

# **British Connemara Pony Society**

## **General Data Protection Regulation (GDPR)**

### **Privacy Notice**

#### **1. Introduction**

- 1.1. The British Connemara Pony Society (BCPS) is committed to protecting your personal information and respecting your privacy.
- 1.2. This Privacy Notice sets out the basis on which any personal data that we collect from or about you, or that you provide to us, will be processed by us.
- 1.3. For the purpose of the General Data Protection Regulation [the GDPR], the data controller is The British Connemara Pony Society.
- 1.4. We may update this Privacy Notice from time to time. Please check back regularly to see any updates or changes to this Notice.

#### **2. Data Protection Contact**

- 2.1. The contact details for the Secretary for any data protection queries are as follows:
  - 2.1.1. Email: [secretary@britishconnemaras.co.uk](mailto:secretary@britishconnemaras.co.uk)
  - 2.1.2. Tel: +44 0845 604 9690 (10:00am to 04:00pm)

#### **3. Data Protection Principles**

- 3.1. We will comply with data protection law. This says that the personal information we hold about you must be:
  - 3.1.1. Used lawfully, fairly and in a transparent way
  - 3.1.2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
  - 3.1.3. Relevant to the purposes we have told you about and limited only to those purposes
  - 3.1.4. Accurate and kept up to date
  - 3.1.5. Kept only as long as necessary for the purposes we have told you about
  - 3.1.6. Kept securely

#### **4. Particulars of processing**

- 4.1. We process personal data about Members, Judges, Ring Stewards and Competitors/Exhibitors at BCPS events. The categories of person about whom we process personal data are described in more detail in the Annex to this Privacy Notice.

1

#### **5. Your rights as a data subject**

- 5.1. The General Data Protection Regulation provides the following rights (subject to some exemptions):
  - 5.1.1. The right to request access to the personal data that we hold about you
  - 5.1.2. The right to request rectification of the personal data that we hold about you
  - 5.1.3. The right to request erasure of the personal data that we hold about you

- 5.1.4. The right to request restriction of processing about you
- 5.1.5. The right to object to processing; and
- 5.1.6. The right to data portability

If you wish to raise a complaint on how the BCPS has handled your personal data, you can contact the Secretary at the details above

If you are not satisfied with the response or believe we are processing your personal data not in accordance with the law, you can complain to the Information Commissioner's Office (ICO) full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

## **6. How we will use information about you**

6.1. We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- 6.1.1. Where we need to perform the contract you have entered into with us
- 6.1.2. Where we need to comply with a legal obligation
- 6.1.3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

6.2. We may also use your personal information in the following situations, which are likely to be rare:

- 6.2.1. Where we need to protect your interests (or someone else's interests)
- 6.2.2. Where it is needed in the public interest (or for official purposes)

6.3. We will generally process your personal data for contractual necessity in providing membership services and events. We may also use personal information for additional relevant and related purposes where you might reasonably expect us to do so, where the benefits of doing so are not outweighed by your own interests or fundamental rights or freedoms. This may include:

- 6.3.1. To maintain the records and other administrative purposes, including updating your details and preferences

2

- 6.3.2. To assist with queries, complaints and dispute resolution
- 6.3.3. For communications related to membership and invitations to participate in equine market research or equine health studies
- 6.3.4. To assist with upholding the Society's constitution and taking action in cases where there may be a breach of the Society's Rules

6.4. We will ask for your direct consent IF we intend to use your personal data for marketing purposes. Where the processing of personal data is based on your having given consent, you have the right, as a data subject, to withdraw that consent at any time. If you wish to invoke this right, please notify the Secretary using the contact details set out in Section 2 above.

6.5. You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact detail for which can be found at <https://ico.org.uk/global/contact-us/>

## **7. Recipients of Data**

7.1. We may use service providers to help us provide you with our services. Personal data may be transferred to such service provider, who act for, or on our behalf, for further processing in accordance with the purpose(s) for which the data was originally collected or may otherwise be lawfully processed.

7.2. Such third parties have contracted with us as data processors under the requirements in the GDPR. They are contractually bound to only use personal data for the agreed purpose(s).

