

Ruskin Apothecary + School of Intuitive Herbalism

(Trading names of Wild Healing Ltd)

Data Protection Policy Statement and Procedure

Ruskin Apothecary and The School of Intuitive Herbalism are required to hold, maintain and process certain personal data about participants for the purposes of satisfying its operational and legal obligations.

Overview of our approach to data collection, storage and use:

- ✦ We keep to a minimum the amount of information we hold about you. This amount should be adequate, relevant and not excessive for those purposes; and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements.
- ✦ We use your data to respond to your enquiries about our services (the lawful basis for this is "Consent") and to provide our services to you (the lawful basis for this is "Contract").
- ✦ We delete your data when it is no longer needed or on request from you (with the exception of data we are obliged to keep for legal reasons)
- ✦ We apply appropriate security mechanisms to protect your personal data.
- ✦ Information is processed accordance with the data subject's rights, and ensuring that the rights of people about whom information is held can be fully exercised.
- ✦ Information is not transferred to any country outside of the European Economic Area, unless that country has equivalent levels of protection for personal data or we have your explicit consent.
- ✦ We have in place methods for detecting and dealing with breaches of security including the ability to identify which individuals have worked with specific data and having a proper procedure in place for investigating and remedying breaches of data protection procedures.
- ✦ We have a secure procedure for backing up and storing back-ups separately from originals.
- ✦ We have a secure method of disposal for back-ups, disks and printouts.
- ✦ We keep data for no longer than 7 years from when we have last had contact from you.

Type of data collected may include:

- ✦ Names, addresses, e-mails and phone numbers
- ✦ Personal features (on photographs and pictures taken in class settings)
- ✦ Application forms for classes which included age range and information you have offered about yourself for the sake of your application.
- ✦ Full Medical records if attending the clinic
- ✦ Brief Medical records for those purchasing 'over the counter' simples or medicines
- ✦ Dates of birth
- ✦ Our website only collects standard fixed cookies
- ✦ We retain a simple log of attendees on courses and dates of applications to allow us to chart a student's progression through our program. This information is never shared with anyone else without your express consent.

We guarantee to delete *any individual piece* or *all* of the information we hold about you on request.

Sharing data:

We do not share your data with anyone without your consent. The only exception may be in a serious or life threatening health condition / accident where such information is crucial to receiving appropriate and quick care.

Data Security

The need to ensure that data is kept securely means that precautions must be taken against physical loss or damage, and that both access and disclosure must be restricted. We adhere to the following principles of data security:

- Prevent unauthorised access to personal or sensitive data, whether in paper or electronic form;
- Ensure its method of storing personal or sensitive data in any form is secure including the keeping of sensitive data in a secure room or secure lockable storage device and controlling access by personnel to such locations where data is stored;
- Ensure the hardware and software used in processing the data is reliable and protected against viruses and other electronic intruder devices;
- Put password protection on computers and central server systems on which data is stored and ensure that only authorised personnel are given details of the relevant password(s);
- Prevent computer screens from being overlooked by unauthorised persons;
- Ensure that all individuals who have access to the data are reliable and are trained how to comply with the Act;
- Have in place methods for detecting and dealing with breaches of security including the ability to identify which individuals have worked with specific data and having a proper procedure in place for investigating and remedying breaches of data protection procedures;
- Have a secure procedure for backing up and storing back-ups separately from originals;
- Have a secure method of disposal for back-ups, disks and printouts. Processing any personal data, all staff should consider the checklist set out below:

Student and Apprentice obligations

- Students are advised at registration about the information that the school will collect, use and retain about them, and those to whom such information will be disclosed. Learners must ensure that all personal data provided are accurate and up to date. They must ensure that any changes, of address, for example, are notified. The School cannot be held accountable for errors arising from changes about which it has not been informed.
- Learners who come into contact with personal data through the School for the purposes of research or study, in pursuit of an academic programme or qualification and under the direct supervision of a member of staff will be covered by the Wild Healing Ltd's notification to the Information Commissioner. In such cases, staff must notify students about, and students must abide by, the relevant provisions of this guidance.
- The School of Intuitive Herbalism is not responsible for notification of personal data processed by students for their own use. Personal information is not disclosed either orally or in writing, intentionally or otherwise to any unauthorised third party. (Unauthorised disclosure might be a disciplinary matter initially requiring advise and a caution)

Right of Access to Information

All individuals who are the subject of personal data held by us are entitled to:

- Ask what information we holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed what we are doing to comply with Data protection obligations.

Any individual with the right to access personal data relating to him / her which is held by us. This applies to data held electronically and also manual records that are held in a relevant filing system. Any individual who wishes to exercise this right should make the request in writing to Nathaniel Hughes. The requested information will be provided within 40 days of receipt of the completed form, unless there is sufficient reason for delay. The right of access applies to all individuals for whom we hold personal data.