



Melksham Road, Holt, Near Trowbridge, Wilts BA14 6QT

Tel: 01225 783220 Mobile: 07855 464075 Web Site: www.westwilts.com

GENERAL DATA PROTECTION REGULATIONS

West Wilts Equestrian Centre General Statement

With effect from the 25 May 2018 the new General Data Protection Regulations (GDPR) come into force. West Wilts Equestrian Centre (WVEC) is the data controller for the personal information you provide for the purpose of:-

- a) Administrating the performance of the contract and legal obligations for entering competitions held at WVEC
- b) Judging or officiating at WVEC competitions
- c) Volunteering at WVEC competitions

WVEC is the Data Controller – Amanda King is the Data Protection Officer and can be contacted at info@westwilts.com

Enforcement of GDPR (as with the DPA) is in the hands of the Information Commissioners Office (ICO) <https://ico.org.uk/for-organisations> , who will investigate data breaches and non-compliance.

Data we may collect about you

- Identity Data - includes first name, last name, title and date of birth where required.
- Contact Data includes address, email address and telephone numbers.
- Transaction Data, including billing address and references for payments made to enter events.

Information provided by you will be used for the administration and running of events. Personal data held by WVEC may be shared with relevant Equestrian Governing Bodies who are classed as Joint Data Controllers, as required and as listed below. (N.B This list is not exhaustive)

Avon Vale Pony Club
Area 9 – British Riding Club
British Dressage
British Eventing
British Show Jumping and Blue Chip
Cricklands
Equine Affairs
The Pony Club including Dengie Qualifiers
Trailblazers

We will not share your data with any other third parties unless we are required to do so by law. WEST WILTS EC System Protection includes - Robust Anti-Virus Protection – Firewalls – 24 hours “I-cloud Back up” - Encrypted files – “Lock it” Policy.

WVEC will contact you annually regarding your continued consent for us to continue to store your data. For Further information about how WVEC uses your personal data, including your rights, please see our Privacy Notice and additional information.



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Your Rights – Privacy Notice

You have the right to request that West Wilts EC cease processing your personal data in relation to any service. Where possible, West Wilts EC will seek to comply with your request, however, ceasing to process your information may cause delays or hinder the centre's ability to provide services to you. There may be some situations where it will not be able to do this, e.g. where West Wilts EC is required to hold or process information to comply with a legal requirement or obligation.

You are also legally entitled to request access to any personal information held by West Wilts EC about yourself. Again, West Wilts EC will seek to comply with your request but there may be some situations where it may not be able to do this in full, e.g. where information held was given in confidence, and to do so will disclose the source, contrary to a third party's privacy rights. For further information about either requesting access to your personal data or to cease processing personal data please contact the centre's Information data protection officer.

While West Wilts EC tries to ensure that any personal data it holds about you is correct, there may be situations where the information it holds is no longer accurate. If you find that this is the case, please contact the us so that any errors can be investigated and corrected, or your details updated.

West Wilts EC will not use your personal data for third party marketing purposes without your prior express consent.

West Wilts EC will not pass any personal data on to third parties, other than those who either process information on our behalf or because of a legal or financial requirement, and it will only do so, where possible, after West Wilts EC has ensured that sufficient steps have been taken to protect the personal data by the recipient.

West Wilts EC will not sell or rent your personally identifiable information to anyone, or use the data for any other purpose incompatible with the purpose for which it was originally collected. West Wilts EC will only send personally identifiable information about you to other companies when we have your consent or have a legal reason to do so. We may also use your information in response to subpoenas, court orders or other legal process. We will only hold your information for as long as necessary for these purposes.

WEST WILTS EC System Protection includes

Robust Anti-Virus Protection – Firewalls – 24 hours – "I cloud backup" – Encrypted files - "Lock it" Policy.



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Data Matching

Data matching involves comparing computer records held by one body against other computer records held by the same or another body to see how far they match. This is usually personal information.

WWEC undertakes data matching, where necessary, for a number of purposes, to comply with legal requirements placed on the centre.

