# **Privacy Policy - The Soul Space**

# **This Policy**

We, The Amanpuri Soul Space, company registration number 559194-9754, ("The Soul Space"), respect your privacy. Our intention is to make you feel safe when we process your personal data and all processing is carried out in compliance with applicable law.

This Policy explains how we may process your personal data. The Policy may be amended or updated from time to time, so please check it regularly for updates.

## Collection and creation of personal data

We may collect or obtain personal data directly from you: (i) when you contact us and inquire about a retreat; (ii) if you book a retreat with us; (iii) if you sign up for to our subscription list, (iv) when you make your Personal Data public e.g., if you make a public post on social media; and (v) if you visit our website.

In order to optimize your experience of our website, we also use cookies that may contain personal data. You can read more about how we use cookies in our cookie policy. [länk]

We may also create personal data about you, such as lists including information about age, food allergies and health data.

# **Categories**

We may process the following categories of Personal Data: your personal details (e.g., your name); demographic data (e.g., your age, gender); your contact details (e.g., your address, e-mailadress); records of your consents to our Processing of your Personal Data; payment details (e.g., your billing address); information about your use of our Sites and Apps (e.g., [sparas detta Josse]?); information about your interactions with our content or advertising; and any views or opinions you provide to us, (e.g. if you publicly post about us on social media platforms).

### **Sensitive Personal Data**

Where we need to process your Sensitive Personal Data for a legitimate purpose, we do so in accordance with applicable law.

### **Purpose and Legal Basis**

The Soul Space handle your personal data to best provide you with the services we offer. We process Personal Data for the following purposes: providing our website; operating our business; communicating with you; managing our IT systems; financial management; ensuring the security of our systems and when you join one of our retreats; compliance with applicable law; and recruitment and dealing with job applications.

Purpose	Legal Basis
<b>Providing our website</b> to offer our services.	The Processing is <b>necessary</b> when you want to sign up for a retreat with us. Further, we have a <b>legitimate interest</b> in carrying out the processing for the purpose of providing our website (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

## **Purpose**

## **Legal Basis**

**Operating our business** by handling your booking details

The Processing is **necessary** in connection with any contract that you have entered into with us to manage your booking and prepare for your retreat with us.

Communication and marketing by newsletters, welcome/information letter (email, telephone, social media, post or in person) The Processing is **necessary** in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us, or when we have obtained your **prior consent** to the processing.

Managing our IT-systems

The Processing is **necessary** for compliance with a legal obligation. We also have a **legitimate interest** in carrying out the Processing for the purpose of managing and maintaining our communications and IT systems (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Financial management: sales; finance; tax.

We have a **legitimate interest** in carrying out the processing for the purpose of managing and operating the financial affairs of our business (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

**Security** of all our IT-systems, and physical safety when holding retreats

The Processing is **necessary** for compliance with a legal obligation.

Legal compliance: compliance with all our legal and regulatory obligations under applicable law The Processing is **necessary** for compliance with a legal obligation.

Recruitment and job applications: recruitment activities; offer details; and acceptance details.

The Processing is **necessary** for compliance with a legal obligation (especially in respect of applicable employment law), or, we have a **legitimate interest** in carrying out the Processing for the purpose of recruitment activities and handling job applications (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

We do not process your personal data for any other purpose that is incompatible with this purpose, and we only save the data for as long as it is necessary.

#### Retention

We do not save any of your personal data beyond what is necessary with regard to the purpose for the processing, unless the data must or may be stored longer according to law.

After you attended a retreat with us, we will save your name and email adress to our subscription list for further communication and marketing purposes. If you wish to be removed from this list, you can at anytime click on the unsubscribe link in the footer of any email you receive from us, or contact us at retreat@thesoulspace.com.

#### Third part access

We may disclose your personal data to: (i) legal and regulatory authorities; (ii) our processors; (iii) any partner at any of our retreats if necessary for the organisation of the retreats; and (iv) any third party providers of advertising, plugins or content used on our website.

When you book a retreat with us, we use Confetti as a bookingsystem. Confetti is responsible for

We will never sell your personal data to a third party.

## **Subscription list/newsletter**

By signing up to our newsletter/subscription list, you agree that the information provided (name and email adress) will be stored to fit the stated purposes; to provide you with information about our retreats and other updates.

We will save this information for as long as we continue to use email for marketing or until you specifically request removal from the list.

At any time you can change your mind by clicking on the unsubscribe link in the footer of an email you receive from us, or by contacting us at retreat@thesoulspace.com.

## **Data Security**

We have taken appropriate technical and organisational security measures to protect personal data against any accidental or unlawful loss, alteration, unauthorised disclosure or access, and other unlawful or unauthorised forms of processing, including erasing lists and emails as soon as possible.

## Your rights and accuracy

Under applicable law, you may have a number of rights. These rights include: (i) the right not to provide your personal data to us; (ii) the right of access to your personal data; (iii) the right to request rectification of inaccuracies; (iv) the right to request the erasure, or restriction of processing, of your personal data; (v) the right to object to the processing; (vi) the right to have your personal data transferred; (vii) and the right to withdraw your consent. We may require proof of your identity before we can give effect to these rights.

We take every reasonable step to ensure that your personal data are kept accurate and up-todate and are erased or rectified if we become aware of inaccuracies.

If you have any complaints regarding our processing of your personal data, you may file a complaint to the competent data protection authority. You can find out more about the local data protection authorities under the following link:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index\_en.htm.

#### **Contact details**

Your privacy is important to us at The Soul Space. If you have any questions about this Privacy Policy, or the processing of your personal data, please feel free to contact us at anytime.

The Amanpuri Soul Space Östermalmsgatan 67B 114 50 Stockholm Sweden retreat@thesoulspace.com.