

This is the
PRIVACY POLICY OF



Dated 21st May 2018

PRIVACY POLICY

This Privacy Policy informs all Students and Clients of *Systema Mid Wessex*, about what occurs when *Systema Mid Wessex* collects, processes and stores information involving your personal data. This policy is resultant from a new & enhanced set of Data Protection Regulations introduced by the EU, to be known henceforth from the 25th May 2018, as the General Data Protection Regulations (“GDPR”).

Systema Mid Wessex regards your privacy as extremely important. These new regulations, which enhance those originally introduced in 1998, set very high standards of compliance which *Systema Mid Wessex* equally seeks to employ.

This Notice sets out our policy & processes to ensure that we both comply and provide you with the confidence necessary, going forward. This policy explains as plainly as possible, how *Systema Mid Wessex* complies with the personal data regulations of both British & European authorities.

1. SYSTEMA MID WESSEX – OUR IDENTITY

- 1.1 *Systema Mid Wessex* is our trading name and is operated as a Sole Trader business. Robert Hodgkinson is the sole proprietor of the business – its address being c/o 21 Webster Road, Winchester, Hampshire, SO22 5NT.
- 1.2 *Systema Mid Wessex* henceforth is known as (“I”, “Me”, “My” or “Myself”)
- 1.3 This privacy policy conveys, at the date of inception (May 22nd, 2018), evidence as to how I will collect, process & store your personal data. This notice also informs you of your rights.
- 1.4 I will as time evolves, update, enhance and supply, modified versions of this Policy as and when I consider it necessary to maintain compliance with current and revised DPA, GDPR & PECR regulations.

DPA > “Data Protection Act of 1998”
GDPR > “General Data Protection Regulations”
PECR > “Privacy & Electronic Regulations”

- 1.5 Robert Hodgkinson is both the “Data Controller” (the person responsible for collecting your personal data and managing this with third parties’) and “Data Processor” (the person responsible for managing your personal data as administered by or through third parties) for *Systema Mid Wessex*.

2. COMMITMENT TO YOUR PRIVACY

I will ensure that your privacy, in terms of personal data including that which is deemed sensitive, is managed within the most secure, technical and professional (processes) structure possible, appropriate to the size, technical capability and working capacity of my business, necessary to protect such data for as long as you want me to.

3. THE LAW – HOW GDPR PROTECTS YOU

- 3.1 Under the GDPR regulation, your privacy is protected by law which means I can only use your personal data if there is a genuine or appropriate reason to do so. This not only includes usage just within *Systema Mid Wessex*, but externally with third party providers / suppliers. There are effectively eight rights that I must guarantee, are being safeguarded.

3.2 These rights are outlined below; namely the:

- a) **Right to be informed:** Provides clarity over how your personal data is used by Me;
- b) **Right to access:** You can access your data and observe how it is used on its own and alongside supplemental data where deemed appropriate;
- c) **Right to rectification:** If your personal data needs rectifying or is inappropriate or erroneous, you can ask Me to amend, delete or add to the data as appropriate;
- d) **Right to deletion:** You have the right to inform Me to remove your personal data if you deem that I have no compelling reason to hold such data. However, on occasions this may not be viable;
- e) **Right to restrict processing:** You can allow your data to be stored rather than also managed (processed). An example might be when you consider that your data is incorrect or incomplete, and thus not to be used in any other activity other than storage;
- f) **Right to data portability:** You can request that personal data that I have collected, processed and stored about you, be duplicated, transferred and stored elsewhere. However, as such data supplied by you is limited in nature, I do not consider this relevant to the business currently;
- g) **Right to object:** You can object to me processing some or all your personal data (e.g. for a newsletter) at any time;
- h) **Rights to automated decision making and profiling:** While you have the right to object to automated decisions (meaning without any human interference) being made based on your data being processed, there are currently no technological systems or requirements in place within *Systema Mid Wessex's* domain, that either allows or aspires me to undertake such actions.

3.3 The above listing is a high-level overview of your Rights. If you wish to review these in far more detail, please visit the Information Commissioner's Office ("ICO") website, accessed at: www.ico.org.uk

4. WHAT IS 'PERSONAL DATA'

4.1 Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

4.2 Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4.3 The personal data that I use is set out in Parts 5.3 & 5.4.

