



# Northwest Vipassana Association

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## Privacy Policy Disclosure Document

This document concerns the collection, storage and viewing of the information given by students in connection with a Vipassana course that is contained in the following documents:

- Students/Dhamma Server Application Form
- Students/Dhamma Server Registration Form
- Medical Questionnaires
- Medical Waivers
- Practices in Conflict Questionnaires

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

The owner of the data is the Northwest Vipassana Association, a Washington non-profit Corporation, whose address is 445 Gore Road, Onalaska, WA 98570. The owner is referred to in this document as **The Center**.

### Definitions of Other Terms That are used in this Document

**Assistant Teacher:** anyone who has been appointed by S.N. Goenka or his authorized representative(s) to conduct Vipassana meditation courses or an appointed Assistant Teacher in training to conduct courses.

**Student:** anyone who applies to come to a Vipassana meditation course.

**Old Student:** anyone who has completed at least one ten-day course of Vipassana meditation under S.N. Goenka or one of his Assistant Teachers.

**Registrar:** an old student asked by an Assistant Teacher or the Center to process application forms for a Vipassana course.

**Course Manager (male or female manager):** an old student who has been asked by an Assistant Teacher to manage or assist with a Vipassana meditation course, or a part thereof.

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

**Dhamma Worker:** an old student who offers to help on a course or at a center.

**Registration Form Sensitive Information:** mental or physical health problems, medication, experience with

other techniques, drug and alcohol experience, and biographical information.

**Registration Form General Information:** All information on the **Registration Form** not listed under Registration Form Sensitive Information.

### Purpose of Collecting the Data

To enable the Assistant Teacher to assess if a student is suitable to be accepted for a course and to enable the registrar(s) to plan accommodation, food and sometimes transport for the student.

To enable proper guidance and assistance to be given to students during and after a Vipassana course.

To provide a record of students who have attended courses offered by the Center.

### Collection of Data

The Registrar collects application Forms and sometimes Medical Questionnaires and Waivers or/and Practices in Conflict Questionnaires before a student/Dhamma Worker is admitted to a course. Students give information voluntarily. The Course Manager collects registration forms from students on arrival at the course site.

### Viewing of Data

The Application Forms may be read by the Registrar(s), the Assistant Teacher(s) conducting the course or another Assistant Teacher who can give input related to or approval for acceptance to a course.

The Medical Questionnaires and Waivers may be read by the Registrar, the Assistant Teacher(s) conducting the course or another Assistant Teacher who can give input related to or approval for acceptance to a course.

The Practices in Conflict Questionnaire may be read by the Assistant Teacher(s) conducting the course or another Assistant Teacher who can give input related to or approval for acceptance to a course.

Registration Form General Information can be read by the Course Manager, the Center Office Manager and the Assistant Teacher(s).

Registration Form Sensitive Information can be read only by an Assistant Teacher.

## **Reasons for Storage of Data**

The Data are stored for the following reasons:

To provide a record of the course.

To enable help to be given to students in the future.

To enable management of the admission of students to future courses.

For legal reasons.

## **Storage of Data**

Application Forms are received by e-mail, fax and US mail, and are saved (or scanned) onto a password-protected centralized computer which is located at a professional server hosting facility. Application forms are printed just before a course and attached to the registration forms students fill out on the first day of the course. From this time forward, the forms are kept in the Assistant Teacher's residence, stored in a secure file cabinet for a period of five years, after which they are destroyed. They can be accessed only by Assistant Teachers or, at times, the Center Office Manager, acting under instructions from an Assistant Teacher.

## **Instructions Given to Registrars Regarding the Data**

"These forms contain sensitive data regarding students and Dhamma Workers. 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 Center Office Manager. To assist with management of the course, some or all of the data from these forms may be entered into a computer. The data may never be used for commercial purposes by the Center or anyone else."

## **Instructions Given to Course and Center Managers Regarding the Data**

"These forms contain sensitive data regarding students and Dhamma Workers. 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 Center Office Manager. You may not read the Medical Questionnaires and Waivers, the Practices in Conflict Questionnaires or the Application Forms (other than the general student information and to check that all blanks are completed). The data may never be used for commercial purposes by the Center or anyone else."

## **Instructions Given to Assistant Teachers regarding the Data**

"These forms contain sensitive data regarding students and Dhamma Workers. 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 data may never be used for commercial purposes by the Center or anyone else. The data may be shown to the student who gave the data under certain circumstances. These circumstances are given in the Rights of Access of Students and Dhamma Workers to Their Own Data" (see paragraphs below).

## **Rights of Access of Students and Dhamma Workers to Their Own Data**

Someone who believes that the center 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 center 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 driver's license.) However, where providing access would reveal information generated within the Center in connection with a sensitive decision-making process, the Center may give the individual an explanation for the decision not to allow access, rather than direct access to the information. Where a copy of the data is to be produced it may be picked up after one month from the date of the request, upon production of the identification document.

If the Center has given an individual such an explanation of why it will not produce the data and the individual believes that direct access to the information is necessary to provide a reasonable explanation of the reasons for the decision, the Center will, at the request of the individual, undertake a review of the decision to give an explanation rather than direct access to the information. Personnel other than the original decision-maker will undertake the review.

Someone who wishes to correct data regarding him/herself which is held by the center 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 after one month. If the changes are not accepted then the reasons for non-acceptance will be given.