

Introduction:

Mindfulness Skills4Life is a small company offering mindfulness and compassion training for individual adults (defined as those over 18 years), groups of adults, children in school (or other similar organisations) and one to one adult clients. The company was founded by Dr. Sandra McCutcheon, sole trader status, in 2016. The residential address, at the time of writing, is 6 Monson Park, Skellingthorpe, Lincoln, LN6 5UE.

Given changes in EU law (coming into effect on 25th May 2018), we have prepared this document to provide transparency on our policies and the procedures we undertake to protect you as an individual and your associated personal data.

Why do we collect data personal data- what is our lawful basis?

There are two lawful bases for which we collect personal data, these are:

- **(a) Consent: this is where the individual has given clear consent for you to process their personal data for a specific purpose.**
- **(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.**

How individuals contact us:

Inquiries come to Mindfulness Skills4Life either by direct email contact from individuals or organisations or phone calls to our business telephone numbers (landline and mobile). Alternatively, adults *choose* to undertake training with us (either full courses, drop-in sessions or access FREE material online) with us. To do so, they must register for a members account with Mindfulness Skills4Life. The registration document can be accessed on our secure website, using the following URL:<https://www.mindfulness-skills4life.co.uk/members-area/register-for-the-mailing-list>

Personal data is collected, by Mindfulness Skills4Life, either electronically or on paper:**ELECTRONICALLY STORED DATA**

- 1) For those that make initial contact / general inquiry by email, we *may* have access to their self-submitted information:
 - Name, email address, and depending on what information they provide, potentially address and contact telephone number.
- 2) Those that have registered for an account with Mindfulness Skills4Life, individuals self-submit the following information:
 - names, a username (and password – this is NOT DISCLOSED to Mindfulness Skills4Life) & email address.

- 3) Those booking a place on a FREE mindfulness taster session / course, self-submit the following information:
 - names, a username, email address, password and card payment details (note that passwords and full card payment details – are NOT DISCLOSED to Mindfulness Skills4Life).

Where electronic data is stored and how it is protected:

Records containing personal data are hosted on the following electronic systems, which are legally required to comply with the GDPR:

- Electronic mail account (Microsoft Outlook)
- STRIPE (merchant payment providers)
- 123 reg (website provider)
- Bank account provider (Bank of Scotland)

Computers used by Dr. Sandra McCutcheon for administering courses, communicating either course clients and organisations are password protected and protected from virus attacked by way of antivirus software and careful use and avoidance of downloading material from new / inappropriate websites or attachments from ‘suspicious’ emails.

Who has access to electronically-stored personal data?

Only formally enlisted members of the Mindfulness Skills4Life team (that is Dr. S McCutcheon, founder and trainer and Dr. A C Gill, administrator and provider of IT expertise) have access to data provided by clients / course participants that is stored on our website or STRIPE. Other host providers (website and payment providers) will have access to data stored on their servers and electronic systems. They too will be bound by current GDPR and we follow guidelines to keep your data safe. Only Dr. Sandra McCutcheon will have access to emails exchanged between course participants / individual that make general inquiries.

PERSONAL DATA CAPTURED ON PAPER

When individuals that make initial contact by phone:

- 1) We may record the individual's name, the date of the communication and potentially email address, and telephone number – if the individual has requested information to be sent electronically or by post, or if they have requested a telephone call back.

Contact and communication from other businesses and Mindfulness Skills4Life

- 2) Other business data (not specifically personal data) may be captured on paper records. This typically would include, but may not be limited to, notes or minutes from meetings etc. These data may be headed with the name of an individual from an organisation and the date of the meeting.

Where data is stored, how it is protected & who has access:

The names and contact details of potential clients, that contact us by phone, is recorded on loose leaf sheets of paper. These are filed in a labelled 'client folder', which is stored in a locked filing cabinet, at the residential address of Mindfulness Skills4Life.

Minutes of meetings, taken *in situ*, with individual clients and / or organisation are generally recorded in an appropriately-labelled notebook dedicated for recording outcomes or conversations of meetings. These are stored in a locked filing cabinet, at the residential address of Mindfulness Skills4Life. Only Dr. Sandra McCutcheon has access to any data recorded on paper.

How is personal data shared?

Personal data (recorded electronically or on paper) will never be shared with third parties, unless we are required to do so by a court order.

How long is data retained & how is it data destroyed?

Personal data recorded on our website will be deleted, where an individual has opted out of email communication (i.e. withdrawn consent and / or if there is no contractual basis). Electronic copies of documents held by Mindfulness Skills4Life and which contain personal information will be destroyed or deleted when a course ends and if there is no consent given to communication to be continued. Emails to and from Mindfulness Skills4Life past course participants will be reviewed after 1 year and if no longer necessary for supporting their personal development through compassion-based mindfulness training, will be deleted. Similarly, emails between individuals will be deleted if consent is withdrawn.

Individuals can at any time, however, request that their personal data be deleted. This request will apply to any electronic system that Mindfulness Skills4Life has primary control over i.e. our website and email accounts. Paper records are shredded and incinerated at the business address.

YOUR RIGHTS to request a copy of the data we hold:

The new data protection regulations give you certain rights in relation to your personal data, in particular a right to a copy of your personal data and a right to have your personal data deleted. We will reply to your request within 30 days. You can exercise these rights at any time, simply by contacting us at Mindfulness Skills4Life: sandra@mindfulness-skills4life.co.uk

Here is our new privacy notice:

Your privacy is REALLY important to us at Mindfulness Skills4Life and, as such, we take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information, in accordance with our data protection policy (GDPRvFINAL_2018_MS4L) and new guidelines for data protection (effective from 25th May 2018). We will never pass your personal details to anyone else unless required to do so by court order.

To support your ongoing growth and development of your personal mindfulness practice. We may contact you from time to time (and certainly no more than necessary), with helpful practice guidance and potentially details of upcoming courses, which may be of interest for you (this represents the consent, lawful basis for collecting and processing your data). We will also contact you in relation to administering any course or session you attend (this represents the contract, lawful basis for collecting and processing your data). You should check this page occasionally to ensure you are familiar with any changes to this statement and you can opt out at any time, by clicking 'unsubscribe' link at the bottom of our emails or by contacting us: sandra@mindfulness-skills4life.co.uk (last updated 22 May 2018).