Relevant persons working for these third parties will have access to your personal data under the terms of the data processor contract, but only to the extent necessary to perform their services for us.

7.3. These data processors agree to implement reasonable contractual and technical protections, to keep your data confidential, not to sell your personal data to third parties and to not disclose your personal data to third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy.

7.4. In appropriate circumstances we may disclose data to authorised bodies as required by law.

## **8. Visitors to the British Connemara Pony Society website – Cookie Policy**

8.1. About cookies:

8.1.1. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server

8.1.2. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed

8.1.3. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

8.2. We use cookies to monitor how people use the BCPS website and for the following reasons:

8.2.1. authentication - we use cookies to identify you when you visit our website and as you navigate our website.

8.2.2. status - we use cookies to help us to determine if you are logged into our website.

8.2.3. advertising - we do not use cookies to help us to display advertisements that will be relevant to you

8.2.4. analysis - we use Google cookies to help us to analyse the use and performance of our website and services. Cookies used for this purpose are specified by Google

8.3. Cookie information is held on your browser and you can amend your browser settings at any time. However, please be aware that blocking or deleting all cookies will affect the usability of the BCPS website.

## **9. Publicity and Intellectual Property**

9.1. Competitions may be recorded and videos, photographs and other recordings may be taken where an Entrant may be captured participating in the Competition. The Entrant agrees to the publication of such photographs, videos, recordings and/or likenesses of the Entrant (whether edited, adapted, modified or copied) and their use by the Organiser and those authorised by the Organiser, without prior notice or compensation, in any way which the Organiser may see fit now or in the future including but not limited to film, broadcast, radio, TV, publications, future events and publicity. The Entrant acknowledges that the Organiser has the full right to sell

4

and/or profit from the commercial use of such photographs, motion pictures, recordings and/or likenesses of the Entrant.

9.2. Any audio, visual or audio-visual recordings that are made by (or on behalf of) the Entrant of the Competition or any part of it are for personal use and cannot be published or used for any commercial purpose without the prior written consent of the Organiser.

9.3. The Entrant accepts and agrees that, if they win, the Organiser may announce their names, age and town of residence on the Organiser's website(s) and may use the same for publicity purposes which may include sharing and/or using the Entrant's details with the press and the Organiser's PR advisers.

9.4. The Entrant agrees and acknowledges that nothing in these Rules grants the Entrant any rights in or to any intellectual property owned or controlled by the Organiser.

## **10. Contact details**

10.1. Please contact the Secretary if you have any questions or concerns about personal data and privacy matters.

10.2. Our office and principal place of business is at:

24 Mount Pleasant Road  
Alton

Hampshire  
GU34 1NN  
United Kingdom

10.3. You can contact us:

- 10.3.1. by post, to the postal address given above
- 10.3.2. using our website contact form
- 10.3.3. by telephone, on +44 0845 604 9690 (10:00am to 04:00pm) or
- 10.3.4. by email to [secretary@britishconnemaras.co.uk](mailto:secretary@britishconnemaras.co.uk)

## ANNEX

This Annex sets out the British Connemara Pony Society’s processing of personal data relating to Members (including Board Members), Judges and Competitors/Exhibitors at BCPS and BCPS Affiliated events.

### What personal data do we process, why do we process it and what is the lawful basis?

**Members** [List of personal data processed e.g.:]

- Name
- Address
- Email address
- Telephone number/s
- Date of Birth

We process your personal data for the following purposes:

**[Purpose]**

**[Lawful basis]**

- |   |                              |
|---|------------------------------|
| <ul style="list-style-type: none"> <li>• Provision of membership services including administration and transactional communications relating to membership</li> </ul> | <p>Contractual Necessity</p> |
| <ul style="list-style-type: none"> <li>• Upholding the Society’s Rules and Code of Ethics</li> </ul>  | <p>Contractual Necessity</p> |
| <ul style="list-style-type: none"> <li>• Compliance with Horse of the Year Show Rules and</li> </ul>  |                              |

Regulations	Contractual Necessity
• Contacting you regarding newsletters, invitations and Information about Society events/meetings	Legitimate Interests
• Publication in the Society’s Newsletters or on the Society’s website	Consent
• Contacting you by email to provide related information information/marketing and communications (if any)	Consent

