

**Data Protection**

**Privacy Policy**

**Barleyfields Equestrian Careers LLP**

**&**

**Barleyfields Equestrian Centre Ltd**

## 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 [info@barleyfields.com](mailto:info@barleyfields.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 or via our website
- 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
- when you complete a rider registration form
- when you enter in a competition and complete an entry form

## How we use personal information

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

We only collect personal information that we genuinely need.

This may include:

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This may include:

- Contact details such as name address, email address and phone numbers
- Date of birth and gender
- Any Special Educational Needs (SEN) requirements for exams including relevant medical records
- Dietary requirements where this is required for catering
- Qualifications
- Name of your parent or guardian (if you are under 18)
- Name and contact details of any next of kin where you are attending an event and are riding/carriage driving)
- In respect of job applicants, we may also collect:
  - references from previous employers or educational institutions
  - contact details for your family members and next of kin
  - information concerning your health and medical conditions
  - details of criminal convictions

### 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.

### 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. Our legal basis for using your personal information in this way is for the performance of a contract.

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.

### Fulfilling entries from our online entries

If you choose to enter from our online entries we will use the information you provide to fulfil your purchase. Our legal basis for using your personal information for this purpose is for the performance of a contract.

We use Sagepay to process payments

We may occasionally also use your contact information to email you in connection with your entry. You can choose to unsubscribe from receiving these communications at any time.

### 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 other relevant organisations.

### Undertaking safeguarding activities including DBS checks and casework

When necessary, we process relevant personal information about our staff for safeguarding purposes. This might include undertaking DBS 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. 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 HMRC. 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.

## Our legal basis for processing personal information

Our legal basis for the purposes that we process personal is for the performance off 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 issue or administer a membership
- To administer a training course and award a qualification

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.

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

### Recording safety incidents and accidents

We record and retain relevant personal information about accidents, incidents and near misses that are reported to us. Our legal basis for this processing is to fulfil our legitimate interest and organisational objective to ensure every horse and rider is as safe as possible. We analyse the information provided to us and use the statistics to lobby those in power to make the changes that are required to ensure riding is safer for all

### Employee administration and professional development of staff

We will process 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 HMRC. 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 enquire, 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 legitimate interest.

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

## Your rights

You have the right to:

- Request a copy of the information we hold about you. Requests should be addressed to [info@barleyfields.com](mailto:info@barleyfields.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 [info@barleyfields.com](mailto:info@barleyfields.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 [info@barleyfields.com](mailto:info@barleyfields.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 [info@barleyfields.com](mailto:info@barleyfields.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 [info@barleyfields.com](mailto:info@barleyfields.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.

## 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, audit or insurance purposes.

- We will keep records of events and camps for 3 years, in order to facilitate any insurance claim resulting from the activity.
- We will keep Riding Club Membership records indefinitely, in order to administer and manage on-going entitlement to membership and event entry.
- We will keep complaints records indefinitely, in order to administer and manage on going complaints and where appropriate provide a baseline for tracking complaints against centres/individuals for future reference to make informed decisions around accreditation/qualification/safeguarding/welfare issues, as is relevant.
- We will keep DBS records for 6 months, in order to comply with our legal obligations
- We will keep Safeguarding records indefinitely, in order to comply with legal obligations

- We will keep Safety/accident records indefinitely, in order to administer and manage the ongoing activities/work we are engaged in. We may also retain the date in order to provide statistical data for analysing our activities/work and the impact it has on our organisational and charitable objectives.
- We will keep staff records indefinitely, in order to comply with pension and tax obligations.
- We will keep expenses records for 7 years, in order to comply with our legal obligation.

## Changes to this policy

This Privacy Policy may change from time to time. Where practical we will provide you with an updated Privacy Policy from time to time. However, we also recommend that you please visit this 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 Information Commissioner's Office whose helpline number is: **0303 123 1113**.

Barleyfields Equestrian Centre is committed to protecting your privacy. We will only use the information we collect concerning you lawfully and in accordance with the Data Protection Act 1998. We collect, maintain and use information as necessary, so we can provide targeted products and services to meet user needs. You have a right at any time to stop us from contacting you for marketing purposes and we will act accordingly and in a timely manner.

The personal information we hold will be held securely in accordance with our internal security policy and the law. If we intend to transfer your information outside of Barleyfields Equestrian Centre, we will always obtain your consent first.