5. WHAT PERSONAL DATA DO I COLLECT & PROCESS

5.1. OVERVIEW

Under the GDPR, I must always have a lawful basis for using your personal data. This may be because the data is necessary for my performance of a contract with you, because you have consented to my use of your personal data, or because it is in our legitimate interests to use it. Your personal data will be used for one of the following generic purposes:

5.1.1. Supplying my products and/or services to you.

5.1.1 Personalising and tailoring my products and/or services for you.

5.1.2 Communicating with you. This may include responding to emails, postal or electronic correspondence and/or calls from you

5.1.3 Supplying you with information that you may have opted-into. You may opt-out at any time by:

- Writing to me either by post or electronically (see my contact details under part 10), to instruct me to either amend, add or delete any part (or all), of your personal data...and
- By quoting the 'Opt-in' subject matter to which the amendment, addition and/or deletion applies.

5.2 USE OF YOUR PERSONAL DATA (General)

- 5.2.1 With your permission and/or where permitted by law, I may also use your personal data for marketing purposes, (but only that which includes contacting you by email, telephone, text message and/or post), with information, news and offers on either my products and/or services. You will not be sent any unlawful marketing or spam.
- 5.2.2 I will always work to fully protect your rights and comply with my obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity, to opt-out.
- 5.2.3 I will not be using any automated system for carrying out certain kinds of decision-making and/or profiling.
- 5.2.4 If at any point you wish to query any actions that might be construed as otherwise (as per this clause 5.2), then GDPR gives you the right to do so. Please contact me to find out more using the details in Part 10.

5.3 SPECIFIC USE OF YOUR PERSONAL DATA (Non-Sensitive)

- 5.3.1 Your name, address(es), next of kin details, date of birth, e-mail address(es), phone numbers, and any photographic, audio-visual and/or editorial medium as provided by consent, (through the 'Opt-in' documentation process), shall be collected for three purposes:
- The first, to perform my generic contractual obligations to you as either my Student and/or Client.
 - The second, to collect, process and/or store the information in accordance with the GDPR for legitimate use with Third Parties (see Part 8).
 - The third, for photographic, audio-visual and/or editorial inclusion on My Site, in Systema related Newsletters, Editorials; and/or Social Media Sites (Facebook, Messenger, Instagram, 'Whats App' and/or Tumblr).

5.4 SPECIFIC USE OF YOUR PERSONAL DATA (Sensitive)

- 5.4.1 Any medical conditions and/or disability data as provided by consent (through the 'Opt-in' documentation process); and/or any resulting financial information acquired during your attendance as either student or client, shall be collected for two purposes:
- The first, to perform my contractual obligations to you as either my Student or Client;
 - The second, to collect, process and/or store the data in accordance with the GDPR, for legitimate use with Third Parties (see part 8).

5.5 SPECIFIC USE OF YOUR PERSONAL DATA (Website)

- 5.5.1 My Site www.systemamidwessex.co.uk does not collect cookies; this renders me personally unable to directly collect, store or distribute any of your personal data, including for those purposes of marketing or profiling;
- 5.5.2 My Site's shop (supported through the e-commerce platform "ECWID") does not collect cookies through any action related to the buying or browsing of my products or services via My Site. ECWID stores information within the Browser's local storage – for unregistered customers the following non-personal data is stored:

- The number of items in the cart;
- The preferable category layout;
- The ID of the opened ECWID store.

If Customers add any product to the cart, the local storage will also contain:

- products added to the cart;
- the shipping address which is automatically detected by the IP

If customers go to checkout, the local storage will then add:

- the billing and shipping address entered during the checkout. For more details on this visit www.ecwid.com/forums/showthread.php?t=19235 If you seek to visit the ECWID website itself, then please read their privacy policy here: www.ecwid.com/privacy-policy

5.5.3 All photographic, audio-visual and/or editorial medium as provided by consent, (through the 'Opt-in' documentation process), which is uploaded and displayed within the website, is done so using Tumblr or Instagram – see part 7.3 for details.

5.5.4 Within My Site's Contact page, there is provision for making contact with me either by e-mail through using the Google platform ('reCaptcha' - see www.google.com/policies/privacy); or through Microsoft Outlook - see www.privacy.microsoft.com. Any use of these platforms is undertaken knowingly under those terms & conditions contained within their own Privacy Policies.

5.5.5. For details of My Site's own "Terms & Conditions", please visit www.systemamidwessex.co.uk

6. HOW LONG WILL I KEEP YOUR PERSONAL DATA?

I will not keep your personal data for any longer than is necessary considering those reason(s) for which it was first collected. Your personal data will therefore be kept for the following period(s), or, where there is no fixed period, the following factors will be used to determine how long it is kept. (This section shall be used in conjunction with Part 7 below).

