

# PERSONAL DATA AND PRIVACY POLICY

## INTRODUCTION TO THE CHARITY

The Sayagyi U Ba Khin Memorial Trust (the Charity) is a charitable trust registered with the Charity Commission (registered no. 280134). It owns and administers the International Meditation Centre in Wiltshire (IMC-UK).

The Charity's website is [www.internationalmeditationcentre.org/uk](http://www.internationalmeditationcentre.org/uk).

10-day residential courses in Theravada Buddhist meditation in the tradition of Sayagyi U Ba Khin and Mother Sayamagyi are held monthly at IMC-UK, taught by a qualified teacher. These courses are open to applicants from all walks of life who are willing to give the meditation a fair trial and who are physically and mentally able to practise the meditation.

## PERSONAL DATA AND PRIVACY

In order for the Charity to run the meditation courses referred to above, while fulfilling its responsibilities, it processes (i.e. records, copies and refers to) personal data relating to the students who apply for courses at IMC-UK, as originally submitted in their application forms (and amended subsequently where applicable). Students complete an application form when applying to attend a course at IMC-UK for the first time. They are not required to complete a form for any course they attend subsequently, so long as their details remain on the Charity's database.

## WHAT PERSONAL DATA DO WE COLLECT?

### Personal Data Recorded on a Database

The Charity records the following data (if given) on its database relating to those who have applied to attend a course at IMC-UK:

- Name, date of birth, nationality, gender, address, email address, telephone numbers
- Source of introduction
- Any food allergy notified by application form or other means
- Whether or not he/she wishes to receive a copy of the twice-yearly IMC-UK Newsletter (with information about future course dates) and, if so, whether by post or email
- Whether or not a Gift Aid declaration has been made (see below)

### Personal Data Recorded Elsewhere

- Course application forms (these are retained only for the duration of the applicant's first course)
- Gift Aid declarations made by those who have given and/or propose to give (a) donation(s) to the Charity and any donations on which Gift Aid has been claimed
- Email correspondence relevant to students' enquiries

## WHAT DO WE DO WITH YOUR PERSONAL DATA?

The teacher and managers use your information:

- To make sure you will be able to benefit from a course and that we are able to provide for any support needs you may have
- If you are a child or a vulnerable adult, we will need to check that you have the necessary parental consents and, where necessary, are chaperoned
- To answer your correspondence
- Where you have asked us to do so, to send you a bi-annual newsletter with forthcoming course information and occasional news of any other special events at IMC-UK
- Where you have made a valid Gift Aid declaration, to make Gift Aid claims to HMRC (if eligible)

We do not share your personal details with anyone outside the organisation.

## WHAT IS THE LEGAL BASIS FOR THE CHARITY'S DATA PROCESSING?

By law, the Charity may only process personal data where there is a legal justification for doing so.

In accordance with that law, the Charity processes personal data as described above because it is necessary for the purposes of the legitimate interests pursued by the Charity, namely:

- to protect the interests of the students attending (or applying to attend) courses at IMC-UK, whether before, during and/or after attending meditation courses at IMC-UK and to manage its relationship with its students generally; and
- to comply with its legal obligations in relation to the students, including those relating to health and safety (including food safety) and safeguarding;
- to send the bi-annual Newsletter to students (unless they have indicated they do not wish to receive it) and to notify them of any special events at IMC-UK.

Where we use your personal data for the Charity's legitimate interests, we use appropriate safeguards and make sure that we take into account any potential impact that such use may have on you. If we believe that your interests or fundamental rights and freedoms override our legitimate interests then we will not use your personal details on this basis and may seek your specific consent.

## YOUR RIGHTS IN RELATION TO PERSONAL DATA

You have the following rights in relation to your personal data.

### **1 The right to information and access**

You have the right to request access to the information we hold about you.

On request the Charity will provide you with copies of your personal data in a convenient format.

## **2 Rectification, erasure and restriction**

You have the right to ask us to limit or cease processing or erase information we hold about you in certain circumstances. In responding to such requests, we will let you know the impact of such restrictions or deletions. For example, if your details were deleted, we would no longer be able to send you a Newsletter and, if you subsequently wished to attend a course at IMC-UK, you would be required to complete a new application form.

The Charity takes reasonable steps to ensure that the personal details it holds about you are accurate and up to date, as long as we are provided with the necessary information to make necessary changes. We will comply with any request to rectify inaccurate data we may hold about you. However, the Charity relies on the accuracy of the information you supply to us. If you are aware of any changes to the information you have supplied to us previously, please let us know so we can amend our records.

## **3 Right to object**

You have the right to object to the Charity using your information on the basis of its legitimate interests. You may action your rights by contacting us as set out below and we will comply with your request unless we have a lawful reason not to do so.

The Charity will endeavour to handle any such requests within a reasonable period and in any event within one month of the original request.

## **4 Contact**

Requests for access or to rectify, erase or restrict the use of your personal data or any objection should be sent by email to: [secretary@internationalmeditationcentre.org](mailto:secretary@internationalmeditationcentre.org), or by post to: The Secretary, IMC-UK, Splatts House, Heddington, Calne SN11 0PE.

## **DATA SECURITY**

The Charity takes appropriate technical and organisational measures to protect the personal data we transmit, store or otherwise process against accidental or unlawful destruction, loss, alteration or unauthorised disclosure or access.

The contents of all paper application forms are input manually into a database which is password protected and not connected to the Internet. The paper copies are shredded. Students' personal data is backed up to onsite and offsite locations on a regular basis.

## **HOW LONG DOES THE CHARITY RETAIN PERSONAL DATA?**

The Charity will only retain personal data for as long as it is necessary for the purposes of its legitimate interests or other legal requirement. Please contact us if you require further information about our retention policies.

## **DATA BREACHES**

In the event of any breach of the Charity's systems impacting on the security of a student's personal data the Charity will inform the individual(s) concerned as soon as practically possible, describing the nature of the breach, the possible consequences and the remedial measures being taken.

## COMPLAINTS

If you are unhappy about the way the Charity processes your personal data, please contact us using the contact details below.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO). Their contact details are:

Information Commissioner's Office,  
Wycliffe House, Water Lane, Wilmslow, SK9 5AF  
Tel: 0303 123 1113 (local rate) or 01625 545 700  
or via their website: <https://ico.org.uk/global/contact-us>

## CONTACT US

If you have any comments or queries relating to this policy, please write to: The Secretary, IMC-UK, Splatts House, Heddington, Calne SN11 0PE, or send an email to: [secretary@internationalmeditationcentre.org](mailto:secretary@internationalmeditationcentre.org).

## UPDATING THIS POLICY

We may change our data processing policies and activities from time to time. We will notify you of any changes to this policy as required by law and post an updated version on our website.