



## **TAOIST ARTS ORGANISATION (TAO) PRIVACY POLICY - 24 MAY 2018**

The Taoist Arts Organisation (TAO) is committed to protecting and respecting your privacy. We take your privacy very seriously and we ask that you read this Privacy Policy carefully as it contains important information on:

- The personal data we collect about you
- How we look after your personal data when you visit our website (regardless of where you visit from)
- With whom your personal data might be shared
- Your privacy rights and how the law protects you.

### **WHO WE ARE**

The TAO is a Martial Arts Organisation whose main base is in the United Kingdom, with other affiliated clubs based in France and Germany. For more information about the TAO please visit <http://www.taoistarts.org>. The TAO is a not-for-profit organisation.

This Privacy Policy is issued on behalf of the Taoist Arts Organisation (TAO), so when we mention "TAO", "we", "us" or "our" in this Privacy Policy, we are referring to the organisation itself responsible for processing your personal data.

This Privacy Policy also makes reference to TAO Instructors/Members, some who may have data handling responsibilities of TAO data (eg Committee members/ designated individuals), but may also process their own data as independent Instructors (such as special category data of their students), for which, especially the latter, TAO as an organisation has no duties, responsibilities or data control. Similarly, all data collected and processed by TAO affiliated clubs in France and Germany is the sole responsibility of TAO Instructors in those countries who are the sole data controllers governed by their countries' regulations for that data and not TAO UK.

### **PERSONAL DATA WHICH WE COLLECT**

#### **Personal data provided by you**

We collect personal data about you when you:

- Become a member of the TAO
- Book on a course/ class at one of our venues
- Purchase or make payments for any of our courses/ classes
- Contact us through our website
- Apply for a committee role with us
- Sign up to receive our newsletter
- Complete any feedback
- Participate in competitions, classes or courses

The personal data collected in the above manner may include your:

- Full name
- Postal address
- Email address
- Telephone number
- Photograph or video
- Courses/ classes which you are interested in/book and/or attend

The lawful basis for the TAO collecting and processing your personal data is *consent*.



### Personal data provided by 3rd parties

The TAO does not receive information about you from other sources, but the TAO branches based in other EU countries do at regular intervals send their member details to TAO UK which are included in the main TAO database and or access the database themselves directly to create new memberships.

### Special categories of personal data

The TAO does not hold any special category personal data about you. TAO instructors do collect and process special category data (health information) about their students, with their consent (*lawful processing requirement*) under the condition of *vital interests (condition requirement)*. This health information and next of kin details are kept so that the instructors can ensure the safety of their students during class and in the event of an emergency and also hold an emergency contact for such circumstances. Instructors collect such data with the student's explicit consent. Instructors operate independently in their data controller duties for processing such special category data and the TAO will not be liable for any data breach thereto on the part of the instructor.

The TAO does not request for any special categories of personal data to be disclosed to us as part of your TAO membership application.

### Personal data about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- Give consent on his/her behalf to the processing of his/her personal data
- Receive on his/her behalf any data protection notices
- Give consent to transfer his/her personal data outside the European Economic area
- Give consent to the processing of their special category personal data (further details relating to special category personal data is detailed below).

## **HOW WE USE YOUR PERSONAL DATA**

### Overview

We collect information about you so that we can:

- Identify you and manage your membership and insurance
- Manage your course bookings and ensure that we can provide you with a personalised experience
- Process any orders for classes/courses you make with us
- Assist you with your queries in relation to our organisation and classes/courses
- Review and process any of your competition entries / results
- Conduct statistical member analysis as required
- Notify you of any changes to our website or to our services that may affect you
- Improve our services
- Where relevant place information about you on our website (eg about competitions) or multimedia such as newsletters (eg photos/articles), training manuals and training archive (e.g photos/videos)

The TAO does not perform any member profiling or analysis of preferences



## Marketing

We would like to send you information by email about our products and services, competitions, courses, classes, noticeboard and newsletter publications and special offers which may be of interest to you.

We will only send you marketing messages when you click to subscribe on our website or tick the relevant consent box when you provide us with your personal data. If you have consented to receive such marketing from us, you can opt out at any time by using the unsubscribe function on each of our emails or by contacting us directly through the “Contact Us” section of our website.

## **WHEN WE MIGHT SHARE YOUR PERSONAL DATA WITH THIRD PARTIES**

As an essential part of being able to provide our TAO membership services to you, your data is held on the TAO database based in the UK which is accessible by nominated TAO Instructors within the UK, France and Germany.

For UK members, The TAO needs to send your personal data to the British Council for Chinese Martial Arts (BCCMA) so that they can provide you with your BCCMA licence and training insurance (required for full TAO members only). For information on how BCCMA will use your data, please contact them and/or read their Privacy Policy available via their website <https://bccma.com>. Your data is also shared with service providers that help us to run our Organisation such as website hosting providers and website developers.

We do not and will not otherwise sell or give any of your personal data to any third party – including your name, address, email address or payment information. We want to earn and maintain your trust, and we believe this is essential in order do that.

There may be situations where by law and statute we may have to share your information with law enforcement agencies in connection with any investigation to help prevent unlawful activity.

