

«Vipassana Association Switzerland»

Data Protection Policy

This document concerns the collection, storage and viewing of the information given by students in connection with a Vipassana Meditation course. The data could be contained in any of the following documents:

1. Students/Dhamma Servers Application Form
2. Students/Dhamma Servers Registration Form
3. Medical Questionnaires
4. Practices in Conflict Questionnaires

This information will be referred to in this document as the data.

The owner of the data is Vipassana Association Switzerland of Bern. The owner is referred to in this document as **The Trust**.

This document also concerns notes that in rare cases are processed and shared among Assistant Teachers in relation to courses. Such data will be referred to as the notes.

Definitions of other Terms that are used in this Document

Assistant Teacher: Anyone who has been appointed by S.N. Goenka, or his representative, to conduct Vipassana Meditation courses.

Student: Anyone who applies to come to a Vipassana Meditation course, led by S.N. Goenka, one of his Teachers or his Assistant Teachers.

Old Student: Anyone who has completed a Vipassana Meditation course under S.N. Goenka, one of his Teachers or one of his Assistant Teachers.

Registrar: An old student asked by an Assistant Teacher or the Trust to process application forms, Medical Questionnaires and/or Practices in Conflict Questionnaires for a Vipassana Meditation course.

Course Manager (male or female manager): an old student who has been asked by an Assistant Teacher to manage (a part of) a Vipassana course.

Centre Office Manager: an old student who has been asked by the Trust or an Assistant Teacher to perform administrative tasks for the Trust.

Dhamma Server: an old student who offers to help on a course or at a centre without remuneration.

Translator is an old student who is asked by an Assistant Teacher or Registrar to translate information on forms for use by the Assistant Teacher or Registrar.

Purpose of Collecting the Data

1. To enable the Assistant Teacher to assess if a student is suitable to be accepted for a course and to enable the registrar to plan accommodation, food and sometimes transport for the student.
2. To enable proper guidance and assistance to be given to students prior to, during and after a Vipassana course
3. To provide a record of students who have attended courses offered by the Trust.

Collection of Data

4. The Registrar collects Application Forms and sometimes, Medical Questionnaires or/and Practices in Conflict Questionnaires before a student/Dhamma Server is admitted to a course. Students give information voluntarily.
5. The Course Manager or Centre Office Manager collects Registration Forms from students/Dhamma Servers on arrival at the course site. The Registrar and Course Manager hand over all Application and Registration Forms, including Medical Questionnaires and Practices In Conflict Questionnaires to the Assistant Teacher(s) conducting the course.

Viewing of Data

1. The Application Forms may be read by the Registrar(s), the Assistant Teacher(s) conducting the course or another Assistant Teacher who can give approval for acceptance to a course. A translator may translate the data on this form where necessary.
2. The Medical Questionnaires may be read by the Registrar, the Assistant Teacher(s) conducting the course or another Assistant Teacher who can give approval for acceptance to a course. A translator may translate the data on this form where necessary.
3. The Practices in Conflict Questionnaire may be read by the Registrar, the Assistant Teacher(s) conducting the course or another Assistant Teacher who can give approval for acceptance to a course. A translator may translate the data on this form where necessary.
4. The outside of a Registration form (i.e. pages 1 and 4) can be read by any old student approved to do by an Assistant Teacher. This will mostly be the Course Manager, the Centre Office Manager and the Assistant Teacher(s).
5. The inside of a registration form (i.e. pages 2 and 3) may be read only by an Assistant Teacher. A Registration Form may be translated by a translator if necessary.

Reasons for storage

The Data are stored for the following reasons:

1. To provide a record of the course.
2. To enable help to be given to students in the future (when coming for another course).
3. For legal reasons.

Storage of Data

...< *Insert your own description here based on what follows:*...Forms are stored in the centre office in a locked filing cabinet until one or 2 days before the course. During the course the forms are kept in the Assistant Teacher residence with the key only available to the Assistant Teacher(s). At the end of the course forms are stored in the Assistant Teacher's residence in a locked cabinet....>... Only Assistant Teachers, or at times the Centre Office Manager, acting under instructions from an Assistant Teacher, can access them. They are stored in folders by the date of the course.

A summary of the data provide by a student may be made on a computer for easy perusal by the Assistant Teacher or the registrar during the course. This summary data, except the student's name, date of birth, gender, address, email address, telephone number and partner's name must be deleted from the computer after the course has ended. The following information may also be retained in the computer record: course dates and types of courses that student has attended.

Destruction of Data

The forms held by the trust will be destroyed after a period of 10 years.

Summary data made on a computer for use before and during a course must be removed from the computer after the completion of the course unless permitted above in the paragraph "Storage of Data".

Data transfer abroad

We herewith advise that applications for courses and related correspondence at the moment are saved and processed on a server in the United States of America. If you are not agreeable with that please do not use electronic applications and note expressly on the paper application form that you do not wish your data to be processed electronically.

