Data Protection and Privacy Policy in accordance with Article 13 GDPR

1. General

To make it easier for you to complete this training and to achieve the best possible results, we offer you the opportunity to use additional services (smartphone app, Kalapa Academy Hub e-learning platform, surveys, on-site assessments) in addition to the actual training.

Using any of these additional offers is offered on an entirely voluntary basis. You may take this training without having to use these any of these additional services.

If you wish to use any or all of our additional services, it is necessary that you give your consent to use them in accordance with this Privacy Policy and provide us with different personal data points.

We take the protection of your personal data very seriously. Your data for the surveys will be collected in a pseudonymised form by the participants entering a "personal code" and "processed" by us in accordance with the applicable data protection laws and regulations, in particular, in accordance with the EU General Data Protection Regulation (hereinafter referred to as GDPR).

We take the protection of your personal data very seriously. Your data will be collected for using our smartphone app, filling out surveys and participating in computer-based tests by specifying a "personal code", pseudonymized by yourself. You are free to choose which ever username and e-mail address you like for using our online platform "Kalapa Academy Hub".

Your data will be "processed" by us in accordance with the applicable statutory data protection provisions, in particular the European Data Protection General Regulation (GDPR).

Below we inform you about the processing of your personal data in accordance with Article 13 GDPR.

2. Definition of terms

For the purposes of this privacy statement, we use the terms as defined in Article 4 GDPR:

"Personal data" means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Processing" means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission or transfer, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

"Consent" of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

"Processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

"Third party" means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.
3. The data controller is:

You can contact the data controller using the following contact details:

Kalapa Academy GmbH, Genter Straße 8, 50672 Cologne, Tel.: +49 (0)221 / 986 55 248
Email: support@kalapaacademy.com.

4. Purpose of data processing

We process your data via the additional services offered by us in order to facilitate the execution of this training and to ensure the best possible outcomes and learnings for you.

If you give your consent by the end of the Final Survey of this training, your "personal code" will be converted into a randomly generated code for the purpose specified above (usually four months after the end of the training has ended) and we will then process the data for future scientific research. The use of a "personal code" prevents the data from being traced back to you.

Your data will not be processed for any other purpose unless you specifically consent to the processing of your data for other purposes in advance.

Below we describe all possible additional services of our training offers in order to explain to you the individual modules and the related purposes of data processing in a transparent way:

a) Kalapa Academy Hub (online platform):

Our online platform provides:

- Important information to get started, including links to initial and final surveys
- Documentation of the training modules (flipchart protocol, handouts, slides)
- Videos (Youtube, TED, Kalapa Academy)
- Recommendations for further reading (books, links to articles)

The platform does not record or track your progress.

b) App:

Our app provides a number of features: Meditation timer, guided meditations, breathing exercise, optional reminders in everyday life ("mindfulness bell"), creating a peer group together with other training members, statistics of completed meditation exercises.

Our app captures two data points:

1. number of completed exercises (counter),
2. number of total minutes practised.

If booked by your employer, these two data points will be part of your Personal Report.

c) Surveys:

Our surveys are used for the pseudonymized collection of demographic data as well as the collection of personal information about training participants before the actual beginning of this training and after the training has ended.

The client (usually your employer) receives a group report based on the pseudonymized, aggregated data of all training participants within your group. This cannot be linked to individual participants.

If this service has been booked by the client, your pseudonymised data will also be used for your personal evaluation as part of a "personal report" for the individual training participants and made available exclusively to the corresponding participant via his "personal code", so that you can better assess your personal effects of this training.
d) On-site tests:

We may conduct a number of different on-site tests, e.g. computer-based tests conducted on-site under the guidance of one of our trainers. If your training programme includes any of such test, we will provide all necessary materials and equipment, e.g. laptops for the "ANT-Test".

These on-site tests serve the same purpose as our surveys (see previous paragraph above).

5. Use of "processors" and disclosure of your data to "third parties"

Your personal data will be stored properly in data centers operated by German-based contract processors, whom we carefully selected, in an access-restricted and encrypted working environment and processed for the purposes described above only. The results of on-site computer-based tests are stored locally and transferred to a server of a data center in Germany for processing by an employee with special training using a portable USB storage device for the transfer.

A transfer of the data to "third parties" does not take place, unless we are legally obliged to do so or you explicitly consent to the transfer of the data to "third parties" separately.

6. Legal basis for processing

We process your collected data exclusively on the legal basis of your consent in accordance with Article 6 paragraph a) GDPR.

All your information is always provided on a completely voluntary basis. The consent to the use of our additional offers and services as well as the consent to the permanent storage of the completely anonymous data do not depend on your the actual participation in the training.

7. Storage and erasure periods

If the data is no longer required for the purpose for which it was originally processed, the personal data we process will be routinely erased 4 months after the end of this training, unless you have consented to the long-term anonymised storage of your personal data. If you withdraw your consent, we will erase your data immediately, unless your data has been completely anonymised with your consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

8. Your rights as data subject

You are entitled to exercise the rights described below at any time:

- Right to confirmation and information about personal data we process in accordance with Article 15 GDPR
- Right to rectification of personal data in accordance with Article 16 GDPR
- Right to erasure of your personal data ("right to be forgotten") in accordance with Article 17 GDPR
- Right to restriction of processing in accordance with Article 18 GDPR
- Right to portability of personal data in accordance with Article 20 GDPR

Please use the contact details provided in Section 2 of this privacy statement. However, due to the procedure used to pseudonymise your data it will be necessary to disclose your "personal code" to process your data subject rights, otherwise we will not be able to identify you.

9. Right to withdraw your consent

You can withdraw your consent at any time with effect for the future. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. You can send us the withdrawal notice by post, email or by fax. You will not incur any costs other than the postage or transmission costs according to existing standard rates.
10. Lodging a complaint with the supervisory authorities in the event of data protection infringements

If you believe that your privacy rights have been infringed, you can contact the supervisory authority in your federal state or the state in which our company has its registered office. If a complaint concerns a company domiciled in another federal state, the supervisory authority will forward the complaint to the competent supervisory authority there.

11. Notification obligation regarding rectification or erasure of personal data or restriction of processing

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17 (1) or Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

12. Statutory or contractual provisions for the provision of personal data; requirement for the conclusion of the contract; obligation of the data subject to provide personal data; consequences of failure to provide personal data:

As described above, we collect and process your personal data exclusively on the legal basis of your consent in accordance with Article 6 (a) GDPR. The provision of your data for the purposes described here is, therefore, neither contractually nor legally required.

If you do not wish to participate in the surveys and do not provide us with any personal data, the only consequence will be that we will not be able to provide you with a “personal report”.

13. Automated individual decision-making, including profiling

We do not use automated decision-making - including profiling as laid down in Article 22 (1) and (4) GDPR.

14. Data security

We use technical and organisational measures to protect your data against accidental or intentional manipulation, loss, destruction or unauthorised third-party access. Our security measures are revised on a continual basis and brought into line with the latest technology standards.

15. Questions / comments

If you have any questions or comments regarding data processing or data protection in general, please use the contact details, specified in Section 3 of this privacy statement.