Examples Include:

- To Detect and prevent crime/fraud
- Contact and transaction data from providers of technical, payment and delivery services.
- Assist in emergency response management
- Produce rider lists and results

Using your personal data

In deciding what personal data to collect, hold and use, WWEC is committed to ensuring that it will:

- Recognise that any personal data handled by WWEC is held on behalf of that person and that we ensure we respect that responsibility
- Adopt and maintain high standards in respect of the handling and use of that personal data
- Only collect, hold and use personal data where it is necessary and proportionate to do so
- Securely delete any personal data when no longer needed
- Keep your personal data secure and safe
- Not unnecessarily and without good reason, infringe the privacy of individuals
- Consider and address the privacy risks first when planning to use or hold personal information in new ways, such as when introducing new systems
- Be open with individuals about how we use their information and who we give it to
- Make it easy for individuals to access and correct their personal information
- Ensure that there are effective safeguards and systems in place to make sure personal information is kept securely and does not fall into the wrong hands
- Provide training to staff who handle personal information and treat it as a disciplinary matter if they misuse or don't look after personal information properly
- Put appropriate financial and human resources into looking after personal information to make sure we can live up to our promises
- Regularly check that we are living up to our promises and report on how we are doing

The centre may disclose personal data to third parties, but only where it is necessary, either to comply with a legal obligation, or where permitted under the Data Protection Act, e.g. where the disclosure is necessary for the purposes of the prevention and/or detection of crime, or where it is necessary to allow a third party working for or on behalf of the centre.



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The centre will strive to ensure that any personal data in its care will be kept safe and that where your information is disclosed to a third party, WWEC will seek to ensure that the third party has sufficient systems and procedures in place to prevent the loss of personal data.

Where the centre seeks to disclose sensitive personal data, such as medical details, to third parties, we will do so only with your prior express consent or where we are legally required to do

Privacy Information

We provide individuals with all the following privacy information:

- The name and contact details of our organisation.
- The name and contact details of our representative (if applicable).
- The contact details of our data protection officer (if applicable).
- The purposes of the processing.
- The lawful basis for the processing.
- The legitimate interests for the processing (if applicable).
- The categories of personal data obtained (if the personal data is not obtained from the individual it relates to).
- The recipients or categories of recipients of the personal data.
- The details of transfers of the personal data to any third countries or international organisations (if applicable).
- The retention periods for the personal data.
- The rights available to individuals in respect of the processing.
- The right to withdraw consent (if applicable).
- The right to lodge a complaint with a supervisory authority.
- The source of the personal data (if the personal data is not obtained from the individual it relates to).
- The details of whether individuals are under a statutory or contractual obligation to provide the personal data (if applicable, and if the personal data is collected from the individual it relates to).



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The details of the existence of automated decision-making, including profiling (if applicable).

When we provide the information

We provide individuals with privacy information at the time we collect their personal data from them.

If we obtain personal data from a source other than the individual it relates to, we provide them with privacy information:

within a reasonable of period of obtaining the personal data and no later than one month;

if we plan to communicate with the individual, at the latest, when the first communication takes place; or

if we plan to disclose the data to someone else, at the latest, when the data is disclosed.

How we provide it - We provide the information in a way that is:

concise;

transparent;

intelligible;

easily accessible; and

uses clear and plain language.

Changes to the information

We regularly review and, where necessary, update our privacy information.

If we plan to use personal data for a new purpose, we update our privacy information and communicate the changes to individuals before starting any new processing.

Best practice – drafting the information

We undertake an information audit to find out what personal data we hold and what we do with it.

We put ourselves in the position of the people we're collecting information about.



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We carry out user testing to evaluate how effective our privacy information is.

Best practice – delivering the information

When providing our privacy information to individuals, we use a combination of appropriate techniques, such as:

- a layered approach;
- data dashboards;
- just-in-time notices;
- icons; and
- mobile and smart device functionalities.

Preparing for requests for rectification

- We know how to recognise a request for rectification and we understand when this right applies.
- We have a policy for how to record requests we receive verbally.
- We understand when we can refuse a request and are aware of the information we need to provide to individuals when we do so.