6.1 Your name, address(es), next of kin details, date of birth, e-mail address(es), phone numbers, and all sensitive data as provided by consent, (through the 'Opt-in' documentation process); and any resulting financial information acquired by me during your attendance as either student and/or client, shall be kept (if) in paper format, for no longer than 6 months from the date of your last class/session attended; or until such time that your Insurance expires, (if this extends beyond the 6-month period). In this circumstance it will be kept for no longer than one year. The only purpose your personal data may be kept for longer is to fulfil HMRC legal requirements - in this case only financially associated paperwork will be kept, and for no longer than 7 years;

6.2 All computer and/or portable device created correspondence:

- containing your personal data (e-mails, texts and messages);
- and/or all personal data stored on electronic file (or parts there-of e.g. Excel, Word);
- and any resulting financial information acquired in electronic format during your attendance as either student or client;

shall be kept for no longer than 6 months from the date of your last class/session attended, or until such time that your Insurance expires if this extends beyond the 6-month period. In this circumstance it will be kept for no longer than one year. The only purpose your personal data may be kept for longer is to fulfil HMRC legal requirements - in this case only financially associated paperwork will be kept, and for no longer than 7 years;

- 6.3 All personal photographic, audio-visual and/or editorial medium, as provided by consent, (through the 'Opt-in' documentation process), shall be kept for no fixed period unless I receive a request from you within 6 months from the date of your last class/session attended, to remove your medium from my Site and/or newsletter/editorial and/or any social media site, where it is feasible and/or within my capability to do so.
- 6.4 In the event that any postal or electronic correspondence is received that includes any form of personal data without any 'Opt-in' documentation being consented to, then such correspondence shall be collected, processed and/or stored for no longer than 3 months.

7. HOW and WHERE DO I STORE OR TRANSFER YOUR PERSONAL DATA?

- 7.1 I will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.
- 7.2 Where I may transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that a third party provides data protection to standards of similar levels of data protection to those in Europe. More information on third party is available from the [European Commission](#).
- 7.3 The security of your personal data is important to me, and to protect your data, I take a number of specific measures; namely the following (to be used in conjunction with Part 6):

7.3.1 ALL PERSONAL DATA (excluding Photographic & Audio-Visual medium)

- All personal data (name, address(es), next of kin details, date of birth, e-mail address(es), phone numbers, sensitive data {medical conditions and/or disabilities}) as provided by consent, (through the 'Opt-in' documentation process); and/or any resulting financial information acquired in paper format during your attendance as either student and/or client; shall be stored under/within an appropriately locked environment at the sole trader's address.
- All personal data (name, address(es), next of kin details, date of birth, e-mail address(es), phone numbers, sensitive data {medical conditions and/or disabilities}) as provided by consent, (through the 'Opt-in' documentation process); which is then transferred into a computerised file format together; alongside any resulting financial information also acquired in electronic format during your attendance as either student or client; shall be stored only on my encrypted USB stick.

The transfer and storage encryption process will take place using my laptop; at no point will personal data be stored on mine or anyone else's portable device or computer. My encrypted USB stick will be stored under/within an appropriately locked environment at (my) sole trader's address.

- At no point will this USB encrypted stick leave the premises of Systema Mid Wessex unless there is a legitimate or lawful reason to do so.

7.3.2 PERSONAL DATA (Photographic, Audio-Visual and/or Editorial medium only)

- Any personal data which is of photographic, audio-visual and/or editorial medium(s), as provided by consent, (through the 'Opt-in' documentation process); that is uploaded & stored on social media sites, is protected under their own individual privacy policies and data regulation rules.
 - i. Facebook (including Instagram, Whats App & Messenger) currently comply with EU data protection law and will comply with the GDPR – Outside of the EEA, Facebook is certified under the Privacy Shield framework. For more information see www.Facebook.com

- ii. Tumblr (now part of 'Oath' itself a member of the 'Verizon' global company), currently has a European Privacy Policy in place; see www.tumblr.com
- Any personal data which is of photographic, audio-visual and/or editorial medium(s), as provided by consent, (through the 'Opt-in' documentation process, and other than that uploaded and stored on social media, shall be stored only on my encrypted USB stick. The transfer and storage encryption process will take place using my portable device and/or my laptop, but at no point will such photographic, audio-visual and/or editorial medium be stored on mine or anyone else's computer. My encrypted USB stick will be stored under/within an appropriately locked environment at (my) sole trader's address.

