

# **RULES OF PROTECTION OF PERSONAL DATA BY MAITRI KARUNA**

September 2020

The protection of your personal data is taken very seriously.

Following changes in legal regulation relating to the protection of personal data, we set out below a list of basic principles, which we believe may be of interest to you. These contain information relating to which of your personal data we process, for what purpose, and which rights do you have in relation to such data.

We would also like to assure you, that technical and organizational measures are in place designed to ensure that your personal data is secure.

## **1. IDENTITY OF THE ADMINISTRATOR**

The administrator of the personal data is YOGAJOGA s.r.o. with its seat at Vodickova 15, Praha 1, Identification Number: 24257010, registered with the Municipal Court in Prague, section C, insert no. 198047 (the “Administrator”).

Recommended contact details are telephone +420 777 237 982, or e-mail: [info@maitrikaruna.cz](mailto:info@maitrikaruna.cz)

## **2. SUBJECT OF PROCESSING**

The following personal data is processed:

- a) identification data (such as name, surname, date of birth etc.);
- b) contact data (such as address, telephone, email etc.);
- c) payment data (for staff salary payments etc);
- d) information relating to your financial credit;
- e) attendance records;
- f) data relating to the history of education;
- g) images;
- h) movements and acts in monitored areas (without audio recording); and
- i) health data.

## **3. REASON AND LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA**

Your personal data is processed for the following reasons and on the basis of the following legal rights:

- a. The provision of therapies and workshops (further the “WS”) based on the fulfilment of the agreement entered into between you and us in relation to your registration or reservation or on the basis of our fulfilment of the request of your employer;
- b. The provision of adequate premises on the basis of our interest on ensuring safe and proper use of our premises;
- c. The provision of information on the balance on your client account, on the basis of the agreement entered into between you and us in relation to your registration;

- d. The payment for services provided on the basis of the agreement entered into between you and us in relation to your registration or on the basis of our interest in allowing payments by discount vouchers;
- e. The introduction of our company and support of its development – marketing on the basis of our interest in supporting our company and improving our services; in certain circumstances this will be on the basis of your specific consent;
- f. The administration of our assets on the basis of the agreement entered into between you and us in relation to the rental of our premises;
- g. The protection of assets and persons on the basis of our interest in ensuring the safety of our and your assets as well as general provision of safety on the monitored premises;
- h. The protection of legal entitlements on the basis of the agreement entered into between you and us in relation to enabling you to practice yoga on our premises, or on the basis of our entitlement to provide for the possible enforcement of our rights and entitlements as well as ensuring the back up of all documentation; and
- i. entering into agreements with suppliers and contractual partners on the basis of the agreement entered into between you and us, where the personal data of the contact persons are being specifically processed.

Your health data are processed only with your specific consent in relation to the provision of WS and therapies.

#### **4. DURATION OF PROCESSING OF YOUR PERSONAL DATA**

Your personal data that is processed by us is only kept for certain period of time. At the end of the relevant period the data is deleted. Specifically, we keep your personal data for the following periods of time:

- a. In relation to therapies and WS, the data is kept for the duration of the agreement and then for the 10 years following, or in relation to your registration for the period of 1 year following your last active participation;
- b. as we do not process your personal data in relation to provision of premises and client account information, we do not keep such data;
- c. in relation to payments for services for the period of 10 years;
- d. in relation to the introduction of our company and the development of our company – marketing, until the revocation of your consent or for the period of 1 year;
- e. in relation to maintenance of our own assets for the duration of the agreement and following the termination of such agreement for a period of 10 years;
- f. in relation to protection of assets and persons for the period of 14 days, after which the data is automatically deleted;
- g. in relation to protection of our legal rights for the duration of the agreement and for the period of 1 year following termination of such agreement in respect of individual practice, 5 years in respect of attendance records and 10 years in respect of back-up of information;
- h. in relation to conclusion and fulfilment of agreement with our suppliers and contractual partners for the period of fulfilment of such agreements and for the period of 10 years following termination of such agreements.

#### **5. RECIPIENTS OF YOUR PERSONAL DATA**

Whilst processing your data it may be provided to, or access to it may be given to, the following processing agents, who are processing such data on the basis of our instructions (these agents may not process your personal data for their purposes):

- a. provider of reservation and attendance systems;
- b. advertising portals;
- c. international teachers and examiners;
- d. external marketing specialists;
- e. technicians of the camera system;
- f. provider of the cloud services; and
- g. provider of e-mail marketing services;

During processing of your personal data we may provide or make the data available to the following providers, mainly on the basis of relevant legal regulations:

- a. social networks;
- b. public authorities; and
- c. health insurance companies.

## **6. YOUR RIGHTS RELATING TO PERSONAL DATA PROTECTION**

### **1. Enforcement of your rights**

If you would like to enforce any of your above listed right, or just make an enquiry, you are entitled to do so by e-mail on [info@maitrikaruna.cz](mailto:info@maitrikaruna.cz) or on the above stated correspondence address.

We shall process your enquiry within 1 month. Should this period be exceptionally prolonged, we would inform you of this.

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### **2. Right to revoke the consent**

You are entitled to revoke your consent to the processing of your personal data. Upon receipt of such request, we will ensure, that your personal data to which your consent was given will no longer be processed.

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### **3. Right of access**

From this information you know generally which of your personal data we hold, why and for how long we keep it. You have a right of access to your specific personal data that we process and also to request a copy of this data. The first copy will be provided free of charge, further copies shall be provided against a fee of 250,-CZK (two hundred fifty Czech crowns)

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### **4. Right of correction**

You are entitled that only your correct and full data are processed. If this is not so, you are entitled to correct or update of such data.

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### **5. Right of deletion**

In certain circumstances you may be entitled to require that we delete personal data held by us. In such case, provided all the conditions are met and the processing of your personal data is no longer required to fulfill our legal obligation or the establishment, execution or protection of our legal rights, we shall do so.

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**6. Right of limitation of processing**

In certain cases, you are also entitled to request, for a certain period of time, (unlike in the case of your right to the deletion of your personal data that we hold, never for a permanent period of time) a suspension of the processing of your personal details.

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**7. Right to transfer**

You are entitled to request that we transfer your personal data, processed by us in our electronic databases on the basis of the agreement concluded with you, in a usual format and in a legible printed format to other administrators.

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**8. Right of objection**

You are entitled to raise an objection against processing that we carry out on the basis of our legitimate entitlement.

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**9. Right of complaint**

You are entitled to file a complaint against the processing of your personal data at the relevant public office, The Office for Protection of Personal Data, Pplk. Sochora 27, 170 00 Praha 7.