



# UNIVERSAL HEALING TAO® System



## Privacy Policy & Data Protection Statement

---

**Practitioner and Instructor Training - All training sections and training levels with and without the use of Case Study Forms within the Universal Healing Tao System®**

### **- Privacy Policy and Data Protection Statement-**

Each Universal Healing Tao Senior Instructor or Senior Teacher ("UHT Instructor") respects the privacy rights of individuals and is committed to handle personal information responsibly and in accordance with applicable law. This document sets out the personal information that may be collected and processed during the term of your training to become a Practitioner or Instructor in a specific training program of the Universal Healing Tao System, the purposes of the processing and the rights connected with it.

The respective educating UHT Instructor holds personal data of the trainee person ("Trainee") to provide an educational service. Each UHT Instructor is committed to use and process data in accordance with the responsibilities and requirements under the General Data Protection Regulation (GDPR).

Each UHT Instructor shall take responsibility for the ongoing compliance with this policy and shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. The respective UHT Instructor is a "data controller". This means that she/he is responsible for deciding how personal information about the Trainee is held and used.

This statement summarises the personal data the respective UHT Instructor may retain, process and share. Under data protection legislation it is required to notify you of the information contained in this Notice. This Notice applies to current and former Trainees.

### **Data protection principles**

Article 5 of the GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

Each UHT Instructor is committed to ensure that your information is always secure, accurate and relevant. To prevent unauthorised access or disclosure suitable physical, electronic and managerial procedures are implemented to safeguard and secure the personal data provided to the UHT Instructor.

## **The types of personal information the UHT Instructor may process include:**

- Identification data – such as name, gender, photograph, date of birth
- Contact details – such as home and business address, telephone/email addresses
- Employment details – such as job title/position, practice location
- Background information – e.g. academic/professional qualifications, education, CV
- Spouse information, marital status

## **Purposes for processing personal information**

The legal basis for collecting and using personal information described above will depend on the personal information concerned and the specific context in which it is collected. However, usually personal information will only be collected where you have given your consent to do so, where personal information is needed to perform a contract i.e. provision of services for the educational training and evaluation, or where the processing is in the respective UHT Instructor's legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms.

In some cases the UHT Instructor may have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your interests or those of another person.

Each UHT Instructor shall ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed without authorisation and only accessed or used for specific legal purposes.

## **Sensitive personal data and so called Case Study Forms within all training areas of the UNIVERSAL HEALING TAO® System, such as Basic, Chi Nei Tsang, Cosmic Healing, Internal Martial Arts, Inner Alchemy & Immortality and Inner Alchemy Astrology**

Generally the UHT Instructor will always try to collect or process as less as possible sensitive personal data relating to Trainees and their training to become a Practitioner or Instructor. In some circumstances the UHT Instructor may need to collect some sensitive personal data as part of her/his service provision to provide an educational training, for example sensitive data for the purposes of health assessment such as information about your health, including any medical condition, health and sickness records. The UHT Instructor will only collect and process your sensitive information in ways for which you have given your prior explicit written consent.

The so called Case Studies forms filled out by Trainees in the course of the training to become a Practitioner and submitted to their respective UHT Instructor may include personal (and/or sensitive) data concerning third parties. **We strongly advise each Trainee to always observe and comply with the legal regulations valid in the specific country in terms of privacy protection before submitting any completed Case Study Forms containing personal and sensitive data and information concerning third parties (for example students) to be reviewed by your UHT Instructor, i.e. such as a prior written explicit consent of the involved person.**

## **With whom information may be shared**

The UHT Instructor takes care to allow access to personal information only to those who require such access in the course of your training to become a Practitioner of the Universal Healing Tao, and to third parties who have a legitimate purpose for accessing it to support these purposes.

Whenever the respective UHT Instructor permits a third party to access personal information, she/he will implement appropriate measures to ensure the information is used in a manner consistent with this notice and that the security and confidentiality of the information is maintained.

**The UHT Instructor may also share personal information to third parties on other lawful grounds, including:**

- To comply with legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process
- In response to lawful requests by public authorities
- As necessary to establish, exercise or defend against potential, threatened or actual litigation
- Where necessary to protect the vital interests of the respective UHT Instructor

**Transfer of personal information abroad**

The UHT Instructor may need to transfer personal information to countries other than the one in which the information was originally collected, i.e. in case of different residences of UHT Instructor and Trainee. When personal information is exported to a different country, steps will be taken to ensure that such data exports comply with applicable laws. For example, if personal information from the European Economic Area to a country outside it is transferred, such as the United States, an appropriate data export solution such as entering into EU standard contractual clauses with the data importer or taking other measures to provide an adequate level of data protection under EU law shall be implemented.

**Data retention periods**

Personal information will be stored in accordance with applicable laws and kept only for as long as needed to carry out the purposes described in this policy, the provision of service in regard to the respective Practitioner training or as otherwise required by applicable law.

**Data privacy rights**

The following rights are available under applicable data protection law:

- Access, correct, update or request deletion of personal information
- Object to processing of personal information, asking the UHT Instructor to restrict processing of personal information or request portability of personal information
- If the UHT Instructor has collected and processed personal information using a person's consent then this can be withdrawn at any time. Withdrawing consent will not affect the lawfulness of any processing conducted prior to withdrawal nor affect processing of personal information conducted in reliance on lawful processing grounds other than consent
- The right to complain to a data protection authority about our collection and use of personal information.

The respective UHT Instructor will respond to all requests received from individuals demanding to exercise their data protection rights in accordance with applicable data protection laws.

**Updates to this policy**

This policy is created on the lawful base of GDPR regulation and is dated 4th of April 2021 may be updated periodically to reflect any necessary changes in the privacy practices during the course of your training to become a Practitioner in a specific training program of the Universal Healing Tao System. In such cases an updated version of this document will be available on the website <https://www.universaltaoinstructors.com>. Trainees are encouraged to check this notice periodically to be aware of the most recent version.