

# Inner Spiritual Journey Privacy Policy (Data Privacy)



## POLICY INDEX

Section 1	Introduction
Section 2	Definition
Section 3	Controllers
Section 4	Purpose
Section 5	Categories of Personal Data
Section 6	Legal Basis
Section 7	Sharing Your Data
Section 8	Retention Schedule
Section 9	Your obligation
Section 10	Your rights
Section 11	Data Movement
Section 12	Complaints
Section 13	Linked Polices
Section 14	Controller Details

## **1. Introduction**

Inner Spiritual Journey (ISJ) is committed to protecting and respecting your privacy.

This Policy and any other documents named, sets out the basis of which any Personal Data collected by ISJ from you, or provided by you, will be processed, stored, used and ultimately destroyed.

The guidelines on Personal Data are set out in the GDPR (General Data Protection Regulations).

## **2. Definitions**

### *Data Controller*

A controller determines the purpose and means of processing Personal Data.

### *Data Subject*

Why we are collecting data – the purpose.

### *The Data*

*Personal Data* – As laid out in Article 6 of the GDPR Personal Data relates to information identifiable to a specific person in direct or an indirect manor, including but not limited to, name, address, private email address.

*Special Data* – Under Article 9 of GDPR it lays out specific information with regarding holding Special Data, including but not limited to, genetic data, ethnic data or health data.

### *Processing*

Relates to a set of operations which are performed on the Personal Data, including but not limited to, collection, recording, structuring, storage, consultation, disclosure by face to face or transmission, erasure and or destruction.

### *Third Party*

Relates to a legal body (person or organisation) Public Authority, that the data subject, Controller or other persons under direct authority of the Controllers are authorised to process Personal Data.

### **3. Controllers**

Inner Spiritual Journey (ISJ) and Fiona Partridge (Controllers) take authority on how your Personal Data is processed.

### **4. The Purpose(s) of Processing your Personal Data**

The Controller uses your Personal Data within the following process framework:

- a) Recording appointment data using 'Setmore' online appointment system.
- b) Recording appointment data within manual securely stored paper base appointment system.
- c) Recording provided email address for future contact about appointments (and or) courses. Information stored electronically on a password protected Client Database.
- d) Recording telephone numbers to contact you regarding appointments (and or) courses. Information stored electronically on a password protected Client Database.
- e) Recording Name, address & date of birth for identification purposes. Information stored electronically on a password protected Client Database.
- f) Collection information about current / existing health conditions to aid with consultation. Unless deemed appropriate by The Controller this information will remain on the Client Record paper based filing system.
- g) All information collected on Client Record Sheets will be processed as above and stored in a secure location, and destroyed in accordance with the Retention Schedule (Section 8).

### **5. Specific Categories of Personal Data**

The Controller processes the following categories of your Personal Data:

- a) Name
- b) Address
- c) telephone number
- d) date of birth
- e) Emergency Contact details, name and telephone number
- f) Email address
- g) Current and or previous health conditions

## **6. Legal basis for processing your Personal Data**

The statement below outline the legal basis we adhere to in order to process your Personal Data:

- a) Consent of the Data Subject (in line with GDPR) completed prior to every initial Treatment.
- b) Processing is necessary for the performance of a binding contract, with the Data Subject.
- c) Processing is necessary for compliance with legal obligations – as required by law.
- d) Processing is necessary to protect the vital interests of a Data Subject or (a) another person.

## **7. Sharing your Data**

Any Personal Data disclosed to The Controller will be treated in the strictest confidence., however it may be shared with other parties to protect and uphold our Safeguarding Policy\*, to ensure best practice via Professional Supervision and to ensure your personal needs are met.

## **8. Retention Schedule**

We will only retain your Personal Data for as long as is reasonably necessary or 5 years, which ever is the earliest.

## **9. Your Obligation**

There is no statutory or contractual obligation or requirement for you to provide The Controller with your Personal Data.

## **10. Your Rights**

Unless except from GDPR you have the following rights:

1. To request a copy of all the Personal Data The Controller holds.
2. The right to request corrections are made to any Personal Data.
3. The right to request removal / destruction of Personal Data.
4. The right to withdraw consent to the processing at any time.
5. The right to request The Controller transfers all held Data to another nominated Controller (Dataportability).
6. The right, where there is a dispute in relation to the accuracy of processing to request restrictions are placed on further processing.
7. The right to object to the processing of Personal Data for direct marketing purposes.

All requests to be made in writing to The Controller (Section 13). A written response will be made available within 21 working days of receipt.

## **11. Data Movement**

The Controller will not transfer your Personal Data outside of the UK unless Section 10.5 is invoked.

## **12. How to make a complaint**

To exercise all relevant rights, queries or complaints please contact The Controller (Section 13).

If you are unsatisfied with the outcome of the complaint you have the right to lodge a formal complaint with The Information Commissioners Office Tel: 0303 1231113.

## **13. Linked Policies**

This Policy works in conjunction and to support The Controllers Safeguarding Policy.

### **13. Controller Details**

Inner Spiritual Journey  
The Retreat  
12 Counting House Way  
Stoke Heath  
Bromsgrove  
B60 3QD

Named Person: Fiona Partridge  
Tel: 07554 796300  
Email: [info@innerspiritualjourney.co.uk](mailto:info@innerspiritualjourney.co.uk)  
Web: [www.isj-worcs.co.uk](http://www.isj-worcs.co.uk)

Date of Issue	October 2019
Date of Review	November 2020