

DATA PROTECTION POLICY (PRIVACY POLICY) FOR VIPASSANA TRUST

This document describes the collection, creation, storage and use of personal data relating to applicants and participants on courses in Vipassana Meditation arranged by Vipassana Trust. These courses take place at Dhamma Dipa, Dhamma Padhana, Dhamma Sukhakari and other locations in the UK. It also describes how we use Cookies and Google Analytics on our website.

The controller, processor and owner of the data is Vipassana Trust (referred to as the Trust):

- Company registration number: 2246810
- Registered Charity No: 327798
- Address: Dhamma Dipa, Pencoyd, St Owens Cross, Hereford HR2 8NG

The Trust is committed to ensuring that the privacy of all applicants and participants on courses (hereafter collectively called Students) is protected. This Privacy Policy explains what information about a Student we collect and how we may use and disclose it, and the procedures that we have in place to safeguard the Student's privacy.

Whenever you give us personal data, you are consenting to its collection, use, storage, disclosure and transfer in accordance with this Privacy Policy.

The terms Data Protection Policy and Privacy Policy are used interchangeably.

1. Definition of the Data

The personal data that we collect could be contained in any of the following documents if you choose to register for a Vipassana Meditation course:

- i. Students'/Dhamma servers' online or paper Application Form
- ii. Students'/Dhamma servers' Registration Form completed on arrival at the centre
- iii. Medical Questionnaire
- iv. Incompatible Practices Questionnaire
- v. Teachers of Other Techniques Questionnaire
- vi. Further correspondence between Registrars or Assistant Teachers and Students, medical staff, therapists, relatives or nominated supporters of Students; notes of conversations with any of the above.

This information will be referred to in this document as the Data.

In addition the Assistant Teachers may make notes about the individual experience of some students on the courses that are stored centrally. These will be referred to as the AT Notes.

2. Definitions of Other Terms

Assistant Teacher: Anyone who has been appointed by S.N. Goenka, or his representatives, to conduct Vipassana Meditation courses, including Teachers

Student: Anyone who applies to or attends a Vipassana Meditation course led by an Assistant Teacher to S.N. Goenka

Old Student: Anyone who has completed a Vipassana Meditation course under S.N. Goenka or one of his Assistant Teachers

Registrar: An Old Student asked by an Assistant Teacher or the Trust to process Application Forms, Medical Questionnaires, Incompatible Practices Questionnaires and/or Teachers of Other Techniques Questionnaires for a Vipassana Meditation course and to correspond with Students

Registration Desk Server: an Old Student who has been asked by the Centre Manager to receive Registration Forms on Day 0 on arrival at the course site and to pass them to the Assistant Teacher

Course Manager (Male or Female Manager): an Old Student who has been asked by an Assistant Teacher to manage some aspects of a Vipassana Meditation course

Centre Manager: an Old Student who has been asked by the Trust or an Assistant Teacher to perform management tasks for the Trust

Server: an Old Student who is helping on a course or at a centre

Forms: includes Application Forms and Registration Forms and answers to any of the questionnaires listed above

Registration Office: a room at Dhamma Dipa dedicated to registration activities and to which there is restricted access via a keypad

Translator: an Old Student who is asked by an Assistant Teacher or Registrar to translate information on Forms for use by the Assistant Teacher or Registrar

3. Purposes of Collecting and Storing the Data

- i. To enable the Assistant Teacher or Registrar on his/her behalf to assess if a Student is suitable to be accepted for a course.
- ii. To enable the centre management to plan accommodation, food and sometimes transport for the Student.
- iii. To enable proper guidance and assistance to be given to the Student prior to, during and after a Vipassana Meditation course.
- iv. To provide a record of Students who have attended courses arranged by the Trust.
- v. For legal reasons.

4. Information about Other People which You Provide to the Trust

If you provide personal information to us about someone else (such as the contact details of your emergency contact person), you must ensure that you are entitled to disclose that information to us and that, without our taking any further steps, we may collect, use and disclose that information as described in this Privacy Policy.

