Introduction

At Gaia Education we take the use of your data seriously. We aim to be clear and transparent about how we collect, what we collect and how we use your data. We also want to give you control of your data and a choice of how this data is used.

This privacy policy gives you information about:

- 1. Where we collect information about you
- 2. What information we collect about you
- 3. How we use your data
- 4. Marketing and consent
- 5. Whether we share your data
- 6. Your data protection rights
- 7. Data security
- 8. For how long we store your data
- 9. What to do if you want to raise a concern or complaint

1. Where we collect information about you

Gaia Education may collect information from you in the following circumstances:

a. When you give it to us DIRECTLY

You may give us your information when you:

- Sign up to one of our courses
- Sign up to one of our events
- Make a donation
- Purchase one of our products
- Make an application or become a certified trainer
- Submit an application to conduct a certified EDE programme
- Apply for a vacancy
- Contact us with a query
- Subscribe to one of our webinars or masterclasses
- Fill in a Gaia Education survey

b. When you give it to us INDIRECTLY

Your information may be shared with us by independent course organisers, for example when you take part in a Certified EDE or a ToT, where the courses are not run directly by Gaia Education.

When courses are run in partnership with other organisations we are the joint data controller of the information. We will always ask those working on our behalf and our partners to ask for your consent to receive Gaia Education news and marketing emails.

c. When you use Gaia Education's SOCIAL MEDIA

When using our social media services such as Facebook, LinkedIn, Twitter, Instagram, Pinterest and Google+ the settings you have in place may give us permission to access information about you from these accounts. These cookies enable in-depth campaign reporting and the tracking of social network



users when they visit our websites by using a tagging mechanism provided by those social networks. If you want to change what information is shared with us you can refer to the following privacy notices to see how you can change your privacy settings:

https://www.facebook.com/policy.php

https://twitter.com/en/privacy

https://www.linkedin.com/legal/privacy-policy https://help.instagram.com/155833707900388 https://policy.pinterest.com/en-gb/privacy-policy https://policies.google.com/privacy?hl=en-GB&gl=uk

d. When the information is publicly available

We might obtain personal data about individuals from places such as Companies House or information published in the media.

e. When we collect information via our WEBSITE

Cookies

Cookies are small data files that are served by our platform and stored on your device. The Gaia Education website is hosted by Simplero and it makes use of cookies for technical reasons and to enable a personalised experience for visitors and registered users.

Gaia Education also uses the Facebook pixel provided by Meta Platform, Inc. ("facebook") in its website. The pixel is a code that track the actions of users on Gaia Education's website that allows the organisation to measure understand the pages visited, the time in each page, and in general terms, what type of engagement the user had with our website. The purpose of this data processing is to be able to deliver personalised ads and measure the ad performance. The identifiers provided are the same as mentioned below in this policy.

Newsletter subscription

This site offers newsletter or email subscription services, and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/ unsubscribed users. We use external programmes to send and manage marketing emails and newsletters.

Google Services

In our website we use several google services, like, Google Analytics and Google Tags, your information is stored and collected as cookies. These cookies are used to collect analytical information about how visitors use the website. All web traffic and usage information is collected in an aggregate form.

For more information about Google Analytics cookies, see the <u>official Google Analytics page</u>, or <u>how google uses information</u> from sites or apps that uses their services.

Online shop website and debit/credit card security

The Gaia Education website offers e-commerce or payment facilities and some cookies are essential to ensure that your order is remembered between pages so that we can process it properly.



The Gaia Education website uses third party platforms to process e-commerce transactions. This site uses the industry standard protocol which encrypts your information as it is transmitted over the internet.

If you visit our website, Gaia Education may collect certain information from your browser, such as the IP address (an IP address is a number that can uniquely identify a computer or other internet device). We can tell what website directed you to our website by looking at information from our browser.

The Gaia Education website contains links to external sites not owned or managed by us. We cannot be held responsible for the content or for the privacy of any external sites.

2. What information do we collect about you?

Personal data

The following list is the personal data we may collect about you:

- First name and surname
- Email address
- Postal address
- Date of birth
- Country of residence
- Bank details
- IP addresses

Sensitive personal data

We only collect sensitive personal data where there is a clear reason for doing so and this is limited. Examples of when we may collect this data is if we need to provide services to you and we need to make adjustments based on your physical health needs, or if we need to support you to be able to take part in our course.

3. What lawful basis do we use to process data?

There are six lawful bases for processing an individual's data, however, only three apply to our activities:

Contract

Information is processed to fulfil a contractual relationship.

Legitimate interests

Information is processed because it is within Gaia Education's legitimate interest to do so. Where we have used legitimate interests, we will always balance this with your rights and ensure that it has a minimal privacy impact.

Consent

Information is only processed based on your explicit consent.



