

SHINNYO-EN PRIVACY POLICY FOR WEBSITE

Thank you for visiting one of our websites of the Shinnyo-en organizations in Europe (“we”, “us”, or “our” and jointly with the local Shinnyo-en organization in other countries “Shinnyo-en”) and/or contacting us by email or otherwise. We are committed to protecting your personal information and your right to privacy.

In this privacy policy we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it.

We aim to ensure that all information you give to us is held securely and is only used in a manner that you have consented to or would expect. Everything we do is underpinned by our values; we strive to be reliable and live responsibly to high professional standards.

This privacy policy applies to Shinnyo-en UK, address registered to The Manor House, Woodstock, Lane North, Long Ditton, Surrey KT6 5HL, United Kingdom - as data controller with regards to the personal data we obtain when you apply to become a member or request for services that we provide or otherwise interact with us online, face to face, by post, over the phone or via SMS. A data controller is the person or organisation who determines the purpose for which, and the way, any personal data is processed. The data controller is responsible for establishing practices and policies in line with the Regulations.

This privacy policy explains how we collect, store and use your personal data.

The information in this policy is provided in accordance with the General Data Protection Regulations (GDPR) and the relevant applicable local data protection laws of the respective EU member states.

What information do we collect?

When you access the Shinnyo-en websites, we will collect some technical data including internet protocol (IP) address, your login data (if and to the extent a login is required), browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the relevant Shinnyo-en website.

Our websites use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our sites. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

For more information about our cookie, please see our cookie policy:

https://docs.wixstatic.com/ugd/6c2537_0e78940d4ed24d1e94d47062ad98cddc.pdf

We also collect data from you when you send us an email or otherwise contact us e.g. by letter, facsimile or SMS or through a contact form on our website. Some of this information is personal data which can be used to identify you.

Examples of personal data we collect when you send us an email, online inquiry form or letter or otherwise contact us or log-in to our online portal for members will include your name, email address, log-in ID and password.

We collect religious information, which is a Special Category of Personal Data, about you during your membership and request for our spiritual guidance. In those situations, you may disclose your race or ethnicity, medical details, religious or philosophical beliefs when you request for our spiritual guidance.

We will only collect data which is relevant to the purpose for which you have given it.

How we use your personal data

Your name, contact details and other personal data may be stored electronically and accessible only by authorised users within our organization. The purpose of collecting personal data is to answer your questions and ensure you receive the materials, resources and service you may have requested. We may also use your personal data to keep you informed about our work if you have requested this or have not opted out of receiving such communications. Examples of such communications are our publications, newsletters and other paper based and electronic communications.

In addition to the above, if you are a member, we collect your personal data for the following purposes:

- Registration of new members
- Maintenance and management of membership
- Registration of online member portal
- Administration of Student ID for members enrolled in Japan-based Chiryu Gakuin dharma school and international Chiryu Gakuin Dharma Program.
- Managing reservations for members who attend religious rites, services and training
- Evaluation and validation of members' spiritual practice and subsequent roles and appointments within the spiritual community
- To perform religious rites
- To provide spiritual guidance and other religious services and training
- Management and operation of Shinnyo-en.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

On what legal basis we process your personal data

- Explicit consent of you as the data subject so that we can keep you informed about news, events, activities and services.
- Legitimate interests so that both religious and non-religious services, practices and rituals of Shinnyo-en may be planned, run safely and legally, and with appropriate levels of resources and equipment, and monitored for operational and management purposes.
- Processing is carried out by us as a not-for-profit body with a religious aim provided the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes)

How will we contact you?

We may contact you via post, email, telephone or SMS text.

If you are a new person interested in joining Shinnyo-en or in our religious services, we will aim to capture your consent for information and our purposes of the processing for which the personal data is intended at the data collection point. You do not have to give such consent – it is your decision. Should you wish you can specify a time limit for your consent to remain valid for, after which time we will not be able to contact you unless you give further consent. As a default position we will consider consent to remain valid while you are receiving our regular communications and have not objected to doing so.

You can give or withdraw consent to information and our purposes of the processing for which the personal data is intended at any time by writing to us at the address above, emailing dpo.gdpr@shinnyo.org or you can call us on +44 20 8398 2221. Please let us know if you change your contact details or if you believe any information we hold is incorrect.

Storing and sharing your data

We store your data on a secure paper-based or local-based database in each entity's premise or

database hosted by at our own servers based in Europe, Singapore and Japan. We will share your personal data within the Shinnyo-en Group (except for a list of Shinnyo-en Related Foundations) listed in the URL link below.

<https://www.shinnyoen.org/connect/>

If, for operational purposes, we are required to move your data outside of the EEA, we will ensure that adequate levels of data protection are in place. With respect to the transfer of data to Singapore, Japan and other countries, we have entered into respective EU Standard contractual clauses ("SCCs"). You may request [our DPO] to provide a copy of the documents used to protect your information.

Your data will not be processed outside of us and will not be disclosed to any parties outside of us, except within the Shinnyo-en organization to administer your membership and – if and to the extent necessary - to trusted partners and affiliates with whom we work, or work for us,

to complete certain tasks, e.g. sending our information material, sending electronic mail, or to process membership fees and payments for services.

With respect to the storing and other processing of your personal data, we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. As part of our responsibilities to ensure that data we hold is accurate and up to date, we may occasionally undertake a process of data cleansing and we will employ a specialist third party to carry out that process.

We only enter into relationships with third parties who have appropriate data protection policies and procedures in place. All data held by third parties is destroyed when it is no longer needed.

We will not disclose your data to any other third parties unless we have your explicit consent to do so. At no time, will your data be passed to a third party for marketing purposes.

How long do we hold your personal data?

Your personal data will be held on our database until your personal data is not required for or by our services and activities or relevant laws and regulations. There may be statutory reasons beyond our control for storing data. We will not keep your personal data for any longer than is necessary. Once it is no longer required we will take all reasonable steps to destroy it or erase it from our systems.

Your Rights

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which Shinnyo-en holds about you;
- The right to request that the Shinnyo-en corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for Shinnyo-en to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) .
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable)
- The right to lodge a complaint with the supervisory authority in your country of with the lead supervisory authority for us.

Usually, you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests without undue delay, usually within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

What else you should know about privacy

If you access any of Shinnyo-en's internet site, please remember to close your browser when you have finished your session. This will help ensure others cannot access your personal information and correspondence if you share a computer with someone else or are using a computer in a public place like a library or internet café. You, as an individual, are responsible for the security of, and access to, your own computer.

Please be aware that whenever you voluntarily disclose personal information over the internet that this information can be collected and used by others. In short, if you post personal information in publicly accessible online forums, you may receive unsolicited messages from other parties in return. Ultimately, you are solely responsible for maintaining the secrecy of your usernames and passwords and any account information. Please be careful and responsible whenever you are using the internet.

Shinnyo-en pages may contain links to other websites, and you should be aware that we are not responsible for the privacy practices on other websites.

Your Questions

For any questions you may have regarding this Privacy Policy and our processing of your personal data, please do not hesitate to contact us by email: privacy.uk@shinnyo.org. You may also contact our data protection officer (DPO) by email: dpo.gdpr@shinnyo.org.

If at any time you have any concerns about the way your data has been processed by us and those concerns cannot be resolved by us directly you have the right to take those concerns externally and raise them with the relevant data protection authority.