5. Viewing of Data

Assistant Teachers, Children's Course Teachers, Registrars, Registration Desk Servers, Course Managers and Centre Managers have access to the Data on a "need to know" basis only as follows:

- i. The Application Form is read by the Registrar(s), the Assistant Teacher(s) conducting the course or another Assistant Teacher who reviews Forms in order to give approval for acceptance to a course. A Translator may translate the Data where necessary.
- ii. The Medical Questionnaire is read by the Assistant Teacher(s) conducting the course or another Assistant Teacher who reviews Forms in order to give approval for acceptance to a course. A Translator may translate the Data where necessary.
- iii. The Incompatible Practices and Teachers of Other Techniques Questionnaires are read by the Registrar(s), the Assistant Teacher(s) conducting the course or another Assistant Teacher who reviews Forms in order to give approval for acceptance to a course. A Translator may translate the Data where necessary.
- iv. The outside pages of a Registration Form (pages 1 and 4) may be read by an Assistant Teacher, Old Students approved to do so by an Assistant Teacher, in particular the Course Manager, the Registration Desk Servers or the Registrars.
- v. The inside pages of a Registration Form (pages 2 and 3) are read by an Assistant Teacher or a Children's Course Teacher. A Translator may translate the Data where necessary.

The Trust never makes personally identifiable information available to third parties, for commercial or any other reasons. We do not disclose your confidential information outside organisations authorised to offer Vipassana courses as taught by S.N. Goenka and their common infrastructure except when required to do so by law, for example, in response to a court order or subpoena. However, in case of an emergency, we may disclose personal information for medical reasons or in response to a request from a law enforcement agency.

Applications submitted by e-mail may be at risk of being seen by third parties when sent over the internet, as we cannot guarantee that our e-mail application facilities are secure. Please do not use the e-mail application facility on our websites unless you are personally prepared to take this risk.

6. Storage of Data

The Data is maintained in confidence. It is safeguarded against disclosure to or access by third parties once it reaches the centre or the Registrar.

Electronic data is stored in accordance with EU regulations on data protection.

Electronic Forms are printed out before the start of the course. Any paper Forms are added to these. All Forms are stored in the Registration Office in a locked filing cabinet until they are handed over to the Assistant Teacher(s) before the course.

During the course, all the Forms are kept in the Assistant Teachers' residences. The keys to the residences are only available to the Assistant Teacher(s) and the Centre Managers.

At the end of the course, any changes in information are recorded and the Forms are returned to the Registration Office. An end-of-course summary report is produced. The Forms are filed in boxes and stored in the Registration Office in a locked cupboard. Only Assistant Teachers, or at times a Centre Manager or Registrar acting under instructions from an Assistant Teacher, can access them. They are stored in folders, arranged by the date of the course.

7. Destruction of Data

The Data held in electronic form is destroyed after approximately 90 days. No backup is made and it is not recoverable by the Trust. A record is kept for all participants who complete a course. This contains the participant's name, date of birth, gender, address, email address, telephone number, partner's name, course dates and types of courses that the participant has attended.

The Forms are destroyed after seven years.

The Forms and Disclosure & Barring Service data for students and servers on children's courses are destroyed after fifty years.

8. Instructions Given to Those with Access to the Data

Assistant Teachers: The following text is used to ensure that Assistant Teachers know how to deal with the Data:

"The Application Forms, the correspondence with students and the Registration Forms may contain sensitive data about students and servers. This should be treated as confidential and not given to others. However, in the case of an emergency you may disclose relevant information for medical reasons or personal information in response to a request from a law enforcement agency."

Registrars and Centre Managers: The following text is used to ensure that Registrars and Centre Managers know how to deal with the Data:

"The Application Forms, the correspondence with students and the Registration Forms may contain sensitive data about students and servers. Such data should not be given to anyone other than an Assistant Teacher or a Translator."

