**SECTION 1. INTRODUCTION**

This policy explains how [www.veradubrovina.com](http://www.veradubrovina.com) (“Home Website”) owned and operated by Vera Dubrovina and Vera Dubrovina in her capacity as yoga teacher, therapist and doula (“I”, “us”, “we”, “our”) will handle the privacy of your information. We are committed to maintaining robust privacy protections for all our clients. We will take the necessary steps to ensure that your information is safeguarded and kept in accordance with all applicable laws and regulations.

This Privacy Policy forms part of our terms and conditions and is designed to help you understand how we collect, use, share and safeguard information we receive from our clients.

***What is data in the context of this policy?***

Personal data means data (whether stored electronically or paper based) relating to a living individual who can be identified directly or indirectly from that data (or from that data and other information in our possession). Processing is any activity that involves use of personal data. It includes obtaining, recording, holding or transferring data; organising, amending, retrieving, using, disclosing, erasing or destroying it.

***What information do we collect?***

The information that you provide us with may be collected and processed by us in accordance with the Data Protection Act 1998 and subsequent legislation (such as General Data Protection Regulation – GDPR coming into effect on 25th May 2018).

We may collect personal data, that includes your name, date of birth, address, email address, contact information, emergency contact and doctor information, financial information (payment information such as credit or debit card or direct debit details), demographic information such as preferences and interests, health related information (for yoga therapy, doula clients and retreat participants). The information can be collected through email, clinic and retreat forms, doula services forms, by telephone, in writing or in person – we may keep a copy of that correspondence or communication. Data collected is held on the grounds of being for legitimate business interests or to fulfil a contractual obligation.

We use social media to engage with users and our website links to our Facebook and Twitter pages. We do not keep any specific data that identifies an individual user but hold details of our followers on these platforms.

***How we use your personal information***

Your information will be used by us to enable us to provide our services to you. We act as a Data Controller of your information and undertake to protect your personal and sensitive data in a manner that is consistent with the requirements of the Data Protection Act/General Data Protection Regulation (GDPR). We will take reasonable measures to ensure the secure storage of your data.

Personal data submitted to us will be used for the purposes specified in this Privacy Policy, to include the following:

* administer the website and for internal record keeping to improve our goods and services;
* follow up with correspondence, email enquires including general marketing and non-marketing communications, where expressly agreed
* send you email notifications which you have specifically requested;
* notify you of any changes to our services
* ask for feedback and review products and services;

***Users of this website do so at their own discretion and provide any such personal details at their own risk.***

**SECTION 2. SHARING INFORMATION**

***Disclosure***

We do not share, sell, or distribute your data to third parties, except as provided in this Privacy Notice. We will only send you emails about our products and services (i.e. direct marketing) with your express consent. You have the option not to give consent and to withdraw consent at any time. You may withdraw your consent for us to contact you by contacting us at info@veradubrovina.com.

We may disclose your personal information if we are required to do so by law, in connection with any legal proceedings, and in order to establish, exercise or defend our legal rights, or if otherwise legally permitted. We may disclose your personal information if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights, property, or safety, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

**SECTION 3. RETAINING YOUR DATA**

We keep your personal information in accordance with our Data Retention Policy which reflects our needs to provide services to you as contracted and also as required to meet legal, statutory and regulatory obligations. The need to hold information is regularly reviewed and information/data will be disposed of when no longer required. Specifically for yoga therapy sessions, at a minimum to comply with CNHC code, your client records will be kept for eight years from the date of your last visit at the clinic.

***Storage of data:*** All data will be stored so to comply with the Data Protection Act 1998 and as enacted, the General Data Protection Regulation (GDPR). Your data can be stored digitally or in physical form and we take appropriate and adequate security measures against unlawful or unauthorised processing of personal data, and against the accidental or unlawful destruction, damage, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed. All electronically stored data is password protected and only accessible by authorised individuals. All physical data is stored in secure, lockable cabinets.

***External links:*** Users of our website are advised to adopt a policy of caution before clicking on any external web links. Clicking an external link will take the user away from our website. Once you leave our website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website’s terms and conditions. We cannot guarantee or verify the contents of any externally linked website and users click on external links at their own risk and hence we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

***Social media platforms:*** Communication, engagement and actions taken through external social media platforms that this website and its owner participate on are subject to our terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate and/or engage with them with due care and caution in regard to their own privacy and personal details. This website nor its owners will not ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

**SECTION 4. DATA SUBJECT RIGHTS**

***Subject Access Requests:*** The General Data Protection Regulation (GDPR) gives individuals, known as ‘data subjects’, the right to access personal data that is held by organisations by a subject access request (SAR). We will endeavour to respond quickly to any such requests, which legally require us to respond within one month of receiving the request and necessary information. This can be done by emailing us at info@veradubrovina.com.

***Right to Rectification:*** Data subjects have the right to request that we amend or change personal information that we hold about you, that is inaccurate or incorrect.

***Right to erasure:*** Data subjects have the right to ask us to delete personal information from our systems without giving any reason and at any time. We will act on any request without delay.

***Right to restrict processing:*** Data subjects have the right to rectification or erasure of personal data in the following circumstances:

* Personal data is not accurate;
* The processing of data is unlawful. Data subjects may request that processing is restricted;
* Data is required to exercise legal rights or defend legal claims;
* Data is unlawful but there may be lawful grounds for processing, which override this right.

***Right to data portability:*** Data subjects have the right to obtain and transfer their data to different service providers.

***Right to object:*** Data subjects have the right to object to the processing of data at any time based on their particular situation. This includes objecting to profiling unless it is in the ‘public interest’ or exercised lawfully by an official authority. We will only process data where we can demonstrate lawful grounds for doing so.

***Right not to be subject to decisions based on automated processing:*** We do not use any automated processing that results in any automated decision based on a data subject’s personal information.

***Using your rights:*** If you wish to invoke any of these rights, you can contact our Data Controller Vera Dubrovina by email to info@veradubrovina.com.

**SECTION 5. IMPORTNANT INFORMATION**

***Questions and queries:*** If you have any concerns about how we handle your data, you can contact our Data Controller Vera Dubrovina by email to info@veradubrovina.com.

***Changes to this policy:*** We reserve the right to change this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. You will be deemed to have accepted any changes to the terms of the privacy policy on your next visit of the website following the amendment.

***Complaints:*** If you have a complaint about the use of your data, you can contact us by email to [info@veradubrovina.com](mailto:info@veradubrovina.com). Alternatively, you can formally report an issue of concern to the Information Commissioner’s Office, the UK body that governs Data Protection. See https://ico.org.uk

***No Waiver:*** No failure or delay by us in exercising any of our rights in accordance with this Privacy Policy or our terms and conditions shall be deemed to be a waiver of that right, and no waiver of a breach of any provision of the Agreement shall be deemed to be a waiver of any subsequent breach of the same or any other provision.

***Severance:*** If one or more of the provisions of this Privacy Policy or our terms and conditions is found to be unlawful, invalid or otherwise unenforceable, those provision(s) shall be deemed severed from the remainder of these terms and conditions and shall remain enforceable.

***Third Party Rights:*** The terms of this Privacy Policy shall not confer rights on any third parties and accordingly the Contracts (Rights of Third Parties) Act shall not apply.

***Jurisdiction and Governing Law:*** The terms of this Privacy Policy and all disputes, whether contractual or otherwise, arising out of or in connection with the policy are governed by and shall be construed in accordance with the laws of England and Wales and each party submits to the exclusive jurisdiction of the English courts.