



Data Protection Privacy Policy

Country Farm Stud 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, volunteers, students and clients 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 karenraine@btinternet.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 or your college tutor 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 study with us, from third parties such as your previous or current employers so we can verify details about you
- as a client when you communicate with us by post, telephone, SMS, email or via our website or fill in a livery contract or nomination form
- 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, volunteers and students for different purposes.

[List purposes here. This should be the list of purposes from your Personal Information Asset Register. Some examples are listed below. Delete as necessary and add your own]

Provision of services to clients

Informing non-clients about Country Farm Stud Ltd. events and services

Provision of training courses to individuals

Provision of qualifications to individuals

Provision of riding lessons or clinics to individuals

Dealing with complaints and appeals

Undertaking safeguarding activities including DBS checks and casework

Processing expenses

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
- Credit card details and any purchases you have made
- Date of birth and gender
- Any Special Educational Needs (SEN) requirements for qualifications 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
- Nationality
- 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, ethnicity and sexual orientation
- details of criminal convictions

Membership applications, administration and renewals

We will use the information that you provide to us to provide our services . We will email and post you information about events, courses, our services and other items of interest, as part of your membership. You can opt out or unsubscribe from receiving this information if you wish. Our legal basis for using your personal information in this way is for the performance of a contract.

Informing non-clients about Country Farm Stud Ltd. 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.

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.

Provision of assessments to individuals

If you apply to undertake a qualification, we will use your information provided to us to process your application and enable you to undertake the course. This will include sharing some of your information with the governing body and training provider . It may also include collecting and sharing medical information with your training provider if you choose to provide that to us and if it is necessary. Our legal basis for using your personal information in this way is for the performance of a contract.

Running courses and clinics

If you register for one of our courses or clinics, we will use your information provided to us to process your registration and enable you to attend the event or camp. This may include sharing some of your information with our staff that assist with the course. 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 courses.

Dealing with complaints and appeals

If a complaint 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 our veterinary surgeon, farrier, physio or saddle fitter an affiliated organisation, such as The BEF or a 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 DBS checks and casework

When necessary, we process relevant personal information about members, volunteers, and employees 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 such as the police and The Safeguarding Advisory Board Our legal basis for this processing is to meet our legal obligations.

Processing expenses

We will use your personal information including your bank account details to process expense claims. Our legal basis for using your information for this is for the performance of a contract.

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 accountant, 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.

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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.

[Amend the following section as necessary for your organisation]

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 provide services you have requested
- To administer a training course and award a qualification
- To provide a work experience placement
- In line with employment law

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 or is injured whilst on our premises

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 Training providers, referees, and awarding bodies.

We will also share your information with Veterinary Surgeons, Farriers, Physios, Saddle Fitter, Defra, Breed Societies and Transport Companies if necessary for the ongoing care of your horse and to fulfil our contract with you.

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

Transferring personal data outside of the EEA

[Amend the following section as necessary for your organisation. If your organisation does not transfer data outside of the EEA, please state this and delete the remaining text]

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 at [insert your data protection lead's email address]

Your rights

If you no longer wish to receive communications about products and services from us, please contact karenraine@btinternet.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 [enter the email address of your data protection lead]. 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 [insert an email address that can be used for contact preference updates]
- 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 [enter the email address of your data protection lead].
- 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 [enter the email address of your data protection lead].
- 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 [enter the email address of your data protection lead].

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 or audit purposes.

[Tailor this section to your organisation. We have left one example here to get you started. Look at all the rows in your Personal Information Asset Register and create a bullet point here to match]

- Brood Mare and Stallion owners indefinitely to be able to provide breeding and pedigree records as required by Breed Societies and Defra

- Other clients- core data kept indefinitely, non-core data of past liveryes 3 years in order to facilitate insurance claims
- Students undertaking qualifications indefinitely in order to be able to verify qualification completion
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- We will keep records of training courses or clinics for 2 years, in order to facilitate any insurance claim resulting from the activity.

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**.