



**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 employees and volunteers understand their data protection responsibilities and 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 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 genuinely need.

This may include:

- Contact details such as name address, email address and 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. This will include sharing some of your information with our volunteers that run the event or camps. It may also include collecting and sharing medical information with them if you choose to provide that to us. Our legal basis for using your personal information in this way is for the performance of a contract.

If you choose to provide us with your dietary requirements we may share them with third parties that we use to provide catering at our events.

#### 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 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 it relates to. 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.

#### Undertaking safeguarding activities

When necessary, we process relevant personal information about members, volunteers, coaches and employees 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.

#### Processing payments and 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.

#### Instructor checks

If you provide us with information about yourself, such as a resume or curriculum vitae, in connection with a job or volunteer application or enquiry, we may use this information to process your enquiry. We will not store this information for any purpose other than that relating to your application. Our legal basis for using your information in this way is for our legitimate interest.

### Horse passports

If you enter a BRC qualifier we will process the horse's passport to check the horse's eligibility.

## Cookies and aggregate information collected from

**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 enables us to create a profile which details your viewing preferences. We use your profile to tailor your visit to our website, to make navigation easier and direct you to information that best corresponds to your interests and country.

Aggregate information is collected from users using our own web tracker. This information includes users' 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 personal profiles or to personally identifiable information provided by users. We use it to analyse visitor trends and use of our website, 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.

**Commented [FB6]:** Would be good if you could click on each of the three conditions to view the detail which follows.

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 eg publishing riding times on our website
- To book and pay for instructors

We may collect and use your personal data if it is necessary for our legitimate interest and so long as its use is fair, balanced and does not unduly impact your rights.

We will ask for your consent to send you marketing emails and text messages. You can withdraw consent for this at any time.

Usually we will only process sensitive personal data if we have your explicit consent. In extreme situations, we may share your personal details with the emergency services if we believe it is in your 'vital interests' to do so. For example, if someone is taken ill during one of our events.

## Sharing personal information

We will only share your personal information where we are required to fulfil our contract with you, or legitimate interest, where we have your consent, or we are required to do so by law.

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We may share your personal information with third party organisations who will process it on our behalf, for example a mailing house, our website administrator or printers.

If necessary, we may also share your information with caterers, course providers, referees, and coaches.

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

We process employee personal information to fulfil our contracts with our employees and meet our legal obligations as an employer.

Where required, we will process personal information to comply with our legal 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

## Your rights

If you no longer wish to receive communications about products and services from us, please contact [insert an email address that can be used for contact preference updates]. 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. 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 [insert an email address that can be used for contact preference updates]
- 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 holding this information. Please contact us at 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
- 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.

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.

## How long we keep your personal information

We will hold your personal information for as long as is necessary. We will not retain your personal information if it is no longer required. In some circumstances, we may legally be required to retain your personal information, for example for finance, employment or audit purposes.

**Commented [FB8]:** Would be good to click here to view the retention period detail.

[Tailor this section to your organisation. We have left one example here to get you started. Look at all the rows in your Personal Information Asset Register and create a bullet point here to match]

- 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, in order to facilitate any insurance claim resulting from the activity.
- We will keep records of team events for 3 years, in order to facilitate the running of the event and HMRC purposes
- We will keep details for marketing purposes and advertising our club for 3 years.
- We will keep safeguarding records for a maximum of 3 years in order to
- We will keep payment & expenses as long as we need to make payments
- We will keep horse passports for 1 week until the flu vacs dates have been checked and entered on the horse's database
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## 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 to the Information Commissioner's Office

If you are not satisfied with our response to any 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**.