

HITCHMOUGH'S RIDING SCHOOL

Privacy Policy

Version: 2.0

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1. Who we are

Hitchmough Riding School Ltd, trading as Hitchmough's Equestrian Centre, of Highland Lodge, Monkstown, Co. Cork, company registration number **[CRO number]**, is the data controller for the personal data described in this policy. That means we decide why and how your personal data is used, and we are responsible for looking after it.

Keeping your personal information safe matters to us. We are committed to complying with data protection law and to being clear about what we do with your data.

Our Data Protection Lead is **Kenneth Twomey – 0858010394**. Any question about this policy, or any request about your data, should go to them.

We are not required to appoint a statutory Data Protection Officer under Article 37 of the GDPR, and our Data Protection Lead is not a Data Protection Officer. They are the person responsible internally for data protection at the riding school.

2. What this policy covers

This policy applies to everyone whose personal data we handle, including:

- riding clients and their parents or guardians;
- livery clients and horse owners;
- participants in camps, courses, shows and events, and their families;
- employees, self-employed instructors and coaches, contractors and volunteers;
- job and volunteer applicants;
- suppliers, vets, farriers and other professionals we deal with; and
- visitors to our premises and to our website and social media pages.

It sits alongside our Safeguarding Policy and our Social Media, Photography and Online Communication Policy, which contain further detail on safeguarding records and on images of children.

3. The law we work to

- The General Data Protection Regulation (EU) 2016/679 ("GDPR").
- The Data Protection Act 2018.
- The European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 (S.I. 336 of 2011), which govern cookies and electronic marketing.
- Guidance issued by the Data Protection Commission, including Children Front and Centre: Fundamentals for a Child-Oriented Approach to Data Processing, and the Commission's guidance on cookies and other tracking technologies.

Other legislation obliges us to hold certain data, including the Children First Act 2015, the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012–2016, the Safety, Health and Welfare at Work Act 2005, the Organisation of Working Time Act 1997 and tax legislation.

4. What we collect, and where we get it

We only collect personal data we genuinely need. Depending on your relationship with us, this may include:

Clients, riders and event participants

- Name, address, email address and phone numbers.
- Date of birth and, for riders under 18, the name and contact details of a parent or guardian.
- Name and contact details of a next of kin or second emergency contact.
- Height, weight and previous riding experience, so that we can allocate a suitable horse and lesson.
- Relevant medical information, allergies and medication, where you choose to give it to us.
- Dietary requirements for catered events.
- Photographs and video, where consent has been given.
- Payment and booking records.

Livery clients

- Contact and billing details, and details of your horse, its care requirements, veterinary and farriery arrangements, insurance and passport details.

Staff, contractors, volunteers and applicants

- Contact details, date of birth, PPS number, bank account details, tax and residency status.
- Qualifications, coaching accreditation, insurance and training records.
- Employment history and references from previous employers or educational institutions.
- Emergency contact and next of kin details.
- Health and medical information relevant to the role, including fitness to work and sickness absence.
- Garda vetting disclosures and information about criminal convictions.

Where the data comes from

Most personal data comes directly from you, or from your parent or guardian if you are under 18. We also receive data from:

- referees and previous employers, when we check references;
- the National Vetting Bureau, through Horse Sport Ireland, when we obtain Garda vetting;
- Horse Sport Ireland and other affiliated bodies, in relation to membership, competition entries and safeguarding matters; and
- in an emergency, from medical or emergency services.

Where we ask for data under a contract or under a legal obligation, we will tell you at the time. If you do not give us data we need, we may not be able to provide lessons, accept an entry, or employ you.

5. How we use your data, and our legal basis

We must have a lawful basis under Article 6 of the GDPR for everything we do with personal data. The table sets out our purposes and the basis for each.

