



**Wittering Academy**  
Riding Club

**Data Protection**

**Privacy Policy**

**Wittering Academy Riding Club**

## Data protection

Keeping your personal information safe is very important to us. We are committed to complying with privacy and data protection laws and being transparent about how we process personal data.

We have policies, procedures and training in place to help our members and volunteers understand their data protection responsibilities and to help them follow the data protection principles.

We have a nominated member of the committee who serves as our Data Protection Lead. If you have any questions regarding our Privacy Policy, please email [h.mcintosh@ntlworld.com](mailto:h.mcintosh@ntlworld.com).

This privacy policy relates to our use of any personal information we process about you.

## How we collect personal data

We may collect your personal data in different ways, for example:

- when you, your parent or guardian, communicate with us by post, telephone, SMS, email or via our website
- as you interact with us in other ways; as a contractor, or in any other capacity
- from your membership application
- from entries to our events
- from an accident form
- complaints from
- safeguarding issue

## How we use personal information

We collect and use personal information about our members, supporters and volunteers for different purposes.

[List purposes here. This should be the list of purposes from your Personal Information Asset Register. Some examples are listed below.

**Membership applications, administration and renewals**

**Mentoring lists**

**Running events and camps**

**Dealing with accidents**

**Running team events**

**Newsletters and post to WARC website**

**Dealing with complaints and appeals**

**Dealing with safeguarding issues**

**Processing expenses and payments**

We only collect personal information that we legally require.

This may include:

- Contact details such as name, address, email address and contact phone numbers
- Date of birth and gender
- Dietary requirements where this is required for catering
- Qualifications
- Name of your parent or guardian (if you are under 18)
- Name and contact details of any next of kin where you are attending an event and are riding / carriage driving)
- Nationality

**Membership applications, administration and renewals**

We will use the information that you provide to us to process your membership application and renew your application, if appropriate. We will email and post you information about events, courses, our services and other items of interest as part of your membership. You can opt out or unsubscribe from receiving this information if you wish. Our legal basis for using your personal information in this way is for the performance of a contract.

V1

April 2018

**Commented [FB1]:** Would be good to be able to click on this text to expand and see the list below

**Commented [FB2]:** Click on each bullet for more information (provided further on in this document)

**Commented [FB3]:** Click here to see bullet point list

**Commented [FB4]:** Click on each bullet for more information (provided further on in this document)

#### Informing non-members about **Wittering Academy Riding Club** events and services

If you opt in to our mailing list we will use the information that you provide to email and post you information about our events, courses, our services and other items of interest. You can opt out or unsubscribe from receiving this information at any time, if you wish. Our legal basis for using your personal information in this way is consent.

#### Running events and camps

If you register for one of our events or camps, we will use your information provided to us to process your registration and enable you to attend the event or camp. Your information may be shared with the event organiser and other third parties. Our legal basis for using your personal information in this way is for the performance of a contract.

#### Dealing with complaints and appeals

If a complaint or an appeal is raised with us, we will process the personal information that is provided to us in order to manage and resolve the complaint or appeal. This may include sharing relevant information with an affiliated organisation, such as the BEF, or a riding club, a coach, welfare officer or other organisation, depending upon the nature of the complaint and the area to which it relates. Our legal basis for using personal information for this purpose is to fulfil our legitimate interest and fulfil our objective of resolving complaints in a careful and appropriate manner. For further details see our website [www.witteringacademy.com](http://www.witteringacademy.com) for our complaints policy.

#### Undertaking safeguarding activities

When necessary, we process relevant personal information about members, volunteers and coaches for safeguarding purposes. It may be necessary to share some personal information with relevant authorities such as the police, The Safeguarding Advisory Board and an appropriate member of the respective Member Body – such as the BEF, the Pony Club or a BRC Riding Club (as appropriate to the safeguarding activity). Our legal basis for this processing is to meet our legal obligations. For further details see our website [www.witteringacademy.com](http://www.witteringacademy.com) for our complaints policy.

#### Processing expenses

We will use your personal information including your bank account details to process expense claims. Our legal basis for using your information for this is for the performance of a contract.