Instructions given to Registrars regarding the Data

The following text is used to ensure that registrars know how to deal with the data.

"These forms may contain sensitive data regarding students and Dhamma Servers. The data may not be copied without the permission of an Assistant Teacher. The data may not be given to anyone other than an Assistant Teacher, a Course Manager or a Centre Office Manager. To assist with management of the course, some of the data from these forms may be entered into a computer. You may not read pages 2 and 3 of the registration forms. The data may never be used for commercial purposes by the Trust, the centre or anyone else

Data that students supply may be summarised on a computer, however all data must be removed at the end of a course except student's name, date of birth, gender, address, email address, telephone number, partner's name, course dates and types of courses that student has attended.

The registrar must also ensure that all emails and electronic files pertaining to students (apart from student's name, date of birth, gender, address, email address, telephone number and partner's name in the database) on each course are deleted at the end of each course. These documents should be printed off and stored with other student forms and then deleted from the computer.

Once every year the registrar together with an Assistant Teacher should look at the stored course forms and remove all course forms for any courses that took place more than 10 years ago. These forms should be completely destroyed, for example in a paper shredder."

Instructions given to Course Managers and Centre Office Managers regarding the Data

The following text is used to ensure that Course Managers and Centre Office Managers know how to deal with the data.

" These forms may contain sensitive data regarding students and Dhamma Servers. The data may not be copied without the permission of an Assistant Teacher. The data may not be given to anyone other than an Assistant Teacher, a Course Manager or a Centre Office Manager. A Course Manager or a Centre Office Manager may read only pages 1 and 4 of the Registration Form. Only Assistant Teachers may read pages 2 and 3. You may not read the Application Forms (other than the names, ages and gender), the Medical Questionnaires or the Practices in Conflict Questionnaires. The data may never be used for commercial purposes by the Trust, the centre or anyone else. The data may be shown to the student who gave the data under certain circumstances. These circumstances are given in the Data Protection Policy."

Instructions given to Translators regarding the Data

The following text is used to ensure that Translators know how to deal with the data.

"These forms may contain sensitive data regarding students and Dhamma Servers. You may only provide a translated version of what is in the forms for use by the Assistant Teacher or Registrar. You must never retain any data yourself or convey any data to anyone other The Assistant Teacher and the Registrar."

Instructions given to Assistant Teachers regarding the Data

The following text is used to ensure that Assistant Teachers know how to deal with the data.

“These forms may contain sensitive data regarding students and Dhamma Servers. The sensitive data such as medical information may not be given to others except in the case of medical emergency or to a lawyer for legal reasons. The non-sensitive information such as address data may be given to others to assist students in their meditation (for example giving the name and address to an authorized newsletter in this tradition). The Assistant Teacher, the Trust, the centre or anyone else may never use the data for commercial purposes. The data may be shown to the student who gave the data under certain circumstances. These circumstances are given in the Data Protection Policy.

Once every year the registrar will ask for supervision while forms more than 10 years old are destroyed. Ensure that the forms are taken and destroyed without reading or copying.”

Notes taken by Assistant Teachers

In rare cases, the Assistant Teacher(s) may process notes referring to students on a separate list. Such a list can be kept electronically or manually. The data is kept strictly confidentially and will be accessible only to Assistant Teachers and to some extent Registrars. The purpose of sharing these notes is to enable other Assistant Teachers to support students on future courses, and in rare cases restricting students from attending future courses. The notes may in rare cases include information on health and medication. Such notes are only to be processed when this is absolutely necessary and should not be kept for longer than required. The notes will not include sensitive data unless the student has consented to this, for example by signing the registration form.

The electronic list of notes will be maintained by a list master, who is appointed to fulfil this task by S. N. Goenka or his representative. Manual lists, in case such are kept, are maintained by the Registrar at the centre where the list is kept.

Each Assistant Teacher is responsible for the entries that they make and shall be regarded as the owner of that data.

Rights of Access of Students and Dhamma Servers to their own Data

Someone who believes that the centre has stored information that he/she has provided may view a copy of that information, if it actually exists. Such a person must provide the centre with his/her name and the dates of the course which he/she applied for in writing, together with a copy of suitable identification (for example a drivers license.) The copy of the data may be picked up after one month from the date of the request, upon production of the identification document.

Someone who wishes to correct data regarding him/herself which is held by the centre must provide a copy of the data as currently held (obtained as described above) and a written request containing the changes, together with identification. The decision as to whether to accept the change or not will be made by an Assistant Teacher and conveyed to the applicant within a period of one month. If the changes are not accepted then the reasons for non-acceptance will be given.

Right of access of Students and Dhamma Servers to their own data shall also apply to notes that are taken by Assistant Teachers and that are processed according what is mentioned above under “Notes taken by Assistant Teachers”.