

The International Sivananda Yoga Vedanta Centres, Canada

Data Privacy Policy

The International Sivananda Yoga Vedanta Centers Canada, comprising of the Ashram Yoga Camp (Quebec), Montreal Center (Quebec), Toronto Center (Ontario) and Ottawa Center (Ontario), Canada, hereafter referred as 'Sivananda Canada' are together committed to providing traditional knowledge, information and teachings on classical hatha yoga practices and philosophy.

Information is collected about individuals who sign up to our mailing list, who visit our website (www.sivananda.org), who participate in our events and/or apply for scholarships and volunteering at Sivananda Canada.

We are committed to protecting your privacy, and information will not be disclosed to third parties without your prior consent. Please note that there are certain aspects of this privacy policy that only apply when we are required to comply with specific laws (e.g., the European data protection law, the General Data Protection Regulation)

When do we collect personal information about you?

We may obtain your personal information from a number of sources including:

1. When you give it to us **directly**. For example, if you provide us with your email address to sign up to receive our news updates or sign up to attend one of our events, programs or courses.
2. When we obtain it **indirectly**. Your personal information may be shared with us by third parties such as recruitment agencies when we are recruiting staff and vetting agencies when we gather information on scholarship or other applicants.
3. When it is **publicly available**. Your personal information may be available to us from external publicly available sources. This includes information available on government and/or institutional websites (such as bios).
4. When you visit our **website**. Our website uses tracking technologies to improve your experience of our website—this can involve collecting personal information.

What personal information do we use?

We may collect, store, and otherwise process the following kinds of personal information:

- your full name and contact details, including email address, postal address, and telephone number;
- profile information and username if you register on our website;
- information you provide in connection with your application for courses, staff, scholarship or volunteering which may include date of birth, biographical information, education and work experience, information about family members, employment information, citizenship and immigration/residency information, passport, dietary information and information about your participation in a specific program;

- information you provide when you are considered for a board / advisory council / complaints committee role which may include education and work experience, information about family members, employment or specialization information, potential conflicts of interest, and expenses.
- information you provide when you are considered as a contractor / vendor which may include education and work experience, employment information, images of your signature on contracts, and information about the services you may provide to Sivananda Canada;
- information about your use of our information and communications, social media systems;
- financial information including bank details, payment card details which we keep only for a three months period. After this period in case refunds are to be processed, we will seek the information once again.
- your communication preferences;
- information about your professional status and role; and
- information you provide to us through Forums (see below).

What information do we collect automatically online?

We will also collect certain information automatically every time you interact with our website. We do this through server log files and pixel tags. While the information obtained may not be personal information under the laws of the country you are based in, we recognize that there are certain laws (e.g., EU law) where this information is likely to be personal information.

For instance, we identify and log the Internet Protocol (IP) address of the device you use to access our website automatically in our server log files whenever you visit our website, along with the time of your visit and pages you visit. The intention of such a practice is to calculate website usage levels and to help us diagnose problems with the website's servers.

Also, we use third party vendors like Survey Monkey, Retreat Guru, Mail Chimp, Instagram, Facebook etc, for various online services, and they collect data from registrations towards input and analytics. These data are regularly used by them and presented to us in the form of analytics. While we peruse the data numbers presented to us, and demographics and analysis therein, the personal databank rests with the vendors and we do not use these.

Example: Signing up to our newsletter is free. To provide you with this service, Sivananda Canada works with Mailchimp, a well-known third-party marketing automation platform that is guided by its own privacy policy. The sign-up form requests some personal information, including your name, profession, country and email address. This data sits on the Mailchimp rather than Sivananda Canada servers, and is password protected for security. You can select your preferences or unsubscribe at any time.

Online classes and workshops: We may be using several platforms for conducting online classes, meeting and workshops. Zoom is one such platform, which we take as an example here to detail out the data processing by Zoom and us. Sivananda Canada is responsible for holding some data for these online meetings and workshops. However, Zoom is the data processor, as Sivananda Canada will be using the provisions and applications that Zoom allows a subscriber to use.

Sivananda Canada subscribes to the services of Zoom and sets up classes and meetings. Any participant will be able to access the classes/workshops by downloading the app or accessing the website or by accessing the meeting links that we share with the registrants or participants of the classes/workshops.

The user data that are processed while using Zoom app to access our courses / classes and workshops are the following, however this list is not exhaustive, as the app and its uses gets updated often by the service provider. Various kinds of data are processed while using Zoom. The extent of the data processed depends on the data provided by the participant while registration, participation or services requested for/during an online meeting. Following is the list of data being processed as of the time of publication of this policy:

User details: First name, last name, telephone, email address, password.

For recordings: All video and audio files and presentation recordings, text file of online chat.

When dialing in by phone: Information on incoming and outgoing phone number, country name, start and end time. If necessary, further connection data such as IP address of the device can be saved.

Text, audio and video chat: The participant may be able to use the chat, question or survey functions in an “online meeting”. In order to enable the display of video and the playback of audio, the data from microphones and cameras of the participant’s terminal devices will be recorded and processed for the duration of the meeting and shared with the participants whoever has asked for the recordings and also will be stored with us a recording for the time that we need to keep the class/meeting recordings.

