



Warminster Saddle Club
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BHS Approved

DATA PROTECTION AND PRIVACY POLICY

Data protection

1. **Purpose and Background.** The Club holds information about riders, volunteers and other people involved with our activities. The Club has a responsibility to look after this information properly, and to comply with the Data Protection Act 2018¹. Good data protection practice is not just a matter of legal compliance and ticking the boxes. Data protection is about taking care of people and respecting their privacy. Poor practice or a serious breach could not only harm individuals but would also have a serious effect on the reputation of the Club.
2. **Scope.** This policy applies to information relating to identifiable individuals which is held by the Club.
3. **The legal basis for using people's data.** Everything the Club does with records about individuals – obtaining the information, storing it, using it, sharing it, even deleting it – will have an acceptable legal basis. There are four of these:
 - a. Consent from the individual (or someone authorised to consent on their behalf).
 - b. Where it is *necessary* in connection with a contract between the Club and the individual.
 - c. Where it is *necessary* because of a legal obligation – if the law says you must, you must.
 - d. Where it is *necessary* in an emergency, to protect an individual's 'vital interests'.
4. **Consent.** Where the Club bases its processing on consent it will be able to 'demonstrate' that it holds consent. This means having a record of who gave consent, when they gave it, how they gave it (e.g. on the website, on a form, verbally) and what they actually consented to. The consent form at Annex A is the standard form which every Club member is invited to complete and sign, thereby providing the record required.
5. **Data protection principles.** Data protection compliance is based largely on a set of principles. The six GDPR principles are:
 - a. **Transparency.** Whatever you do with people's information has to be fair and legal. This includes making sure they know what you are doing with the information about them.

¹ The [Data Protection Act 2018](#) is the UK's implementation of the General Data Protection Regulation (GDPR). GDPR is widely known about, which is why it is referred to generically in this policy (rather than the Data Protection Act 2018), but it is, unfortunately, widely misunderstood. It is possible to hold information legitimately just as it is possible to pass on information for justifiable purposes, as long as the individual consents to their information being handled in such a manner.

- b. **Purpose.** When you obtain information you must be clear why you are obtaining it, and must then use it only for the original purpose(s).
- c. **Data quality.** You must hold the right information for your purposes: it must be adequate, relevant and limited to what is necessary.
- d. **Record keeping.** Your information must be accurate and, where necessary, up to date.
- e. **Retention.** You must not hold information longer than necessary.
- f. **Security.** You must have appropriate security to prevent your information being lost, damaged, or getting into the wrong hands.

The Club's policy sections below reflect each of these principles in a bit more detail.

6. **Transparency and purposes (first and second principles).** The Club will make key information available to people at the time we collect information from them. This includes:

- a. The identity and contact details of our club and the person who is responsible for data protection.
- b. The purposes the Club intends to use the data for and the legal basis for this (see above).
- c. What the Club regards as its legitimate interests, if this is the basis for processing.
- d. Any specific recipients of the data (e.g. BHS) or categories of recipients.

Other information will be made available where relevant. This includes:

- e. The period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period.
- f. Details of the individual's rights, such as to request a copy of all the data held.
- g. The right to withdraw consent if that is the legal basis for processing (but not retrospectively).
- h. Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data.

In both cases, the Club will only tell people things they won't already know. When a rider joins the Club they know we will keep a record about them and their activities with us. We will therefore tell them anything that may not be entirely obvious to them.

7. Data quality, record keeping and retention (third, fourth and fifth principles).

The Club's activities will be more effective and appropriate with good quality records about the people the Club works for and with; GDPR insists on this. Specifically:

- a. The Club will ensure it has the information it needs, but no more (it must be adequate, relevant and limited to what is necessary) and it will be as accurate as the Club can make it and – where necessary – kept as up to date as possible. The Club will not keep it longer than necessary.
- b. The management committee will bear in mind the individual concerned has the right to see all the information recorded about them by the group.
- c. The Club will also have a clear policy on how long to keep information. It will draw up a retention schedule, taking each type of record held, specifying how long it is normally kept for, and the justification for this. The Club will set up a process for ensuring data is deleted or destroyed routinely at the appropriate time.

