

GDPR Compliance Statement from Debra Schwartz aka Cinnamon Moon for Spirit Lodge

May 2018

This has been written after much research online.

Mainly this is a response to the information supplied by the Information Commissioners Office for micro businesses. A document is on their website called '12 steps to take now'.

All this can be found at ico.org.uk

1. Awareness.

I am the main trader, with my daughter who works from her own office. I have no staff or assistance of any kind. I have informed myself of what is required for my organization. I am fully aware that the law is changing in May 2018. I work with one Personal Computer. It is password protected. No other person has access to or uses my office. I shred all paper records promptly and regularly.

2. Information I hold.

The email addresses of people who have emailed me and to whom I have replied. These are automatically saved on my personal comcast.net account or my 50 megs Spirit Lodge account email

Email and postal addresses for people who have ordered from my website, e.g. Seminars, Readings, and private coaching or physical items such as Certification which have been shipped to them. or by emailing or calling me are saved for 5 years and then deleted. These are normally ordered via my own web space that is hosted by 50MEGS that is a United Online Company. United Online Web Services, Inc., c/o United Online, Inc., 2 Executive Drive, Suite 680, Fort Lee, New Jersey 07024. (Copyright © 2018 United Online Web Services, Inc. All rights reserved.) Or sometimes from my Face Book or MeWe pages.

My website is reached on <http://www.spiritlodge.itgo.com> (a part of 50megs, see details above) or by using my domain URL which is: www.Spiritlodge.online both are password protected.

I am located in the USA.

I never share this information with anyone at all. I have never shared information with anyone.

3. Communicating Privacy Information.

This document will be located on my website as a pdf link.

Privacy information with regards to United Online, Inc who host my website can be found on this page http://www.50megs.com/fs_img/search/privacy-statement.htm

4. Individuals Rights

On request I will delete data immediately. If someone asks to see a copy of their data I can take a screen shot of this and send to them by post or email. I only keep their information for 5 years after my dealings with the customer has been finished. This is in case an addition or changes need to be given.

5. Subject Access requests.

If anyone requests these details I can normally respond immediately or anyway within 48 hours.

6. Lawful basis for processing data

If a person has emailed me I shall never add their email or physical address to any database or spread sheet.

I do not add emails to any list.

7. Consent

I have never harvested or purchased email lists. Anyone on my list has actively placed themselves there.

8. Children.

My operation does not involve nor is suitable for children. I have never sold to a child so I do not anticipate this to be a problem.

9. Data Breaches.

I have my website and my PC password protected. If I was informed of a data breach in a system I am using I shall closely follow and seek advice as to how it should be handled.

10. Data Protection by Design and data Protection Impact Assessments

I have familiarized myself with the ICO's code of practice on Privacy Impact.

11. Data Protection Officer

Although I don't believe I need one, I have appointed myself as DPO.

12. International.

My web designer is in the UK so I believe my lead data protection supervisory authority is also in the UK. ICO.