

GDPR Policy

1. Introduction

- 1.1 This Policy sets out the obligations of Long Eaton Riding Club (hereinafter referred to as “The Club”) regarding data protection and the rights of individuals that the Company engages with (hereinafter referred to as the “Data Subjects”) in respect of personal data under the General Data Protection Regulation (hereinafter referred to as “Regulation”). A ‘Data Subject’ may be an individual or an individual acting on behalf of a corporate body (i.e. a company director).
- 1.2 The Regulation defines “personal data” as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- 1.3 This Policy sets out the procedures that are to be followed when dealing with personal data. The procedures and principles set out herein must be followed at all times by The Club, its employees, agents, contractors, or other parties working on behalf of The Club.

2. The Data Protection Principles

- 2.1 This Policy aims to ensure compliance with the Regulation. The Regulation sets out the following principles with which any party handling personal data must comply. All personal data must be:
 - a) processed lawfully, fairly, and in a transparent manner in relation to the data subject;
 - b) collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
 - c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
 - d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
 - e) kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject;
 - f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. Lawful, Fair and Transparent Data Processing

3.1 The Regulations seek to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The Regulations state that processing of personal data shall be lawful if at least one of the following applies:

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

4. Processed for Specified, Explicit and Legitimate Purposes

- 4.1 The Club collects and processes the personal data set out in Part 20 of this Policy. This may include personal data received directly from Data Subjects (for example, contact details used when a data subject communicates with us).
- 4.2 The Club only processes personal data for the specific purposes set out in Part 20 of this Policy (or for other purposes expressly permitted by the Regulation). The purposes for which we process personal data will be informed to Data Subjects at the time that their personal data is collected, where it is collected directly from them, or as soon as possible (not more than one calendar month) after collection where it is obtained from a third party.

5. Adequate, Relevant and Limited Data Processing

- 5.1 The Club will only collect and process personal data for and to the extent necessary for the specific purpose(s) informed to Data Subjects as under Part 4, above.

6. Accuracy of Data and Keeping Data Up To Date

- 6.1 The Club shall ensure that all personal data collected and processed is kept accurate and up-to-date, so far as reasonably practicable. Where any inaccurate or out-of-date data is found, all steps will be taken without delay to amend or erase that data, so far as reasonably practicable.

7. Secure Processing

- 7.1 The Club shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss,

destruction or damage. Further details of the data protection and organisational measures which shall be taken are provided in Part 22 of this Policy.

8. Accountability

- 8.1 Should you have any queries in respect of data protection or GDPR, please contact us on sarah.summerfield@amco.eu.com, marking your email "FAO: The Data Controller".
- 8.2 The Club shall keep written internal records of all personal data collection, holding, and processing and its Committee and Data Controller shall oversee, update and review such relevant policies and written internal records on an ongoing basis.
- 8.3 The Club shall carry out Privacy Impact Assessments ("PIA") in accordance with the Regulation from time to time. Any PIA shall be overseen by the Committee or Data Controller.

9. The Rights of Data Subjects

- 9.1 The Regulation sets out the following rights applicable to Data Subjects:
 - a) The right to be informed;
 - b) The right of access;
 - c) The right to rectification;
 - d) The right to erasure (also known as the 'right to be forgotten');
 - e) The right to restrict processing;
 - f) The right to data portability;
 - g) The right to object;
 - h) Rights with respect to automated decision-making and profiling.

10. Data Subject Access

- 10.1 A data subject may make a Subject Access Request ("SAR") at any time to find out more about the personal data which The Club holds about them. The Club is normally required to respond to SARs within one month of receipt (this can be extended by up to two months in the case of complex and/or numerous requests, and in such cases the data subject shall be informed of the need for the extension).
- 10.2 All subject access requests received must be forwarded to the Data Controller.
- 10.3 The Club does not charge a fee for the handling of normal SARs. The Club reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

11. Rectification of Personal Data

- 11.1 If a data subject informs The Club that personal data held by The Club is inaccurate or incomplete, requesting that it be rectified, the personal data in question shall be rectified, and the data subject informed of that rectification, within one month of receipt the data subject's notice (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).