Purpose	Whose data	Our lawful basis
Arranging and delivering lessons, including contacting riders about changes	Clients, parents	Performance of a contract
Allocating a suitable horse and lesson level	Riders	Performance of a contract
Running camps, shows, courses and events, including registration and supervision	Participants, parents	Performance of a contract
Providing livery services and liaising with vets, farriers and equine dentists	Livery clients	Performance of a contract
Taking payment and keeping accounting records	Clients, liveries	Performance of a contract Legal obligation (tax law)
Emergency contact and first aid	Riders, staff, visitors	Vital interests Explicit consent for health data given in advance
Safeguarding children, including Garda vetting, training records and reports to Tusla or An Garda Síochána	Staff, volunteers, contractors, children	Legal obligation (Children First Act 2015; National Vetting Bureau Acts 2012–2016) Substantial public interest
Handling complaints, appeals and disciplinary matters	Anyone involved	Legitimate interests — resolving complaints properly Legal claims where relevant
Employing and paying staff, and managing contractors and volunteers	Staff, contractors, volunteers	Performance of a contract Legal obligation (employment and tax law)
Recruitment and selection	Applicants	Steps prior to a contract Legitimate interests
Health and safety, accident and incident records	Anyone on the premises	Legal obligation Legitimate interests
Insurance, and defending or bringing legal claims	Anyone involved	Legitimate interests Legal claims
Marketing about our events, courses and services	Those who opt in	Consent, or the limited existing-customer exemption in section 11
Photographs and video for our website, social media and promotional material	Clients, riders	Consent
Website analytics and non-essential cookies	Website visitors	Consent
Security of the premises [if CCTV is in use]	Anyone on the premises	Legitimate interests

Where we rely on legitimate interests, we have considered whether our interest is fair and balanced and does not unduly affect your rights. You can ask us for details of that assessment, and you can object to processing on this basis.

6. Special category and criminal offence data

Some data needs extra protection: health information, and data revealing racial or ethnic origin, religion, trade union membership, sex life or sexual orientation, genetic or biometric data. Data about criminal convictions and offences is subject to further restrictions.

Where we handle this kind of data we rely on:

- your explicit consent, for medical and dietary information you choose to give us for lessons, camps and events;
- vital interests, where someone is injured or taken ill and we must share health information with emergency services and cannot obtain consent;
- employment and social protection law (Article 9(2)(b) GDPR and section 46 of the Data Protection Act 2018), for staff health, sickness absence and fitness to work;
- substantial public interest and our legal obligations under the Children First Act 2015 and the National Vetting Bureau Acts 2012–2016, for safeguarding and Garda vetting; and
- the establishment, exercise or defence of legal claims, where a claim is made or anticipated.

Garda vetting disclosures are held securely, seen only by those who need to see them, and are not used for any purpose other than assessing suitability for work with children.

We do not collect data about your race, ethnicity, religion or sexual orientation for recruitment or for any other purpose. [Delete this line and set out the basis and purpose if such data is in fact collected — for example for equality monitoring.]

7. Children's data

Many of our clients are under 18. Data protection law gives children's data particular protection, and the Data Protection Commission's Fundamentals for a Child-Oriented Approach to Data Processing set out how we are expected to handle it.

- Where consent is our basis for processing a child's data, we obtain it from a parent or guardian. Under section 31 of the Data Protection Act 2018 the digital age of consent in Ireland is 16, so a young person aged 16 or over may give their own consent for online services; below that age we go to the parent or guardian.
- A child is entitled to be told what we do with their data, in language they can understand, whatever the basis for processing and even where a parent gave consent on their behalf. We explain this to young riders in plain terms at enrolment and at camps.
- We do not send marketing to anyone we know to be under 18, and we do not profile children or use their data for advertising.
- A child may exercise their own data protection rights where they have the capacity to do so and it is in their best interests. Otherwise a parent or guardian may act on their behalf.
- We collect the minimum we need from children, and we do not require a social media account in order to take part in anything we run.
- Safeguarding records concerning a child are held separately and securely, and are covered by section 16 of our Safeguarding Policy.

8. Photographs and video

Photographs and video of an identifiable person are personal data. Images of children are handled under our Social Media, Photography and Online Communication Policy.

- We obtain written consent from a parent or guardian, and the agreement of the child, before taking or using any image of a child. Consent is specific to a stated use.
- Consent may be withdrawn at any time without giving a reason. We will stop using the image and remove it from our own platforms as soon as we reasonably can, though we cannot recover material already shared by others.

- Images are stored on centre systems, not on personal devices, and are retained only as long as the consent and our retention schedule allow.
- We do not upload images of children to third-party artificial intelligence or image-editing tools.

