



## Data protection policy

This policy sets out how 'the menopause course' handles the personal data of its employees, customers, suppliers and other third parties.

This policy is intended to ensure that we:

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- Comply with data protection law and follow good practice.
- Protect the rights of colleagues, customers and partners.
- Are transparent about how we store and process individuals' data.
- Are protected from the risks of a data breach.

Protecting the confidentiality and integrity of personal data is a critical responsibility that we take seriously. This policy is therefore intended to apply to the personal data that we process. Usually this is restricted to name, email and postal address, telephone number and place of work. We have no reason to collect other data and will only request it if for a specific purpose.

### Scope

This policy applies to all personal data that we process regardless of the media on which that data is stored, or whether it relates to co-workers, customers, suppliers, or any other data subject. Most usually it will apply to those registering to participate in a course.

### Data protection principles

We adhere to the principles relating to the processing of personal data, as set out in the GDPR. These require personal data to be:

- Processed lawfully, fairly and in a transparent manner.
- Collected only for specified, explicit and legitimate purposes ("purpose limitation").
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed ("data minimisation").
- Accurate, and where necessary, kept up to date ("accuracy").
- Not kept in a form which permits identification of data subjects for longer than is necessary ("storage limitation").

- Processed in a way which ensures its security, using appropriate technical and organisational measures to protect against unauthorised or unlawful processing, and against accidental loss, destruction or damage (“integrity and confidentiality”)

In addition to these 6 core principles there are other obligations on us (as the controller of your data) and rights that you have in relation to your data (as data subject). These include requirements that your personal data is:

- Not transferred to another country without appropriate safeguards in place; The menopause course does not transfer data to other countries, except if you register from outside the UK, when we will use the email address you have provided to provide course registration information.
- Made available to data subjects, who must be allowed to exercise certain rights in relation to their personal data.

## Fair, lawful and transparent processing

We process your personal data lawfully, fairly and in a transparent manner.

What this means is that we can only process your data fairly and lawfully and for one of the specified purposes (or legal bases) set out in the GDPR. These include the following:

- The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Processing is necessary for compliance with a legal obligation to which the controller is subject.
- Processing is necessary in order to protect the vital interests of the data subject or of another natural person.
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; or
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

We will only use your data in relation to courses and course delivery. We will not pass on your data to any third party.

## Consent

- We can only process personal data on the basis of one or more of the lawful bases set out in the GDPR and listed above – for us this is – *The data subject has given*

*consent to the processing of his or her personal data for one or more specific purposes; (ie participation in a course).*

- By booking onto any courses provided by 'the menopause course', you consent to the necessary data being used for that purpose.
- You can withdraw consent at any time by emailing [admin@themenopausecourse.com](mailto:admin@themenopausecourse.com).

## Accountability

As a sole trader, I am the Data Controller (or simply Controller) for your data. I am responsible for implementing appropriate technical and organisational measures to ensure compliance with the data protection principles detailed above and for ensuring GDPR compliance.

## Purpose Limitation

When we collect personal data, it must be only for explicit and legitimate purposes that are clear up front. We may not process the data in any manner that is incompatible with these purposes.

If the purposes for data collection and processing change, then we must inform you of these new purposes, and if necessary, we must gain their renewed consent.

## Data Minimisation

The data that we collect, and process must be limited to what is strictly necessary and relevant for the intended purposes. When any data is no longer needed for these purposes, we will then delete.

## Accuracy

We check the accuracy of any personal data at the point of collection, and will correct it if needed.

## Storage Limitation

Personal data will not be kept in an identifiable form for any longer than is necessary for the stated purposes for which the data is processed. Therefore, we ensure that when personal data is no longer needed, it is deleted.

## Integrity and Confidentiality

We secure personal data by taking organisational measures against unauthorised or unlawful processing, and against accidental loss, destruction or damage. We do not use

encryption or pseudonymisation. Data is kept within a password secured environment accessed only by those who need to use the data.

## Personal Data Breaches

Should a breach of personal data occur, we will usually notify the appropriate regulator (unless it is assessed that the breach is unlikely to result in a risk to the rights and freedoms of individuals) and, in certain instances, the data subject. We are also obliged to keep a record of all personal data breaches.

## Data subjects' rights

The people whose data we hold (data subjects) have many rights regarding the processing of their personal data. These include, but are not limited to, the following rights to:

- Withdraw consent to the processing of their personal data.
- Request access to their personal data that the company holds.
- Prevent our use of their personal data for direct marketing purposes.
- Ask us to erase any personal data that is no longer necessary for us to hold.
- Ask us to correct any inaccurate or out-of-date data.
- Prevent processing of data that is likely to cause damage or distress to the data subject or to anyone else.
- Be notified of a data breach which is likely to result in high risk to their rights and freedoms.

## Direct marketing

We are subject to certain rules and privacy laws when marketing to our customers. Customers generally need to give us their consent for us to send them electronic direct marketing communications, for example via email. If a customer opts out of receiving direct marketing communications, we must honour their request promptly.

## Sharing personal data

We do not share personal data outside the organisation.