4. How do we use your data?

For marketing and fundraising

Please see section 5

When you sign up to one of our face-to-face courses

Including:

- To process your payment
- To be able to contact you with details of the course
- To ensure that our courses can be tailored to individual learning needs
- So that we can cater to any mental/physical health needs and dietary requirements
- So that we can book and organise accommodation
- To ensure that we are adhering to the health and safety regulations of the course venue

When you sign up to one of our e-learning courses

Including:

- To process your payment
- So that we can register you on the online platform
- To generate individual login details for online courses
- To be able to provide you with your login details for online courses

To fulfil contractual obligations

Including:

- When you have bought a product or course from us we will need to process your payment in order to provide you with the product
- To confirm receipt of payment
- To process your details in order to send you the product this is very similar to the first point
- In case we need to contact you about a transaction you have made

Profiling

We use profiling to segment our information so that we can effectively analyse it. This allows us to develop our marketing strategy to specifically target what information we send out and ensures that the information we send to you is relevant. It ensures that you only receive information that is appropriate, based on your engagement with us, and that we think you will find interesting. We will only send you information when you have given us your express consent to do so.

We may build your profile based on geographic or demographic information as well as how you have engaged with us before, what courses you have taken, and what products you have purchased from us.

Administration and Governance

- Maintaining 'do not contact' lists
- Asking you to take part in surveys about the course you have been on or the product you have bought, to help Gaia Education improve their work and products
- For reporting purposes



- Monitoring staff, board members, volunteers and employees for recruitment or compliance purposes
- Administration of payroll and staff benefits such as pensions
- If you contact us and we need the information you have provided in order to correspond with you
- Processing applications for certification

Sharing your story

With the consent of the individual we may use quotations from feedback we receive on our website. We also publish reports on our website from some of our courses.

5. Marketing & Consent

From 25 May 2018 we only contact you for marketing purposes or to share our news with you where we have your express consent to do so. We will not send you marketing emails if you have asked us not to

We make it easy for you to let us know if you want us to communicate to you or not. Our forms have a clear opt in to marketing and news tick box - if you do not tick it, we will not send you marketing emails.

When you do give consent you can opt out at any time by clicking 'Unsubscribe' at the bottom of our emails, or by emailing info@gaiaeducation.org

The maximum marketing that we carry out includes quarterly newsletters as well as weekly emails regarding upcoming courses. We only send information we think you will be interested in.

6. Do we share your information with anyone else?

We will never sell your information to anyone else for the purposes of marketing and we only share it with necessary people.

Where we run a course or promotion in partnership with another organisation your details may need to be shared to fulfil our contract with you or for legitimate reasons. An example of this would be an organisation which is running a Training of Trainers - we need to send them your information in order to book you into appropriate accommodation and to deliver services tailored to your needs.

We may share information with third parties who are performing a service for us. An example of this is Zoho, a CRM management system and secure database where we store our information.

In addition, the information collected with the Facebook pixel mentioned above is shared with Facebook and may be combined with other information that you have provided to Facebook or that Facebook has collected from your use of their services. Facebook processes the data in accordance with Facebook's Data Policy, which can be found at https://www.facebook.com/policy.php.



7. Your data protection rights under GDPR

1. The right to be informed

Under GDPR, we will be as transparent as possible on how we use your data. This information will be given in our Privacy Policy where we will be as clear and concise as possible.

2. The right of access

You can write to us to ask us, free of payment, what information we hold about you at info@gaiaeducation.org. We will respond to you within 30 days after you have confirmed your identity.

3. The right to rectification

You have the right to ask us, free of payment, to change your details if they are not correct or up to date.

4. The right to erasure

You can ask us, free of payment, to delete your data and in most cases we will be able to do this. There may be some circumstances in which we have to keep your data.

5. The right to restrict processing

You can ask for us to stop processing your data for certain activities or for us to suppress your information.

6. The right to data portability

Individuals have the right to request their information and transport it to another service. This is unlikely to be relevant to Gaia Education.

7. The right to object

In terms of marketing, you have the right to object and for these activities to be stopped.

8. Rights in relation to automated decision making and profiling.

This allows an individual access to information about the reasoning behind any decisions taken by automated means.

8. Data Security - how do we keep your data safe?

We ensure that we have the relevant controls in place to make sure that your data is safe. Most of our data is stored electronically and we ensure that our network is password protected. We make every reasonable effort to ensure that the data you send to us is safe.

Your data is only accessible by trained staff, contractors and interns.

9. How long do we store your information?

We will only keep your information for as long as we require it for the purposes set out in this document or for operational purpose or until you stop giving us your express consent.

10. How do you contact us if you have a concern or want to complain?

If you have any concerns, we would be happy to address them and work towards resolving them.

You can contact us by:

Phone: +44 0131 618 9770 Email: <u>info@gaiaeducation.org</u> In writing: 567 West Whins,

The Park, Findhorn,



IV363SH Moray,

Scotland

N.B. If you are contacting us via phone or in writing, please provide a way for us to reply to you.