Only Assistant Teachers and Translators who have the permission of Assistant Teachers may read pages 2 and 3 of the Registration Forms. You are not permitted to do so.

Data that students supply may be entered into the registration system for Registrar and Assistant Teacher use. This data is password-protected. All data is automatically removed approximately 90 days after the end of a course except the student's name, date of birth, gender, address, email address, telephone number, partner's name, course dates and types of courses that the student has attended.

The Forms of and correspondence with non-participants should be destroyed at the end of each course.

At the end of each course, the Forms and correspondence should be stored securely. Forms for any courses that took place more than 7 years ago should be completely destroyed without their contents being read or copied.

Student data may never be used for commercial purposes. It may be shown to the student who supplied it under certain circumstances as described in the Data Protection Policy."

Course Managers and Registration Desk Servers: The following texts are used to ensure that Course Managers and Registration Desk Servers know how to deal with the Data:

"To maintain confidentiality, those on the registration desks must not look inside the forms and should fold any that the students themselves have not folded."

"The Registration Forms may contain sensitive data about students and servers. Only Assistant Teachers and Translators who have the permission of Assistant Teachers may read pages 2 and 3. You may only read pages 1 and 4."

Translators: The following text is used to ensure that Translators know how to deal with the Data:

"The Application Forms, the correspondence with students and the Registration Forms may contain sensitive data about students and servers. You may only provide a translated version of what is in the forms as requested by the Assistant Teacher or a Registrar. You must never retain any data yourself or convey any data to anyone other than the Assistant Teacher or a Registrar."

9. AT Notes

The Assistant Teacher(s) may record notes referring to an individual student's experience on a course on a separate database. This is maintained by an Assistant

Teacher appointed to fulfil this task by S. N. Goenka or his representative. The data is kept strictly confidential and is accessible only to Assistant Teachers to support students on future courses, and in rare cases to restrict students from attending future courses.

Each Assistant Teacher is responsible for the entries that they make and is the owner of that data.

10. Rights of Access of Students and Servers to their own Data

If you believe that the Trust has stored data that you have provided, you may view a copy of that data if it actually exists. To do this, you must provide the Trust with your name and the start date of the course which you applied for in writing, together with suitable identification (for example a copy of a driving license). For courses which took place anywhere in the UK, the request should be made to the Registration Office at Dhamma Dipa.

When you have identified yourself satisfactorily, the Registration Office will reply to your request within at most thirty days with either a copy of the data, or an explanation as to why it cannot be made available to you, in line with the Data Protection Act.

If you wish to correct data about yourself which is held by the Trust, we may ask you to provide a copy of the data as currently held (obtained as described above) and a written request containing the changes you would like made. You will receive a reply within thirty days as to whether or not the changes are accepted. This decision will be made by an Assistant Teacher. If the changes are not accepted then the reasons for non-acceptance will be given.

11. Additional Databases

The Trust invites Old Students to subscribe to e-mail lists including its newsletter and regular information updates. If you no longer wish to receive these e-mails, please use the unsubscribe option.

12. Cookies

A "cookie" is a text file containing a small amount of information which our server downloads to your personal computer when you visit our website. The file contains a unique number so that our server knows which computer it is talking to.

Some cookies are allocated to your computer only for the duration of your visit to a website, and these are called session-based cookies. These are automatically deleted when you close your browser.

We create a session-based cookie when you use our online Application Form to register for a course. We also use a session-based cookie to know whether you have logged in as an Old Student or not.

13. Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

14. Effective Date

This Privacy Policy is effective as of 23 November 2014. We reserve the right to modify the terms of this policy at any time and at our sole discretion.

15. Queries about this Privacy Policy

If you would like to contact us with any queries relating to this Privacy Policy, please email info@dipa.dhamma.org or send a letter to Vipassana Trust.