

# PRIVACY POLICY

*pursuant to Articles 13 and 14 of EU Regulation 2016/679 (GDPR)  
and Italian Legislative Decree 196/2003 (Privacy Code) as amended by Legislative Decree  
101/2018*

Last updated: March 2026

## 1. Data Controller

The Data Controller for your personal data is:

**Name:** Stefania Gobbi

**Email:** [stefania@vinyasapisa.com](mailto:stefania@vinyasapisa.com)

**Website:** <https://vinyasapisa.com>

The Data Controller has not appointed a Data Protection Officer (DPO) as the conditions set out in Article 37 of the GDPR are not met. For any enquiry regarding the processing of your personal data, please contact the Data Controller at the email address indicated above.

## 2. Categories of Personal Data Processed

### 2.1 Identification and contact data

Name, surname, address, phone number, email address, tax identification code (codice fiscale, where required for invoicing purposes).

### 2.2 Health data (special categories under Article 9 GDPR)

Information regarding physical conditions, medical conditions, previous injuries, pregnancy status, functional limitations, or any other condition relevant to the safe practice of yoga, as provided by the Data Subject through the health declaration and consent form.

### 2.3 Data of minors

For clients under 18 years of age, the identification data of both the minor and the parent or legal guardian providing consent are collected. Consent for the processing of personal data of minors is always obtained from the parent or legal guardian, in accordance with Article 2-quinquies of Legislative Decree 196/2003 and Article 8 of the GDPR.

Pursuant to Article 2-quinquies(2) of Legislative Decree 196/2003, this privacy policy is written in clear, simple language that is easily understandable, including by minors. The Data Controller is available to provide further clarification in simplified form upon request.

### 2.4 Browsing data

When using the website [vinyasapisa.com](https://vinyasapisa.com), technical data such as IP address, browser type, operating system, pages visited, and visit duration may be collected. The Website may use technical cookies necessary for its operation; any profiling cookies will only be installed with the user's prior consent, in compliance with applicable legislation.

## 3. Purposes and Legal Bases for Processing

Your personal data is processed for the following purposes:

Purpose	Data processed	Legal basis	Retention
Performance of the service contract (booking, management, and delivery of yoga lessons)	Identification and contact data	Art. 6(1)(b) GDPR — Contract performance	Duration of relationship + 10 years (Art. 2946 Italian Civil Code)
Tax and accounting obligations (invoicing, mandatory accounting records)	Identification data, tax code	Art. 6(1)(c) GDPR — Legal obligation	10 years (Art. 2220 Italian Civil Code)
Assessment of physical fitness and safe yoga practice	Health data	Art. 6(1)(a) and Art. 9(2)(a) GDPR — Explicit consent	Duration of relationship + 10 years
Operational communications (lesson confirmations, schedule changes, notices)	Contact data	Art. 6(1)(b) GDPR — Contract performance	Duration of relationship
Legal defence or dispute management	All relevant data	Art. 6(1)(f) GDPR — Legitimate interest	Until expiry of the limitation period

## 4. Consent for Health Data

The processing of health-related data is subject to your explicit consent, provided by signing the separate form entitled “Consent for the processing of health data and fitness declaration.”

Consent is freely given, specific, informed, and may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal. However, please note that without consent to process health data, the Data Controller will be unable to provide yoga lessons under safe conditions and may therefore decline to provide the service.

## 5. Recipients and Categories of Recipients

Your personal data will not be disclosed to or shared with third parties for marketing purposes. It may be communicated exclusively to the following parties, to the extent strictly necessary:

**Accountant / tax advisor:** for mandatory accounting and tax compliance.

**Insurance company (Markel Insurance SE via exali.com):** only in the event of an incident or compensation claim, for claims management purposes.

**IT service providers:** website administrators, hosting services, email providers, acting as data processors under Article 28 GDPR.

**Competent authorities:** where required by law.

## 6. Transfer of Data Outside the EU/EEA

The use of communication tools such as WhatsApp (Meta Platforms, Inc.) and hosting services may result in the transfer of your data to countries outside the European Union or the European Economic Area, particularly the United States of America.

In such cases, the transfer is carried out on the basis of an adequacy decision by the European Commission (Article 45 GDPR), where available, or on the basis of Standard Contractual Clauses approved by the

European Commission (Article 46(2)(c) GDPR) or other safeguards provided for by the GDPR. For further information, please contact the Data Controller.

## 7. Data Retention Periods

Personal data is retained for the time strictly necessary to fulfil the purposes for which it was collected, in compliance with the principle of data minimisation (Article 5(1)(e) GDPR):

Data category	Retention period	Legal reference
Tax and accounting documents (invoices, receipts)	10 years from registration	Art. 2220 Italian Civil Code; Art. 8(5) L. 212/2000
Contractual documentation	Duration of relationship + 10 years	Art. 2946 Civil Code (standard limitation period)
Health data (health questionnaire)	Duration of relationship + 10 years	Accountability principle; defensive needs
Proof of consent	Duration of relationship + 10 years	Art. 7(1) GDPR; accountability principle
Medical certificates (if requested)	Duration of validity + 2 years	Prudential practice

Once the above periods have expired, personal data will be deleted or irreversibly anonymised.

## 8. Data Subject Rights

As a data subject, you have the right to:

**Access (Art. 15 GDPR):** obtain confirmation of whether your data is being processed and access its content.

**Rectification (Art. 16 GDPR):** obtain correction of inaccurate data or completion of incomplete data.

**Erasure (Art. 17 GDPR):** obtain deletion of your data in the cases provided for by law.

**Restriction (Art. 18 GDPR):** obtain restriction of processing in the cases provided for by law.

**Portability (Art. 20 GDPR):** receive your data in a structured, commonly used, and machine-readable format.

**Objection (Art. 21 GDPR):** object at any time to processing based on legitimate interest.

**Withdrawal of consent (Art. 7(3) GDPR):** withdraw consent at any time, without affecting the lawfulness of processing based on consent given before the withdrawal.

To exercise your rights, please send a written request to: [stefania@vinyasapisa.com](mailto:stefania@vinyasapisa.com).

You also have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali, [www.garanteprivacy.it](http://www.garanteprivacy.it)) if you believe that the processing of your personal data is in violation of the GDPR.

## 9. Mandatory or Voluntary Nature of Data Provision

The provision of identification and contact data is necessary for the conclusion and performance of the service contract. Failure to provide such data will make it impossible to deliver the service.

The provision of tax data (codice fiscale) is mandatory under applicable tax legislation.

The provision of health data is voluntary; however, failure to provide it will prevent the Data Controller from assessing the Data Subject's suitability for yoga practice and may result in the refusal to provide the service for safety reasons.

## **10. Automated Decision-Making**

Your personal data is not subject to automated decision-making, including profiling, as referred to in Article 22 of the GDPR.

## **11. Record of Processing Activities**

The Data Controller maintains a record of processing activities pursuant to Article 30 of the GDPR, in view of the non-occasional processing of health data (special categories under Article 9 GDPR), in compliance with the guidance provided by the Italian Data Protection Authority.

## **12. Security Measures**

The Data Controller adopts appropriate technical and organisational measures to ensure a level of security appropriate to the risk, pursuant to Article 32 of the GDPR, including: password protection and authentication systems on devices, storage of paper documents in locked premises, use of encrypted connections for electronic communications, and restriction of data access to the Data Controller only.