7.3.3 PERSONAL DATA USE WHEN USING THE INTERNET

- Any personal data which is held in text format within 'Messages' (as used by me), is owned by Apple, which has its own Privacy policy; see www.apple.com
- Any personal data which is held by me in e-mail format within my password protected Outlook 365 application, is owned by Microsoft Ltd. which complies with EU data protection law and will comply with the GDPR; see www.microsoft.com
- When using portable devices (my Apple phone) or computer devices (my Windows {Microsoft} laptop), any use of the Internet while collecting, processing and/or storing your personal data, will be restricted to non-Cloud-based, secure internet access. This means that any personal data that may be held electronically is protected and not liable to possible public breach or scrutiny, either by individuals and/or public/private bodies'.

7.4 In the event that any postal or electronic correspondence is received that includes any form of personal data, (without any 'Opt-in' documentation being consented to), then those measures outlined within this part 7.0 will apply.

7.5 Under the GDPR, photographic and audio-visual medium (including that contained within any editorial medium), may in some instances constitute a form of personal data, which when processed allows for "the unique identification or authentication of a natural person" to occur. Any photographic or audio-visual medium used by me for legitimate interests, which allows the unique identification or authentication of such individual(s), will only be done so through the individual(s), as provided by consent through the 'Opt-in' documentation process.

Operating within the parameters of legitimate interest as documented in GDPR legislation, the disproportionate effort in providing privacy policy information to any non-Systema Mid Wessex students and/or clients who may appear in such photographic or audio-visual medium(s), is beyond my practical capability & capacity, thus rendering it infeasible to do so.

8. DO I SHARE YOUR PERSONAL DATA?

8.1 I may sometimes contract with the following third parties to supply products and/or services to you on my behalf. In some cases, those third parties may require access to some or all your personal data that I hold.

- **IMASA** (Independent Martial Arts Sports Association): This association acts as a Third Party in managing and setting up your martial arts insurance. The personal data details they require of you are only Name and Date of Birth. Such data is provided to them by electronic e-mail only. They comply with the GDPR. See www.imasa.com

- **Towergate Insurance** (trading name of Towergate Underwriting Group Ltd.): This Insurance company uses those personal details provided by IMASA, to insure you to undertake self-defence classes and/or 1:1 personal sessions. Such data is provided to them by IMASA through either electronic and/or postal means.

- 8.2 If any of your personal data is required by a ‘third party’, as named above, I will take steps (as appropriate for me to undertake), to ensure that your personal data is handled safely, securely, and in accordance with your rights and my obligations, and the third party’s obligations under the law, as explained above in Part 7.
- 8.3 No personal data except of photographic, audio-visual and/or editorial medium(s), shall be explicitly uploaded to any social media site (as listed in 5.3.1.) by me, without your prior explicit permission(s). I have no legal or commercial reason to upload such details that may contain either your address(es), next of kin details, date of birth, e-mail address(es), phone numbers and/or sensitive data (medical or disability).
- 8.4 If any personal data is transferred outside of the EEA, I will take suitable steps to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 7.
- 8.5 In some limited circumstances, I may be legally required to share certain personal data, which might include yours, if I am involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

9. HOW CAN I ACCESS MY PERSONAL DATA?

- 9.1 If you want to know what personal data I hold about you, you can ask me for details of that personal data (including where any such personal data is held) and for a copy of it. This is known as a “subject access request”.
- 9.2 All “subject access requests” should be made in writing and sent to the email or postal address(es) shown in Part 10. To make this as easy as possible for you, a “Subject Access Request Form” is available for you to use. You do not have to use this form, but it is the easiest way to tell me everything I need to know to respond to your request as quickly & efficiently as possible.
- 9.3 There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover my administrative costs in responding.
- 9.4 I will respond to your subject access request within one month of receiving it. Normally, I aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date I receive your request. You will be kept fully informed of my progress.

10. HOW DO I CONTACT YOU?

To contact me about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of ‘Robert Hodgkinson’):

Email address: rob@systemamidwessex.co.uk.

Telephone number: 07912-174612.

Postal Address: c/o 21 Webster Road, Teg Down, Winchester, SO22 5NT

11. CHANGES TO THIS PRIVACY POLICY

I may change this privacy policy from time to time. This may be necessary, for example, if the law changes, or if I change my business in a way that affects your personal data protection.

Any changes made to this privacy policy will be communicated:

- Via the bi/monthly newsletter that is sent to all students / clients who have attended class / sessions within 6 months of publication; by post or electronically (e-mail);
- Directly through postal or electronic correspondence, if there is any urgent legal requirement that necessitates immediate communication.

SYSTEMA MID WESSEX