8. Security (sixth principle). The Club will take good care of the information it holds, whether on computer or on paper, and make sure it has have provided guidance and training to the management committee so they treat the information appropriately. In particular the Club will think about the risks when data is 'in transit' – either on portable devices or when it is being sent out. Examples include:

- a. If people are using their personal phone, laptop, camera or other device for the Club's purposes there will be clear expectations of how they should be secured.
- b. When sending information, particularly by e-mail, the Club will take steps to prevent confidential information being sent to the wrong person. For example, by using password-protected documents and sending the password in a separate e-mail.
- c. The Club will also take care not to disclose people's email addresses or other information inappropriately by carelessly copying in a large number of people or forwarding an e-mail that has been copied widely.
- d. Information on paper will not be left lying around, and will only be taken out of a secure location when this is really necessary.
- e. Where information is processed for us externally (for example by BHS) we will expect the external organisation to be able to give us satisfactory guarantees about the security measures they take.

9. Responsibilities. Responsibility for compliance with data protection lies with the organisation, not with any specific individual. The Club as a whole body will be responsible to keep up to date with any developments, to check that we are complying and have the evidence to prove it, to give advice to our committee and to handle any issues such as a data breach or a Subject Access Request. The Club *may* designate someone to be the lead person.

Privacy Policy

10. **What information does the Club collect about individuals?** The Club collects information about individuals when they complete relevant forms, including the membership form and the livery agreement.

11. **How will the Club use the information about individuals?** The Club will use the information about individuals to administer the Club's activities. Information about individuals may be passed to the British Horse Society, the national body, if it is relevant. The Club does not disclose any information about individuals to any company other than noted above, or if required to do so by law.

12. **Marketing.** The Club would like to send members newsletters and other information about its activities. If members have consented to receiving such marketing, they may opt out at a later date. Members have a right at any time to stop us from contacting them for marketing purposes.

13. **Access to your information and correction.** Individuals have the right to request a copy of the information the Club holds about them. The Club wants to make sure personal information is accurate and up to date. Individuals may ask the Club to correct or remove information they think is inaccurate.

14. **Retention of data.** Once an individual is no longer involved with the Club, it will securely retain their data for three years for adults and three years after a child reaches the age of 18.

Annex:

A. GDPR Consent Form.

**Annex A to
Data Protection and Privacy Policy**

GENERAL DATA PROTECTION REGULATION CONSENT FORM

1. **General.** The Club's data protection and privacy policy describes how the Club will comply with the requirements of the Data Protection Act 2018, which is the UK's implementation of the General Data Protection Regulation (GDPR). This form, once completed, is the record that the individual who signs the form consents to their personal information being held by the Club. Such a record is one of the requirements of GDPR. The Vice Chair is the Club's lead for data protection.

2. **Purpose.** The specific purpose for which the Club holds information and/or data on any of its members is primarily to maintain vital communications with them for anything related to the welfare of horse(s), constitutional, regulatory, or rule-based changes to the operations of the club, its activities, elections, events, functions, or any other communications deemed to be in the interest of the Club's members, with specific relevance to the Club.

3. **Consent.** The Club requires consent from all members to hold their personal data. You are therefore requested to complete this form and return it to the club.

Permission to use photos taken during riding lessons: YES / NO (delete as appropriate)

Title: Mr / Mrs / Miss / Rank _____ (delete/insert as appropriate)

Surname: _____ Forename(s): _____

Address: _____

_____ Post code: _____

24 hr contact number(s): _____

Email address: _____

This information will be held on the Warminster Saddle Club Database. I understand the details on this form will be used for club purposes only.

Signed: _____

Print name: _____ Date: _____