We use Zoom now to conduct online meetings, classes and workshops. We will be using other similar and advanced platforms and apps in the future. We reserve the right with ourselves to record all our online meetings and to log the chat content for all interactions hosted by us, as this helps us in creating content for further meetings or advanced courses. The fact that we are recording will be displayed on the participants’ device in the app. In the case of webinars, we may also process the questions and requests asked/posed by the participants.

Sivananda Canada reserves the right to record all online meetings hosted/co-hosted by us and shall not pass on such rights to any participant or third party. However, we shall share only the audio recordings with participants, co-hosts or stakeholders upon requests. Sivananda Canada shall not be responsible for any participant recording the proceeds of the meeting/ workshops in any format with an external device or method as this in no way can be controlled by us.

For Sivananda Canada, the Canadian provincial Data Protection Act is the legal basis for data processing. In connection with the use of Zoom, we will stay interested in the effective implementation of online meetings. Any data of the participants collected during the online meetings, will feed into our regular database and the participant will be contacted for similar courses/workshops and with requests to subscribe to any of our

voluntary services including newsletters. And the participant has the right to unsubscribe any such services.

The personal data processed in connection with participation in “online meetings” is generally not passed on to third parties, unless it is specifically intended to and agreed upon by all parties to be done so. However, the content of the “online meetings” will be archived with us and may be passed on to third party vendors for creation of educational content specifically, or promotion of our classes/courses/workshops, if and as and when such needs arise. The service provider viz. Zoom necessarily obtains the above mentioned data or knowledge of the above mentioned data, in so far as this is provided for in the context of the data processing agreement with Zoom.

Signing up to our mailing list

Subscribing to our mailing list means you can automatically receive our free email alerts, which feature the latest news and information about Sivananda Canada including calls for participation in our various programs, courses, workshops, staffing etc. Sivananda Canada may also send occasionally send out a survey to understand the needs of its constituency.

What kind of personal information is considered more sensitive?

Certain countries have laws that recognize particular types of personal information as more sensitive and therefore requiring greater protection. Sivananda Canada does not collect such personal information about health, religion, ethnicity, sexual life, and political opinions. All our data collection is protected by ethics and moral codes that we practice and expects to be practiced on us.

For participants at our events, staffing and workshops, Sivananda Canada may collect passport details and/or credit card details for registration fees (kept only for three months time, for any transaction on the card later than this period, you will be prompted to share information yet again) and travel. This information is stored securely and only accessible by the relevant staff in Finance or Travel.

How we use your personal information

Sivananda Canada will use your personal information:

- to fulfil your requests to submit an application or register on the website
- to allow us to review, evaluate and administer scholarships, and other Sivananda Canada programs.
- to allow us to administer grants/ charitable donations in kind or cash under our outreach programs.
- to enable us to monitor progress and completion of these programs
- to enable us to monitor and manage conflicts of interest
- to contact you if you are involved in a program, we are managing

- to contact you to make recommendations, proposals, or share opportunities you may potentially be interested in
- to make administrative and marketing communications
- to enable you to use our online services (e.g., our forums, message boards, social media sites, blogs)
- to administer any financial transaction between us
- to register you for an event and any administration associated with the event
- to inform you of events or publications we think you may potentially be interested in for converging purposes so that we can make this work more meaningful and far reaching.
- to satisfy legal obligations and reporting requirements which are binding on us by way of we are receiving government/ corporate or individual / third party grant towards such a program.
- for the prevention of fraud or misuse of service
- for the establishment of, defense against, or enforcement of legal claims.

Lawful grounds

Under certain laws, we are required to rely on one or more lawful grounds to collect and use the personal information that we have outlined above. We consider the grounds listed below to be relevant:

1. **Legal obligation.** Where the processing of your personal information is necessary for us to comply with a legal obligation to which we are subject (e.g. because we have to provide information to tax authorities or any other statutory compliances in the country or a foreign country).
2. **Contractual relationship.** Where it is necessary for us to use your personal information in order to perform a contract to which you are a party where we might collect and store your personal information, address, banking coordinates, taxation details. (or to take steps at your request prior to entering a contract).
3. **Legitimate interests.** We rely on this basis where applicable law allows us to collect and use personal information for our legitimate interests and the use of your personal information is fair, balanced, and does not unduly impact your rights. For instance, it is in our legitimate interest to use personal information in association with planning of, delivery of, and monitoring of our programmatic work and grant making to individuals, non-profits.

It is also in our legitimate interest to use personal information in association with planning of, receipt of and monitoring of our programmatic work and grant receiving from individuals, non-profits, government agencies or corporates.

4. **Consent.** We may obtain your consent to use your personal information in certain circumstances (e.g., to send you email marketing). We will ensure that when we obtain your consent, you are free both to give it and to decline to give it. Additionally, you may always withdraw your consent at any time without any further detriment to you.

Use of our online services (e.g., forums, social media, blogs)

We may make available certain interactive services through our website such as message boards, blogs, social media and wikis (**Forums and networks**). You will be able to post information and materials to Forums.