12. Erasure of Data

12.1 Data Subjects may request that The Club erases the personal data it holds about them in the following circumstances:

- a) It is no longer necessary for The Club to hold that personal data with respect to the purpose for which it was originally collected or processed;
- b) The data subject wishes to withdraw their consent to The Club holding and processing their personal data;
- c) The data subject objects to The Club holding and processing their personal data (and there is no overriding legitimate interest to allow The Club to continue doing so) (see Part 17 of this Policy for further details concerning Data Subjects' rights to object);
- d) The personal data has been processed unlawfully;
- e) The personal data needs to be erased in order for The Club to comply with a particular legal obligation.

12.2 Unless The Club has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).

13. Restriction of Personal Data Processing

13.1 Data Subjects may request that The Club ceases processing the personal data it holds about them. If a data subject makes such a request, The Club shall retain only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place.

14. Objections to Personal Data Processing

- 14.1 Data Subjects have the right to object to The Club processing their personal data based on legitimate interests (including profiling), direct marketing (including profiling).
- 14.2 Where a data subject objects to The Club processing their personal data based on its legitimate interests, The Club shall cease such processing forthwith, unless it can be demonstrated The Club's legitimate grounds for such processing override the data subject's interests, rights and freedoms; or the processing is necessary for the conduct of legal claims.
- 14.3 Where a data subject objects to The Club processing their personal data for direct marketing purposes, The Club shall cease such processing forthwith.
- 14.4 Where a data subject objects to The Club processing their personal data for scientific and/or historical research and statistics purposes, the data subject must, under the Regulation, 'demonstrate grounds relating to his or her particular situation'. The Club is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.

15. Personal Data

15.1 The following personal data may be collected, held, and processed by The Club:

- a) Names;
- b) Telephone and/or mobile numbers;
- c) Addresses;
- d) Email addresses; and
- e) Any such other similar personal data, in each case, as above for the legitimate purpose of The Club fulfilling its business as, primarily, a recruitment company.

16. Data Protection Measures

16.1 The Club shall ensure that all its employees, agents, contractors, or other parties working on its behalf comply with the following when working with personal data:

- a) All emails containing personal data must be encrypted;
- b) Where any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. Hardcopies should be shredded, and electronic copies should be deleted securely.
- c) Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
- d) Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
- e) All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet or similar;
- f) Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, sub-contractors or other parties at any time;
- g) If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
- h) All personal data stored electronically should be backed up.
- i) All electronic copies of personal data should be stored securely using passwords;
- j) All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised.

17. Organisational Measures

17.1 The Club shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- a) All committee members, volunteers, employees, agents, contractors, or other parties working on behalf of The Club shall be made fully aware of both their individual responsibilities and The Club's responsibilities under the Regulation and under this Policy, and shall be provided with a copy of this Policy;
- b) Only committee members, volunteers, employees, agents, sub-contractors, or other parties working on behalf of The Club that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by The Club;

- c) All employees, agents, contractors, or other parties working on behalf of The Club handling personal data will be appropriately trained to do so;
- d) All committee members, volunteers, employees, agents, contractors, or other parties working on behalf of The Club handling personal data will be appropriately supervised;
- e) The performance of those committee members, volunteers, employees, agents, contractors, or other parties working on behalf of The Club handling personal data shall be regularly evaluated and reviewed;
- f) All committee members, volunteers, employees, agents, contractors, or other parties working on behalf of The Club handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy by contract;

18. Transferring Personal Data to a Country Outside of the EEA

- 18.1 The Club may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA. The transfer will also take place if it is in accordance with European Commission rules and/or the transfer is made with the informed consent of the relevant data subject(s) and/or it is necessary for the performance of a contract between the data subject and The Club and/or for public policy reasons and/or for the conduct of legal claims and/or to protect the vital interests of the data subject where the data subject is physically or legally unable to consent and/or where there is a legitimate or public interest in doing so.

19. Data Breach Notification

- 19.1 All personal data breaches must be reported immediately to The Club's Data Controller.
- 19.2 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of Data Subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Controller must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- 19.3 In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 24.2) to the rights and freedoms of Data Subjects, the data protection officer must ensure that all affected Data Subjects are informed of the breach directly and without undue delay.
- 19.4 Data breach notifications shall include the following information:
- a) The categories and approximate number of Data Subjects concerned;
 - b) The categories and approximate number of personal data records concerned;
 - c) The name and contact details of the The Club's data protection officer (or other contact point where more information can be obtained);
 - d) The likely consequences of the breach;
 - e) Details of the measures taken, or proposed to be taken, by The Club to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

20. Implementation of Policy

- 20.1 This Policy shall be deemed effective as of 1st May 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.