

**Data Protection
Privacy Policy**

**Hitchmough's Riding School
2020**

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 staff who serves as our Data Protection Lead. If you have any questions regarding our Privacy Policy, please email Tara O'Brien at hitchmoughsrs@gmail.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, your tutor or coach communicate with us by post, telephone, SMS, email, via our website, our social media pages or face-to-face
- from the information you provide to us when you make an application to work for us, or from third parties such as your previous or current employers so we can verify details about you
- as you interact with us in other ways; as a contractor, or in any other capacity

How we use personal information

We collect and use personal information about our clients, job applicants and volunteers for different purposes.

Contacting riders regarding lessons

Informing clients about Hitchmough's events and services

Providing appropriate horses and tuition

Provision of training courses to individuals

Provision of livery services to clients

Running events and camps

Dealing with complaints and appeals

Undertaking safeguarding activities including Garda Vetting checks and casework

Employee administration

Employee and volunteer recruitment

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
- Qualifications
- Name of your parent or guardian (if you are under 18)
- Name and contact details of any next of kin when you are riding with us
- In respect of job applicants, we may also collect:
 - your bank account details, tax and residency status
 - references from previous employers or educational institutions
 - contact details for your family members and next of kin
 - information concerning your health and medical conditions
 - information about your race and ethnicity
 - details of criminal convictions

Contacting riders regarding lessons

We use personal contact information to inform clients of lesson changes or other arrangements regarding the lessons. Our legal basis for using your personal information in this way is for the performance of a contract.

Informing clients about Hitchmough's 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.

Providing appropriate horses and tuition

We use rider's personal information e.g. weight, height, previous riding experience, to correctly allocate a horse and lesson to the client. Our legal basis for using your personal information in this way is for the performance of a contract.

Provision of training courses to individuals

If you sign up to one of our training courses, we will use the information that you provide to us to process your registration and provide the course to you. Our legal basis for using your personal information in this way is for the performance of a contract.

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Provision of livery services to clients

We use personal information to keep in regular contact with our livery clients in relation to the care of their horse. It may be necessary for us to share some of these details with a third party, e.g. a vet, farrier or equine dentist. Our legal basis for using your personal information in this way is for the performance of a contract.

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. 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. 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 to manage and resolve the complaint or appeal. This may include sharing relevant information with an affiliated organisation, such as The HSI 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 including Garda Vetting checks and casework

When necessary, we process relevant personal information about members, volunteers, coaches and employees for safeguarding purposes. This might include undertaking Garda Vetting checks and other checks to identify any criminal and other activity we need to be aware of and casework. It may be necessary to share some personal information with relevant authorities such as the Gardai, The Safeguarding Advisory Board and an appropriate member of the respective Member Body – such as The HSI, The Pony Club or an AIRC Riding Club (as appropriate to the safeguarding activity). Our legal basis for this processing is to meet our legal obligations.

Employee administration and professional development of staff

We will process personal information of our employees to fulfil our contract with them. This includes payroll processing and the provision of training. We are required by law to share some financial information with the Irish Revenue Service. We may also need to share some personal information with other organisations, for example solicitors, pension providers. Our legal basis for using your information for this is for the performance of a contract.

Employee and volunteer recruitment

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.

Cookies and aggregate information collected from www.hitchmoughs.ie

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.

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.

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 administer a training course
- To administer lessons
- To run camps and events

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.

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 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 Gardain and other competent authorities with investigations including criminal and safeguarding investigations.

Transferring personal data outside of the EEA

We may need to collect or send some personal information outside of the EEA, for example for horse passports. If we transfer personal information to countries or jurisdictions which do not have a similar standard of data protection law in place, we will only do so to fulfil our contract with you and we inform you in advance of the need to transfer the information. For information about international transfers of personal data, you can contact the Data Protection Lead, Tara O'Brien, at hitchmoughsrs@gmail.com.

Your rights

If you no longer wish to receive communications about products and services from us, please contact hitchmoughsrs@gmail.com. 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 Tara O'Brien at hitchmoughsrs@gmail.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 hitchmoughsrs@gmail.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 holding this information. Please contact us at hitchmoughsrs@gmail.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 hitchmoughsrs@gmail.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 hitchmoughsrs@gmail.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.

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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.

- We will keep client records for up to 5 years in order to enable staff to better assess returning clients
- We will keep records of events and camps for 2 years, in order to facilitate any insurance claim resulting from the activity.
- We will keep records of liveries for 5 years, in order to keep track of horses coming and going from the yard.
- We will keep employment records for the legally required period, as directed by the Information Commissioner's Office.

Changes to this policy

This Privacy Policy may change and where practical we will provide you with an updated Privacy Policy from time to time. However, we also recommend that you please visit our 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 Office of the Information Commissioner whose helpline number is: 01 639 5689.