

Resilience Retreat Privacy Statement

We are committed to protecting the privacy and security of your personal information. This Privacy Statement describes how we collect, process and use your personal information in accordance with the Data Protection Act 2018.

In most circumstances your data will be held by us as a “Data Controller”. This means that we are responsible for deciding how we hold and use personal information about you. This statement explains how we collect and holding information and I may update this statement at any time.

It is important that you read this statement, together with any other privacy notice or statement we may provide from time to time, so that you are aware of how and why we are using such information.

The personal data we collect

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) or where the data has been aggregated so the individual is not identifiable.

We may collect, use, store and transfer different kinds of personal data about you which is collected through the retreat booking process up to and including the end of the retreat. This includes: (i) identity information, such as your name, date of birth and gender; (ii) contact information, such as you address, phone number and email address; (iii) financial information, such as bank account or card information for payment; and (iv) sensitive personal information, such as health and medical data.

How we use personal data

It is important that we collect this data for the purpose of administering the retreat, meeting insurance company requirements, ensuring your safety and wellbeing during the retreat and sending useful information to you before, during and afterwards about the retreat and future events which may be of interest to you. We will also retain your contact information for the purposes of our database and mailing list.

We may use your personal information to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

When you provide information via a booking form or booking enquiry, you are consenting to our use of the information provided for these purposes. You are entitled to withdraw this consent at any time with written notice.

We will also use your data where we are legally permitted to do so, including:

- where needed to perform the contract we are about to enter into or have entered into with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- where we need to comply with a legal obligation.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

We shall only share your personal data with third parties for the purposes of the retreat. We require all third parties to respect the security of your personal data and to treat it in accordance with applicable law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

How we protect your personal data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

How long we use your personal data for

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use

or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under applicable in relation to your personal data. Please see the appendix for further details of these rights and contact us in writing if you wish to exercise any of these rights at any time.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Changes to this statement and your duty to inform us of changes to your information

We keep our privacy statement under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Appendix

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data where we are relying on a legitimate interest** (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