**Judges** [List of personal data processed e.g.:]

- Name
- Address
- Email address
- Telephone number/s
- Date of Birth

We process your personal data for the following purposes:

[Purpose]	[Lawful basis]
• Administration and transactional communications relating to judging appointments	Contractual Necessity
• Upholding the Society’s Rules and Code of Ethics	Contractual Necessity
• Compliance with Horse of the Year Show Rules and Regulations (including sharing relevant required information)	Contractual Necessity
• Publication in the Society’s Judges’ list and for appointments in the Show/Event Show Dates Lists, Schedules, Catalogues	Legitimate Interests

**Exhibitors/Competitors** [List of personal data processed e.g.:]

- Name
- Address
- Email address
- Telephone number/s
- Date of Birth
- Pony/Horse information

We process your personal data for the following purposes:

<b>[Purpose]</b>	<b>[Lawful basis]</b>
<ul style="list-style-type: none"> <li>• Administration and transactional communications for exhibitors/competitors entering BCPS events</li> </ul>	Contractual Necessity
<ul style="list-style-type: none"> <li>• Provision of services relating to BCPS events</li> </ul>	Contractual Necessity
<ul style="list-style-type: none"> <li>• Upholding the Society’s Rules and Code of Ethics</li> </ul>	Contractual Necessity
7	
<ul style="list-style-type: none"> <li>• Compliance with the Horse of the Year Show Rules and Regulations</li> </ul>	Contractual Necessity
<ul style="list-style-type: none"> <li>• Contacting you regarding future events</li> </ul>	Legitimate Interests
<ul style="list-style-type: none"> <li>• Publication of your name, address and pony/horse information in show/event catalogue (subject to the right to object)</li> </ul>	Legitimate Interests
<ul style="list-style-type: none"> <li>• Publication of event results on the BCPS website or any other relevant publications</li> </ul>	Legitimate Interests

We also process personal data for the Society’s legitimate interests as we have outlined in the main Privacy Notice. Please be assured that we will always take account of your personal data rights in doing so.

**Where do we obtain your personal data from?**

Most of the above personal data is received direct from you (the data subject). However, information may be received from third parties (e.g. Producer, Family Member, Friend, Owner).

**How long do we hold your personal data for?**

Personal data will be retained indefinitely as required by the Society for the legitimate interests of the sport for the purpose of historical records.

### **Are you obliged to provide us with your personal data?**

You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we will be unable to perform any contract you have entered into with the British Connemara Pony Society for the provision of membership services, judging appointments or event services.

### **Recipients of your personal data**

We disclose data to the following outsourced data processors in line with the main Privacy Policy, for the purposes of:

- Grassroots Systems Ltd – who are our software supplier and provide us with offsite data security facilities and backup member support. We have a General Data Protection Regulations (GDPR) compliant data processing agreement in place with them to ensure personal data is managed in compliance with GDPR.

8

- Affiliated Shows (Judges Only) for the purpose of selecting and inviting Judges
- To Associations/Societies for the purpose of checking entries and the results of affiliated classes at BCPS Shows/Events
- Orphans Press Ltd – for the printing of The Chronicle
- Moulton Printing Ltd – for printing the AGM booklet & Show Catalogue
- PayPal for the processing of debit/credit card payments
- Cato Computers Ltd for computer replacement, upgrade and repair.

### **Do we use your data for any automated decision-making?**

No personal data is processed for automated decision-making

**Any financial data arising from a transactional process will be held securely by the British Connemara Pony Society in accordance and compliance with all statutory and HMRC requirements.**

The objects of the **British Connemara Pony Society** are

- To preserve and improve the standard of the Connemara pony both pure and part bred by breeding and importing and to further its development in Great Britain and elsewhere;
- To provide or assist in the provision for the public benefit of facilities for recreation or other leisure time occupation through the use of ponies and horses but confined to facilities provided in the interests of social welfare within the meaning and so as to satisfy the requirements of the Charities Act 2011; and
- To prevent cruelty to horses and ponies.