

## Data Protection & Data Security Policy

### **1. Statement & Purpose of Policy**

- 1.1 The committee of Long Eaton Riding Club are committed to ensuring that all personal information held and handled by the club will be processed according to legally compliant standards of data protection and data security.
- 1.2 The purpose of this policy is to help us achieve our data protection and data security aims by;
  - (i) notifying our members and all other persons who's information that we may hold for whatever reason, of the types of personal information that we may hold about them and what we do with that information,
  - (ii) ensuring that all members and all other persons who's information that we may hold for whatever reason understand our rules and the legal requirements for handling personal information relating to members and others, and;
  - (iii) clarifying the responsibilities and duties of members of the committee and others in respect of data protection and data security.
- 1.3 This is a statement of policy only and should be read in accordance with our constitution of which it forms a part. We may amend this policy at any time, to our absolute discretion. Any such amendments will be published on our website at the earliest opportunity after being ratified by the committee.

### **2. Responsibility for Data Protection & Security**

- 2.1 Maintaining appropriate standards of data protection and data security is a collective task shared between everyone involved with the running of the club. This policy and the rules contained in it apply to all persons concerned with the running of the club, including (but not limited to) committee members, members actively participating in the running of the club, volunteers and any staff who may be employed or provide voluntary assistance to the club, on a temporary or permanent basis at any point.
- 2.2 The committee have overall responsibility for ensuring that all personal information is handled in compliance with the law and have appointed Sarah Summerfield as the Data Protection Officer, with day to day responsibility for data processing and data security.
- 2.3 All relevant persons (as per section 2.1 above) have personal responsibility to ensure compliance with this policy, to handle all personal information consistently with the principals set out here and to ensure that measures are taken to protect the security of data. Committee members have a special responsibility for leading by example and monitoring and enforcing compliance.
- 2.4 Any breach of this policy will be taken seriously and may result in appropriate action being taken by the committee, in accordance with the constitution, or otherwise or legal obligations.

### **3. What is Covered by this Policy**

3.1 This policy covers personal information;

- (i) which relates to any living individual who can be identified either from that information in isolation or by reading it together with other information we possess,
- (ii) that is stored by any means whatsoever, whether that be electronically, on paper, or otherwise,
- (iii) in the form of both statements of fact and of opinion,
- (iv) which relates to members (present, past or future) or to any other individual whose personal information we handle or control for any reason,
- (v) which we obtain, hold or store, organise, disclose or transfer, amend, retrieve, use, handle, process, transport or destroy.

### **4. Member Information**

4.1 We collect personal information about all members which;

- (i) you provide or we gather before or during your membership with us,
- (ii) is provided by third parties,
- (iii) is provided by HMRC or any other government or regulatory department or contractor,
- (iv) is in the public domain.

4.2 The types of personal information that we may collect, store and use about you includes records relating to you;

- (i) Your home address, contact details and those of your next of kin,
- (ii) medical information you disclose to us or otherwise that may come into our possession in the course of your membership,
- (iii) any accidents you may suffer whilst participating in club activities, including first aid treatment that you may receive,
- (iv) contact details for your General Practitioner,
- (v) details of your horse or any horses(s) you may own, loan or otherwise use to participate in club activities with,
- (vi) details of membership fees paid and due,
- (vii) any other information that you provide, whether it is directly requested by us, provided to us on request or that otherwise comes into our possession.

4.3 We will use information to carry out our existence and operations as a club, in any way that may be of benefit to the club, our members or the committee. This may include, however is not limited to;

- (i) maintaining membership records,
- (ii) credit control relating to membership fees,
- (iii) insurance compliance,
- (iv) compliance with Health and Safety legislation or regulations,
- (v) to enter and participate in competitions,
- (vi) to administer first aid,
- (vii) to comply with any legal or regulatory requirements whatsoever.

- 4.4 We confirm that for the purposes of the Data Protection Act 1998, the club is a Data Controller of the personal information in connection with your membership. This means that we determine the purposes for which, and the manner in which, your personal information is processed.
- 4.5 If you consider that any information held about you is inaccurate then you should tell the Data Protection Officer and, if we agree that the information is inaccurate then we undertake to correct it. If we do not agree with the correction then we will note your comments on file, and provide a full written explanation of the reasons for our disagreement, citing further avenues of redress that might properly be available to you, should you wish to dispute the matter further.
- 4.6 We will take reasonable steps to ensure that your personal information is kept secure, as described later in this policy and in general, we will not disclose your personal information to others outside of the company, except when in accordance with, or required by, the law or any other regulatory requirements by which we might be bound. We may need to disclose personal information about members;
- (i) for the administration of your membership and associated benefits,
  - (ii) to meet the requirements of any competitions that we may participate in,
  - (iii) to comply with insurance requirements,
  - (ii) to comply with our legal obligations,
  - (iv) to comply with RSPCA or British Horse Society requirements or regulations,
  - (iv) to other parties which provide products or services to the club.
- 4.7 By providing your personal information to us, you consent to the use of your personal information, in accordance with this policy.

## **5. Data Protection Principals**

- 5.1 Any person whose work, volunteering or participation in club activities involves using personal data relating to members or others must comply with this policy and with the eight legal data protection principles which require that personal information is;
- (i) Processed fairly and lawfully,
  - (ii) Processed for limited purposes and in an appropriate way,
  - (iii) Adequate, relevant and not excessive for the purpose,
  - (iv) Accurate,
  - (v) Not kept longer than necessary for the purpose,
  - (vi) Processed in line with the subject's rights,
  - (vii) Secure,
  - (viii) Not transferred to people or organisations situated in countries without adequate protection.
- 5.2 Some personal information needs even more careful handling. This includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life or about criminal offences. Strict conditions apply to processing this sensitive personal information and the subject must normally have given specific and express consent to each way in which the information is used.

## **6. Data Security**

- 6.1 We must all protect personal information in our possession from being accessed, lost, deleted or damaged unlawfully or without proper authorisation through the use of data security measures.
- 6.2 Maintaining data security means making sure that;
- (i) only people who are authorised to use the information can access it,
  - (ii) information is accurate and suitable for the purpose for which it is processed, and;
  - (iii) authorised persons can access information if they need it for authorised purposes. Personal information therefore should not be stored on individual computers but instead on a central system so far as is practicable and possible.
- 6.3 By law, we must use procedures and technology to secure personal information throughout the period that we hold or control it, from obtaining through to destroying the information.
- 6.4 Personal information must not be transferred to any person to process (eg. while performing services for us, on our behalf), unless that person has either agreed to comply with our data security procedures or we are satisfied that other adequate measures exist.
- 6.5 Security procedures include;
- (i) Physically securing information,
  - (ii) Controlling access to premises,
  - (iii) Telephone precautions,
  - (iv) Methods of disposal.

## **7. Subject Access Requests**

- 7.1 By law, any subject (including members) may make a formal request for information that we hold about them, provided that certain conditions are met. The request must be made in writing. A fee is payable by the data subject for the provision of this information. In some circumstances it may not be possible to release all of the information about the subject to them, for example if it contains personal data about another person.
- 7.2 Any committee member (or other person concerned with the running or administration of the club at any given time) who receives a written request should forward it to the Data Protection Officer immediately.

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**For and on behalf of;  
Long Eaton Riding Club**