9. CCTV

We operate CCTV in the car parks (x2 cameras) and in the indoor area, for the security of the premises, horses, staff and clients, and for the investigation of incidents. Signs are displayed at every entrance and at each camera location, identifying us as the operator and giving contact details.

- Cameras are not installed in changing areas, toilets or any other private area, and are not positioned so as to record neighbouring property.
- Footage is retained for 28 days and then automatically overwritten, unless it is needed for a specific incident, complaint, insurance claim or investigation.
- Access is restricted to Ken Twomey (Director). Footage is disclosed to An Garda Síochána, our insurer or our legal advisers only where there is a proper basis for doing so, and every disclosure is recorded.
- You may request footage of yourself. We may need to obscure other people appearing in it.
- Our lawful basis is legitimate interests. We have carried out an assessment balancing that interest against the privacy of those recorded, and it is available on request.

10. Marketing

- We will ask for your consent before sending you marketing emails or text messages about our events, courses and services.
- Where you are already a customer, we may email you about similar services under the limited exemption in the ePrivacy Regulations, provided we gave you the chance to opt out when we collected your details and in every message since.
- Every marketing message includes an easy way to unsubscribe. You can also withdraw consent at any time by contacting our Data Protection Lead. Withdrawing consent does not affect any processing carried out before you withdrew it.
- We do not sell, rent or trade your data to anyone for their own marketing.
- We do not send marketing to anyone we know to be under 18.

11. Our website and cookies

Our website is **www.hitchmoughs.ie**. Cookies are small files placed on your device when you visit a website.

- Strictly necessary cookies are needed to make the site work — for example to remember what is in a booking form. These do not require your consent.
- All other cookies, including analytics, advertising and any cookie used to build a profile of your preferences, are only set if you consent through the banner shown when you first visit the site.
- You can accept some, all or none of the non-essential cookies, refusing them is as easy as accepting them, and you can change your choice at any time through the cookie settings link on the site.
- We keep a record of the consent given, and we ask again at least every six months.
- A full list of the cookies we use, what each does and how long it lasts, is in our Cookie Notice at [link].

Any analytics or tracking that identifies a device or builds a profile requires consent under the ePrivacy Regulations. We do not rely on legitimate interests for it.

12. Who we share your data with

We share personal data only where we have a lawful basis to do so. We may share with:

- vets, farriers, equine dentists and other professionals, in connection with the care of a horse;
- coaches, instructors and volunteers running a lesson, camp or event, including medical information relevant to a participant's safety;
- caterers, for dietary requirements at events;
- Horse Sport Ireland and other affiliated bodies, in connection with membership, vetting, competition entries and safeguarding matters;
- Tusla and An Garda Síochána, where we are required or permitted to report a child protection or welfare concern, or to assist an investigation;
- emergency services, where someone's life or health is at risk;
- our insurer and insurance brokers, and our legal advisers, in connection with a claim or potential claim;
- Revenue, and our accountants and payroll provider;
- our bank and payment providers;
- our IT, website, email, booking and data storage providers, and any mailing or printing supplier, who act as our processors under a written contract and may only use the data on our instructions.

We do not sell your personal data.

Where we use a messaging service such as WhatsApp for group communication about lessons or camps, your name and phone number will be visible to other members of that group. Tell us if you would prefer not to be included and we will contact you another way.

13. Sending data outside the EEA

Most of your data stays within the European Economic Area. Some transfers outside it do happen, in particular:

- where a horse passport, competition entry or export document requires it;
- where our IT, email, website or social media providers store or process data outside the EEA.

Where data goes outside the EEA we make sure one of the following applies:

- the country has been found by the European Commission to provide an adequate level of protection;
- the transfer is covered by Standard Contractual Clauses approved by the European Commission, with any additional safeguards needed; or
- a specific exception in Chapter V of the GDPR applies — for example the transfer is necessary to perform a contract with you, or you have explicitly consented after being told the risks.

You can ask our Data Protection Lead for details of the safeguards in place for any particular transfer.

14. How long we keep your data

We keep personal data only as long as we need it. These are our standard periods.

