### **Open Minds Active Ltd Privacy Policy**

Open Minds Active Ltd ("OMA" or "we") are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

OMA will process your personal information in accordance with the EU General Data Protection Regulation 2016/679, or any of its nationally implementing or equivalent legislation ("GDPR"). For the purposes of the GDPR, OMA is the data controller in respect of your personal information that we process.

If you have any questions about this privacy policy, or wish to contact OMA in relation to any of your rights in relation to your personal data, please contact Maggy Blagrove at Open Minds Active at: maggy@openmindsactive.org.

#### 1. What information do we process about you?

We will collect and process the following personal information from you, as a result of your interaction with our website https://www.openmindsactive.org/ ("our site"), attendance at our swim or yoga retreats, session activities, or otherwise as described below.

# Information you give us

The personal information that you may provide to us, and which we may collect and process, includes your:

- Names
- Date of birth
- Country of residence
- Email address
- Residential and billing addresses
- Telephone number
- Payment information
- Message contents, such as comments or questions

#### Information we collect about you

With regard to each of your visits to our site we will collect the following information automatically:

- technical information, including the internet protocol (IP) address used to connect your computer to the internet, your browser type and version, operating system and platform; and
- information about your visit, including page response times, download errors and page interaction information (such as scrolling, clicks, and mouse-overs).

### 2. What cookies do we use?

Our site does not uses cookies to distinguish you from other users of our site. If we introduce them in the future it would be in order to helps us to provide you with a good experience when you browse our site and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Every time you return to our site, the browser retrieves the cookie and sends it to the site's server.

We use the following cookies on our site:

- Strictly necessary cookies these are cookies that are required for the operation
  of our site. They include, for example, cookies that enable you to log into secure
  areas of our site.
- Analytical/performance cookies these allow us to recognise and count the number of visitors and to see how visitors move around our site when they are using it. This helps us to improve the way the site works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies these are used to recognise you when you return to our site. This enables us to personalise our content for you and remember your preferences.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

### 3. What are our legal bases for processing your personal information?

In respect of any other of your personal information that we process in connection with any interaction that you make with our site, any donation that you choose to make or your attendance at any of our yoga or swim breaks or activity sessions. We will process that personal information on the basis of carrying out our legitimate interests in obtaining and responding to your queries.

#### 4. How do we use your information?

We use your personal information that we hold about you in the following ways:

- organise our events, retreats, weekend breaks, activities
- respond to your comments and questions
- process any donations you make to us
- send you information about our organisation that you request

# 5. Who may we share your personal information with?

We may share your personal information with:

- Our third party vendors, consultants, and other service providers who work for us and need access to your personal information to provide their services to us and in turn perform certain functions on our behalf. These third parties will have access to your information only for purposes of performing these services or tasks on our behalf.
- Insurers for the purpose of providing insurance and handling claims and repairs in certain circumstances.
- Other parties for legal reasons, such as public and government authorities to respond to any request they have, or other legal authorities, professionals or courts to comply with court orders and other legal processes, pursue available

remedies, limit damages we may sustain, protect our operations or protect the rights, privacy, safety or property of ourselves, you and others.

## 6. What security measures do we put in place?

Confidentiality and security of your personal information are very important to us. We have implemented appropriate administrative, technical and physical security measures to protect your information from loss, unauthorised access, use, modification or disclosure.

We review our internal security policies and guidelines from time to time to take into account new technology and methods, the risk represented by the processing and the nature of the data being protected. We limit access to our databases containing personal information to authorised persons having a justified need to access such information and limit retention periods to retain data for no longer than is necessary.

All personal information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will use all reasonable measures to protect your personal information, we cannot guarantee the security of your personal information transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent any unauthorised access.

## 7. What rights do you have in relation to your personal information?

You may have the following rights in relation to your personal information to the extent permitted by the GDPR:

- to rectify any inaccurate personal information that we hold about you
- to have your personal information erased under certain circumstances
- to have the processing of your personal information restricted where you dispute
  its accuracy, if you think its processing is unlawful, if you otherwise object to its
  processing, or when we no longer need your personal information and you need
  it in relation to a legal claim
- to have access to your personal information, and the right to receive copies of your personal information in a structured, commonly used and machine-readable format and transfer those copies to another data controller, under certain circumstances
- to complain to your national data protection regulator if you feel that any of your personal information is not being processed in accordance with the GDPR

You may also withdraw any consent that you give us to process your personal information by emailing: info@openmindsactive.org. If you withdraw your consent, we will stop processing the relevant personal information unless we have another grounds for processing it under applicable laws.

#### 8. For how long do we retain your personal information?

Personal information is retained by OMA for no longer than is necessary to manage our events, donations and responses to any questions or comments you may have.

# 9. Changes to our privacy policy

We may change our privacy policy from time to time and will denote the date of the policy by changing the "last updated" date below. We will provide additional notification if these changes are material.

Last updated 31 January 2020