## **HOW WE ASK FOR CONSENT**

In those cases where we need your consent to hold and process your personal data, we will ask you to check a box and/or sign a form requiring consent (except when subscribing to our newsletter via our website, when we will advise you how to subscribe). By checking these boxes/ signing forms you are confirming that you have been informed as to why we are collecting the information, how this information will be used, for how long the information will be kept, who else will have access to this information and what are your rights as a data subject (all of which is set out in this Privacy Policy). The TAO will hold your data for the options you provide consent to.

## **HOW WE KEEP YOUR DATA SECURE**

To protect your information we have policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner, and all systems that can access the information have the necessary security measures in place.



All TAO instructors/members with access to the database and/or your personal data (e.g. course organisers) receive the necessary GDPR awareness training and resources, through provision of our Data Protection Policy (which includes helpful factsheets and appendices), this Privacy Policy, and/or meetings to ensure they understand their responsibilities and legal obligations in relation to all of our policies and procedures and current legislation.

In addition to these operational measures we also use a range of technologies and security systems to reinforce the policies and procedures, including ensuring that:

- Access to personal data is strictly restricted to those TAO instructors/members who need to access this information as part of their role
- We store your personal data on secure servers and unauthorised external access to personal data is prevented through the use of a firewall
- Where required any communications about TAO members is treated confidentially and may be anonymised (so that it does not identify you)
- We store your personal data on secure servers
- To make sure that these measures are suitable, we run vulnerability tests regularly
- Audits to identify areas of weakness and non-compliance are scheduled from time to time as required.

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA**

We shall only retain your information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

As a general rule, membership details are kept on the database for the duration of TAO membership and for 2 years following overdue renewal, following which these are securely and permanently deleted (electronic and paper records). If you would like more information about how long we retain specific types of your information, please contact us on the contact details provided later in this Privacy Policy.

## **TRANSFERS OF YOUR PERSONAL DATA OUT OF THE EEA**

All information you provide via our website is stored on our secure servers within the European Economic Area (“EEA”). If, in future, any data that we collect from you is transferred to, or stored at, a destination outside the EEA at any time, we will update this Privacy Policy accordingly. When you link to a social media site via our website, any personal data which you provide them may be transferred or stored outside the EEA. Please check their websites’ privacy notice and policy carefully.

## **YOUR RIGHTS**

### **The right to access information we hold about you**

At any point you can contact us to request the information we hold about you as well as why we have that information, who has access to the information and where we got the information. Once we have received your request we will respond within 30 days.

### **The right to correct and update the information we hold about you**

If the information we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.



### **The right to have your information erased**

If you feel that we should no longer be using your information or that we are illegally using your information, you can request that we erase the information we hold. When we receive your request, we will confirm whether the information has been deleted or tell you the reason why it cannot be deleted.

### **The right to object to processing of your information**

You have the right to request that we stop processing your information. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your information to comply with your other rights.

### **The right to ask us to stop contacting you with direct marketing**

You have the right to request that we stop contacting you with direct marketing.

### **The right to data portability**

You have the right to request that we transfer your information to another controller. Once we have received your request, we will comply where it is feasible to do so.

The TAO does not conduct any automated decision making and/ or profiling.

For your security we may need to verify your identity before we process your instructions above.

## **COOKIES AND TRACKING**

### **Use of cookies**

A cookie is a small text file which is placed onto your device when you access our website. We use cookies on our website to Make your online experience more efficient and enjoyable.

In most cases we will need your consent in order to use cookies on our website. The exception is where the cookie is essential in order for us to provide you with a product or service you have requested.

### **Consent to cookies**

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to our use of cookies and other similar technologies as described in this Privacy Notice and Policy. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely.

### **Turning off cookies**

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>.

## **TAKE CARE WHEN LINKING TO OUR SOCIAL MEDIA SITES**

Our website provides links to our social media sites. Once on any of these social media sites, please take care if you choose to post any information as this will be on a public domain and may be widely accessible. If you would like more information about how any information posted on these sites will be used, please the sites' privacy notice and policy carefully.



## CONTACTING US

If you have any queries about this Privacy Notice and Policy, need further information about how the Taoist Arts Organisation uses your personal data or wish to lodge a complaint, please contact us by any of the following means:

- Email us at: [taoistartsorg@hotmail.com](mailto:taoistartsorg@hotmail.com)
- Contact us using our “Contact us” page on the website.

You also have the right to lodge a complaint with the Information Commissioner’s Office directly. Further information, including contact details, is available at <https://ico.org.uk>.

## CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Policy Notice from time to time. You should check this Privacy Policy Notice occasionally to ensure that you are aware of the most recent version that will apply each time you access our website or manage your TAO membership.

Where we have made any changes to this Privacy Policy which affects the manner in which we use your personal data, we will contact you by email where possible to inform you of this change.

This Privacy Policy Notice was last updated on 24 May 2018 on behalf of the Taoist Arts Organisation.

Reference: <https://ico.org.uk/for-organisations/>

## TAO Responsibility Statement:

The information contained in this Policy represents the TAO’s interpretation of the law as at the date of this edition. The TAO takes all reasonable care to ensure that the information contained in this Policy is accurate and that any opinions, interpretations and guidance expressed have been carefully considered in the context in which they are expressed. However, before taking any action based on the contents of this Policy, readers are advised to confirm the up to date position and to consult the ICO on the reference, or relevant country authority for members outside the UK, regarding their individual circumstances.

If you have any queries, questions or comments on the information contained in this policy, kindly contact the TAO secretary on [taoistartsorg@hotmail.com](mailto:taoistartsorg@hotmail.com)