Any information (including personal information) that you post in a Forum becomes public information and may be available to other visitors to our website and to the general public. In addition, your name may be available in association with any posting you make. Additionally, information regarding your Forum activities is also available for other users to view.

Please exercise caution and discretion when posting information (including personal information) in a Forum. In particular, please do not post personal information about other individuals unless you are confident that they would not object to their personal information being used in this way. If you post any personal information relating to other people, you represent that you have the authority to do so and to permit us to use the information in accordance with this privacy policy. **SIVANANDA CANADA IS NOT RESPONSIBLE FOR THE USE BY OTHERS OF THE PERSONAL INFORMATION THAT YOU DISCLOSE IN FORUMS.**

Do we share your personal information?

Personal information collected by Sivananda Canada (through the website or otherwise) will not be shared with third parties for marketing purposes or surveys. However, we may ask third-party processors to assist us or we may disclose your personal information to selected third-party processors (such as MailChimp, Retreat Guru etc which is a third-party marketing automation / administration platform to assist with managing email addresses / occupancy and sending emails to our subscribers). When you sign up to receive email updates from us and provide us with your email address, you will receive an automated email originating from these third parties confirming your subscription and providing you with a link to unsubscribe from the list.

We may also engage third parties including companies and individuals/ free lancers to assist us with website hosting, data analysis, transaction processing, grant making, event management, communication, branding, and other administrative services.

Securing your personal information

Sivananda Canada takes reasonable technical and organizational precautions to prevent the loss, misuse, or alteration of your personal information. Information we collect from our applicants/ students is stored securely by us on our servers in Canada/ USA/, where Sivananda Canada is headquartered and pans. We restrict access to those who have a need to know and we train staff in handling the information securely. Data provided by subscribers to our mailing list or conference participants for registration purposes is stored by Mailchimp , Retreat Guru etc. and e-touches on their servers.

Unfortunately, there is no such thing as perfect security in the online environment. As a result, we cannot and do not guarantee the security of any information you transmit to us through or in connection with the website.

If you believe that your interaction with us is no longer secure (e.g., you consider that the security of any account you might have with us has been compromised) please immediately notify us by contacting us at hq@sivananda.org

How long do we keep your personal information?

We will keep your personal information for as long as necessary:

- to comply with any statutory or regulatory requirements we are subject to under applicable laws of the countries in which we operate.
- to fulfil the purposes for which the personal information was collected, or
- to defend our or a third party's legal rights.

If you have any questions, about the retention periods for holding your personal information, please contact us.

Your rights and preferences

Please note that we will honor your requests to exercise your rights to the extent possible and required under applicable law.

You have the right to:

- ask us for **confirmation** of what personal information we hold about you, and to request a copy of that information; if we are satisfied that you have a legal entitlement to see this personal information, and we are able to confirm your identity, we will provide you with this personal information;
- **withdraw your consent** at any time if we have relied on consent as the lawful ground to use your personal information;
- request that we **delete** the personal information we hold about you, as far as we are legally required to do so, and we are not legally required to hold it. (eg. It forms a part of our revenue and taxation compilation)
- ask that we **correct** any personal information that we hold about you which you believe to be inaccurate;
- **object** to the processing of your personal information where we (i) process on the basis of the legitimate interests' ground; (ii) use the personal information for direct marketing; or (iii) use the personal information for statistical purposes;
- ask for the **provision** of your personal information in a machine-readable format to either yourself or a third party, provided that the personal information in question has been provided to us by you, and is being processed by us (i) in reliance on your consent; or (ii) because it is necessary for the performance of a contract to which you are party; and in either instance, we are processing it using automated means; and

- ask for processing of your personal information to be **restricted** if there is disagreement about its accuracy or legitimate use.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing-related emails, text messages, or paper communications from us, we may still send you important administrative messages, from which you cannot opt-out.

Other websites

The website may contain links to third-party websites. These linked websites are not under Sivananda Canada's control and we are not responsible for the privacy practices or the contents of any such linked website, or any link contained in any linked website. We provide such links only as a convenience, and the inclusion of a link on the website does not imply endorsement of the linked website by Sivananda Canada. If you provide any personal information through any such third-party website, your interaction will occur on such third-party's website (not on our website) and the personal information you provide will be collected by, and controlled by, the privacy policy of that third party. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties. **PLEASE NOTE THAT THIS PRIVACY POLICY DOES NOT ADDRESS THE PRIVACY OR INFORMATION PRACTICES OF ANY THIRD PARTIES.**

Updating this privacy policy

Sivananda Canada may update this privacy policy by posting a new version on our website. If we update this privacy policy in a way that significantly changes how we use your personal information, we will bring these changes to your attention. Otherwise, we would recommend that you periodically review this privacy policy to be aware of any other revisions.

How to contact us

If you have any questions about this privacy notice or our treatment of your personal information, please contact us via **email:** toronto@sivananda.org. We prefer only emails for this function and no phone calls or snail mails may be used/deployed for this purpose.

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