Complying with requests for rectification

- We have processes in place to ensure that we respond to a request for rectification without undue delay and within one month of receipt.
- We are aware of the circumstances when we can extend the time limit to respond to a request.
- We have appropriate systems to rectify or complete information or provide a supplementary statement.
- We have procedures in place to inform any recipients if we rectify any data we have shared with them.



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Preparing for requests for erasure

- We know how to recognise a request for erasure and we understand when the right applies.
- We have a policy for how to record requests we receive verbally.
- We understand when we can refuse a request and are aware of the information we need to provide to individuals when we do so.

Complying with requests for erasure

- We have processes in place to ensure that we respond to a request for erasure without undue delay and within one month of receipt.
- We are aware of the circumstances when we can extend the time limit to respond to a request.
- We understand that there is a particular emphasis on the right to erasure if the request relates to data collected from children.
- We have procedures in place to inform any recipients if we erase any data we have shared with them.
- We have appropriate methods in place to erase information.

Preparing for requests for restriction

- We know how to recognise a request for restriction and we understand when the right applies.
- We have a policy in place for how to record requests we receive verbally.
- We understand when we can refuse a request and are aware of the information we need to provide to individuals when we do so.

Complying with requests for restriction

- We have processes in place to ensure that we respond to a request for restriction without undue delay and within one month of receipt.



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- We are aware of the circumstances when we can extend the time limit to respond to a request.
- We have appropriate methods in place to restrict the processing of personal data on our systems.
- We have appropriate methods in place to indicate on our systems that further processing has been restricted.
- We understand the circumstances when we can process personal data that has been restricted.
- We have procedures in place to inform any recipients if we restrict any data we have shared with them.
- We understand that we need to tell individuals before we lift a restriction on processing.

Controller and processor contracts checklist

Our contracts include the following compulsory details:

- the subject matter and duration of the processing;
- the nature and purpose of the processing;
- the type of personal data and categories of data subject; and
- the obligations and rights of the controller.

Our contracts include the following compulsory terms:

- the processor will only act on the written instructions of the controller (unless required by law to act without such instructions);
- the processor will ensure that people processing the data are subject to a duty of confidence;
- the processor will take appropriate measures to ensure the security of processing;
- the processor will only engage a sub-processor with the prior consent of the data controller and a written contract;
- the processor will assist the data controller in providing subject access and allowing data subjects to exercise their rights under the GDPR;



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- the processor will assist the data controller in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments;
- the will must delete or return all personal data to the controller as requested at the end of the contract; and
- the will must submit to audits and inspections, provide the controller with whatever information it needs to ensure that they are both meeting their Article 28 obligations, and tell the controller immediately if it is asked to do something infringing the GDPR or other data protection law of the EU or a member state.

As a matter of good practice, our contracts:

- state that nothing within the contract relieves the processor of its own direct responsibilities and liabilities under the GDPR; and
- reflect any indemnity that has been agreed.

Checklists for Legitimate Interests – I.e. Volunteers Data Base

- We have checked that “legitimate interests” is the most appropriate basis for holding our competition volunteer list.
- We understand our responsibility to protect the individual’s interests.
- We have conducted a legitimate interest assessment (LIA) and kept a record of it, to ensure that we can justify our decision.
- We have identified the relevant legitimate interests.
- We have checked that the processing is necessary and there is no less intrusive way to achieve the same result.
- We have done a balancing test and are confident that the individual’s interests do not override those legitimate interests.
- We only use individuals’ data in ways they would reasonably expect, unless we have a very good reason.



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- We are not using people's data in ways they would find intrusive or which could cause them harm, unless we have a very good reason.
- If we process children's data, we take extra care to make sure we protect their interests.
- We have considered safeguards to reduce the impact where possible.
- We have considered whether we can offer an opt out.
- If our Legitimate Interest Assessment identifies a significant privacy impact, we have considered whether we also need to conduct a Data Protection Impact Assessment.
- We keep our LIA under review and repeat it if circumstances change.
- We include information about our legitimate interests in our privacy information.