#### Horse passports

If you enter a BRC qualifier we will process the horse's passport to check the horse's eligibility, but this information will not be retained on our records.

### Cookies and aggregate information collected from

[www.witteringacademy.com](http://www.witteringacademy.com)

We use cookies and log files on our website to store information about how you use our website. A cookie is a piece of data stored on the user's computer tied to information about the user. This

information may include the user's Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), referring / exit pages, platform type, date / time of visit, number of clicks, error pages and number of unique visits.

This information is not linked to any personal profiles or to any personally identifiable information provided by users. We use it to analyse visitor trends and use of our website, to administer the website and to gather broad demographic information of our website users. Our legal basis for using your information in this way is for our legitimate interest.

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## Our legal basis for processing personal information

Our legal basis for the purposes that we process personal information is for the performance of a contract, or for our legitimate interests or consent.

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We may process personal information because it is necessary for the performance of a contract to which you are a party (or to take steps at your request prior to entering a contract). For example, we may process your personal data:

- To issue or administer a membership
- To administer an event e.g. publishing riding times on our website

We will only process your personal data for the performance of a legitimate contract for a specific and lawful purpose.

## Your rights

If you no longer wish to receive communications about products and services from us, please contact the WARC secretary. You can also unsubscribe at any time to emails that we may send to you about the products and services that we think will be of interest to you.

You also have the right to:

- Request a copy of the information we hold about you. Requests should be addressed to [h.mcintosh@ntlworld.com](mailto:h.mcintosh@ntlworld.com). We will respond within 30 days of receiving your written request.
- Tell us to change or correct your personal information if it is incomplete or inaccurate. Please contact us at [h.mcintosh@ntlworld.com](mailto:h.mcintosh@ntlworld.com).
- Ask us to restrict our processing of your personal data or to delete your personal data if there is no compelling reason for us to continue using or to hold this information. Please contact us at [h.mcintosh@ntlworld.com](mailto:h.mcintosh@ntlworld.com).
- Receive from us the personal information we hold about you which you have provided to us, in a reasonable format specified by you, so that you can send it to another organisation. Please contact us at [h.mcintosh@ntlworld.com](mailto:h.mcintosh@ntlworld.com).
- Object, on grounds relating to your specific situation, to any of our processing activities where you feel this has a disproportionate impact on you. Please contact us at [h.mcintosh@ntlworld.com](mailto:h.mcintosh@ntlworld.com).
- You have the right to withdraw consent for WARC to use your personal data at any time.

- You have the right to be forgotten within the parameters of WARC legal requirements in complying with government regulations and insurance purposes.

Please note that we may be entitled to refuse requests where exceptions apply: for example, if we have reason to believe that the personal data we hold is accurate or we can show our processing is necessary for a lawful purpose set out in this Privacy Policy.

We may also share your information with our bank to process a payment or expenses, with any professional advisers (such as our accountant) where it is necessary to obtain their advice; and our IT support and data storage providers.

Where required, we will process personal information to comply with our legal and contractual obligations. In this respect we may use your personal data to comply with subject access requests, tax legislation; for the prevention and detection of crime; and to assist the police and other competent authorities with investigations including criminal and safeguarding investigations.

## Transferring personal data outside of the EEA

No personal information is sent outside of the EEA

## For how long do we keep your personal information?

We will only retain your personal information for as long as legally necessary e.g. for financial, safeguarding and insurance purposes.

- We will keep membership records for 3 years in order to administer our membership scheme and for HMRC purposes.
- We will keep event and camp details for 3 years in order to administer the event and for HMRC purposes.
- We will keep records of accidents for 3 years for seniors and indefinitely for persons under the age of 18 in order to facilitate any insurance claim resulting from the activity.
- We will keep safeguarding records for a maximum of 3 years to comply with government guidelines.
- We will keep payment & expenses for HMRC purposes.

## Changes to this policy

This Privacy Policy may change from time to time. Where practical we will provide you with an updated Privacy Policy from time to time. However, we also recommend that you please visit this webpage periodically to keep up-to-date with the changes in our Privacy Policy.

## Making a complaint regarding data protection to the Information Commissioner's Office

If you are not satisfied with our response to any General Data Protection Regulation (GDPR) query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113**.