

ADDENDUM 1 · TO THE GENERAL TERMS AND CONDITIONS

Privacy Policy

How Inner Sanctum collects, uses and protects your personal data,
in accordance with Regulation (EU) 2016/679 (GDPR).

Inner Sanctum Lda.
Avenida de São Martinho nr 842
4730-520 São Martinho Valbom, Braga distrito, Portugal



Who we are

Inner Sanctum Lda. ("Inner Sanctum", "we", "our" or "us") is committed to protecting the privacy and personal data of participants, clients, partners, website visitors and all individuals with whom we interact.

For the purposes of Regulation (EU) 2016/679 ("GDPR"), Inner Sanctum Lda. acts as Data Controller regarding the personal data processed in connection with its retreats, coaching programmes, events and related services.

Address: Avenida de São Martinho nr 842, 4730-520 São Martinho Valbom, Braga distrito, Portugal

Email: Joyce@inner-sanctum.com

Website: Inner-Sanctum.com

Personal data we collect

Depending on the nature of the relationship, we may collect:

IDENTIFICATION DATA

- name
- nationality
- date of birth
- gender (where voluntarily provided)

CONTACT DATA

- email address
- telephone number
- postal address

BOOKING INFORMATION

- retreat registrations
- invoices
- payment confirmations

PARTICIPATION INFORMATION

- intake questionnaires
- participant preferences
- dietary requirements
- accommodation preferences

EMERGENCY INFORMATION

- emergency contact details supplied by participants

MARKETING INFORMATION

- newsletter subscriptions
- communication preferences

TECHNICAL INFORMATION



- IP address
- browser information
- website usage data
- cookies and analytics data

Special category data

Inner Sanctum does not intentionally collect health data or other special categories of personal data unless: voluntarily provided by the participant; required for participant safety; required by law; or expressly consented to by the participant. Where such information is processed, appropriate safeguards shall be applied.

Purposes of processing

Personal data may be processed for the following purposes:

- Retreat administration and participant management
- Contract performance
- Invoicing and accounting obligations
- Customer support
- Participant safety and emergency management
- Compliance with legal obligations
- Marketing communications (subject to consent where required)
- Improvement of services and participant experience
- Protection of legal rights and dispute management

Legal basis for processing

Processing may be based on one or more of the following legal grounds:

- performance of a contract
- compliance with legal obligations
- legitimate interests pursued by Inner Sanctum
- consent of the data subject
- protection of vital interests

Photographs and video recordings

Photographs, videos and recordings shall only be used where the participant has provided consent, or another lawful basis exists under applicable law. Separate Photography and Media Release Consents may be requested. Participants may withdraw consent at any time.

Who receives your data

Personal data may be shared with: accommodation providers; transport providers; accountants; legal advisers; IT service providers; payment processors; public authorities where legally required.



Personal data shall never be sold to third parties.

International transfers

Where personal data is transferred outside the European Economic Area (EEA), Inner Sanctum shall ensure appropriate safeguards in accordance with the GDPR, including adequacy decisions, Standard Contractual Clauses, and other lawful transfer mechanisms.

Data retention

Personal data shall only be retained for as long as necessary. Indicative retention periods:

- Contractual documentation: 10 years
- Accounting records: 10 years
- Marketing subscriptions: until withdrawal of consent
- Participant records: for the period reasonably necessary for operational, legal and liability purposes

Data security

Inner Sanctum implements appropriate technical and organisational measures designed to protect personal data against: unauthorised access; loss; destruction; disclosure; alteration.

Your rights

Under applicable law, data subjects may exercise the following rights:

- right of access
- right of rectification
- right of erasure
- right to restriction of processing
- right to data portability
- right to object
- right to withdraw consent
- right not to be subject solely to automated decision-making

Requests may be sent to: Joyce@inner-sanctum.com

Complaints

If you believe that your personal data has been processed unlawfully, you have the right to lodge a complaint with the competent supervisory authority.

For Portugal: Comissão Nacional de Proteção de Dados (CNPd) — www.cnpd.pt

Cookies



Our website may use cookies and similar technologies to improve functionality, user experience and analytics. Additional information may be provided through a separate Cookie Policy.

Changes to this policy

Inner Sanctum reserves the right to amend this Privacy Policy at any time. The most recent version shall always be available on our website.

Contact

Questions concerning this Privacy Policy may be addressed to: Inner Sanctum Lda. — Email: Joyce@inner-sanctum.com

Participant name

Participant signature

Date





Inner Sanctum

Nurture Yourself