consent for Fat Buddha Yoga to process their personal data for a specific purpose, for example: the client has input their details via Instabook to attend our classes and make use of our services or where the client has signed up to our newsletter.

(b) Contract: the processing is necessary for a supplier or freelance contract Fat Buddha Yoga has with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for Fat Buddha Yoga to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life, for example, next of kin data / emergency contact data in case of emergency.

(e) Public task: the processing is necessary for Fat Buddha Yoga to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for Fat Buddha Yoga's legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Individual rights

As a data subject, individuals have a number of rights in relation to their personal data.

Subject access requests

Individuals have the right to make a subject access request. If an individual makes a subject access request, Fat Buddha Yoga will tell him/her:

- whether or not his/her data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual;
- to whom his/her data is or may be disclosed, including to recipients located outside the European Economic Area (EEA) and the safeguards that apply to such transfers;
- for how long his/her personal data is stored (or how that period is decided);
- his/her rights to rectification or erasure of data, or to restrict or object to processing;

- his/her right to complain to the Information Commissioner if he/she thinks Fat Buddha Yoga has failed to comply with his/her data protection rights; and
- whether or not Fat Buddha Yoga carries out automated decision-making and the logic involved in any such decision-making.

Fat Buddha Yoga will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically, unless he/she agrees otherwise.

To make a subject access request, the individual should send the request to info@fatbuddhayoga.com

In some cases, Fat Buddha Yoga may need to ask for proof of identification before the request can be processed. Fat Buddha Yoga will inform the individual if it needs to verify his/her identity and the documents it requires.

Fat Buddha Yoga will normally respond to a request within a period of one month from the date it is received. In some cases, such as where Fat Buddha Yoga processes large amounts of the individual's data, it may respond within three months of the date the request is received. Fat Buddha Yoga will write to the individual within one month of receiving the original request to tell him/her if this is the case.

If a subject access request is manifestly unfounded or excessive, Fat Buddha Yoga is not obliged to comply with it. Alternatively, Fat Buddha Yoga can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which Fat Buddha Yoga has already responded. If an individual submits a request that is unfounded or excessive, Fat Buddha Yoga will notify him/her that this is the case and whether or not it will respond to it.

Other rights

Individuals have a number of other rights in relation to their personal data. They can require Fat Buddha Yoga to:

- rectify inaccurate data;
- stop processing or erase data that is no longer necessary for the purposes of processing;
- stop processing or erase data if the individual's interests override Fat Buddha Yoga's legitimate grounds for processing data (where Fat Buddha Yoga relies on its legitimate interests as a reason for processing data);
- stop processing or erase data if processing is unlawful; and

- stop processing data for a period if data is inaccurate or if there is a dispute about whether or not the individual's interests override Fat Buddha Yoga 's legitimate grounds for processing data.

To ask Fat Buddha Yoga to take any of these steps, the individual should send the request to info@fatbuddhayoga.com

Data security

Fat Buddha Yoga takes the security of personal data seriously. Fat Buddha Yoga has internal policies and controls in place to protect personal data against loss, accidental destruction, misuse or disclosure, and to ensure that data is not accessed, except by employees in the proper performance of their duties.

Data breaches

If Fat Buddha Yoga discovers that there has been a breach of personal data that poses a risk to the rights and freedoms of individuals, it will report it to the Information Commissioner within 72 hours of discovery. Fat Buddha Yoga will record all data breaches regardless of their effect.

Individual responsibilities:

Clients

Individuals are responsible for helping Fat Buddha Yoga keep their personal data up to date. Individuals should let Fat Buddha Yoga know if data provided to Fat Buddha Yoga changes, for example if an individual moves house or changes his/her bank details.

Teachers and Directors

Fat Buddha Yoga Teachers and Directors may have access to the personal data of other individuals / clients in the course of their work at the Company. Where this is the case, Fat Buddha Yoga relies on the individual Teacher to help meet its data protection obligations for clients, as outlined below.

Fat Buddha Yoga Directors, Teachers and individuals who have access to personal data are required:

- to access only data that they have authority to access and only for authorised purposes;
- not to disclose data except to individuals (whether inside or outside Fat Buddha Yoga) who have appropriate authorisation;

- to keep data secure (for example by complying with these rules on access to data, secure password protection, secure login of the Instabook site for Fat Buddha Yoga purposes, and not storing any client data);
- not to remove personal data, or devices containing or that can be used to access personal data, from Fat Buddha Yoga's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device;
- not to store personal data on local drives or on personal devices that are used for work purposes; and
- to report data breaches of which they become aware to Jessica Skye Cattlin, Founder, Fat Buddha Yoga, immediately.
info@fatbuddhayoga.com

Failing to observe these requirements may lead to dismissal of the Teacher from Fat Buddha Yoga's schedule. Significant or deliberate breaches of this policy, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.