Record	Retention	Why
Adult client and lesson records	6 years after last contact	Contract and limitation period for claims
Records relating to a client who was under 18	Until the person's 21st birthday, or 6 years after last contact if later	The limitation period for a personal injury claim does not generally begin until a child reaches 18. Longer where our insurer requires it.
Camp, show and event registration and consent forms	Same as above, according to the participant's age	Insurance and defence of claims

Record	Retention	Why
Accident and incident records	10 years, or until the person's 21st birthday if a child, whichever is later	Health and safety and insurance
Livery records	6 years after the horse leaves	Contract, billing and claims
Safeguarding concern records and concerns log	[period set in the Safeguarding Policy retention schedule]	Extended limitation periods apply to claims arising from childhood abuse — take insurer and legal advice before setting this
Garda vetting disclosures	Duration of engagement, then [12 months]	Vetting Acts and safe recruitment
Training and qualification records	Duration of engagement plus 7 years	Evidence of competence and defence of claims
Employment and payroll records	7 years after employment ends	Tax law and employment claims
Working time records	3 years	Organisation of Working Time Act 1997
Unsuccessful job and volunteer applications	12 months	Defence of any equality claim
Complaints records	6 years after the complaint is closed	Defence of claims and pattern review
Accounting and tax records	6 years	Tax law
Marketing consents	Until withdrawn, then a record of the withdrawal	To show we had consent and to honour opt-outs
CCTV footage	[28 days], longer if needed for an incident	Security and investigation

At the end of the retention period, records are securely deleted or destroyed. Where we are required by law to keep data longer, we will.

15. Keeping your data secure

- Access to personal data is limited to those who need it for their role.
- Safeguarding records, vetting disclosures and personnel files are held separately from general client records, in a locked cabinet or an access-controlled system.
- Devices are password protected, kept up to date, and use two-factor authentication where available.
- Staff, contractors and volunteers receive data protection information at induction and are told what they may and may not do with client data.
- Access is removed the same day when someone leaves or changes role.
- We use written contracts with our processors requiring them to keep data secure and use it only on our instructions.

16. Data breaches

A personal data breach is any accidental or unlawful loss, alteration, disclosure of or access to personal data — for example a lost phone, a misdirected email or a break-in.

- Anyone who becomes aware of a possible breach must tell the Data Protection Lead immediately.
- We assess every breach and record it, whether or not it is reportable.
- Where a breach is likely to result in a risk to people's rights and freedoms, we notify the Data Protection Commission without undue delay and within 72 hours of becoming aware of it.

- Where a breach is likely to result in a high risk, we tell the people affected as soon as we can, in plain language, and explain what they should do.

17. Your rights

You have the right to:

- be told how we use your data — this policy;
- get a copy of the data we hold about you (a subject access request);
- have inaccurate or incomplete data corrected;
- have your data erased, where there is no good reason for us to keep it;
- restrict how we use your data while a question about it is resolved;
- receive data you gave us in a portable format, or have it sent to another organisation, where processing is based on consent or contract and is automated;
- object to processing based on legitimate interests, and to object to direct marketing at any time, which we will always act on;
- withdraw consent at any time, where consent is our basis; and
- not be subject to a decision based solely on automated processing. We do not make any such decisions.

To exercise any of these rights, contact our Data Protection Lead at **[email]**. We may need to verify your identity first.

We will respond within one month. If a request is complex or you have made several, we may extend that by up to two further months, and we will tell you within the first month if we need to and why. There is normally no charge.

Some rights do not apply in every case, and there are exceptions in the GDPR and the Data Protection Act 2018 — for example where we must keep data to meet a legal obligation, or where releasing it would identify someone else. If we refuse a request, in whole or in part, we will tell you why and tell you that you can complain to the Data Protection Commission.

18. Complaints

If you are unhappy with how we have handled your data, please contact our Data Protection Lead first so that we can try to put it right.

You also have the right to complain to the Data Protection Commission at any time:

- Data Protection Commission, 6 Pembroke Row, Dublin 2, D02 X963
- Portarlinton office: Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23
- Telephone: (01) 765 0100 or 1800 437 737 (helpdesk, Monday to Friday, 9.30am to 1pm)
- Website: www.dataprotection.ie — complaints must be made in writing through the online form

19. Changes to this policy

We review this policy at least every 24 months, and sooner if the law changes or if we change how we use personal data. The version number and date at the top show when it was last updated. The current version is always available on our website and on request at the yard office.