

LANCING EQUESTRIAN PRIVACY NOTICE

WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is intended to provide information about how Lancing Equestrian Ltd ("Lancing Equestrian") will use (or "process") personal data about individuals including its current, past and prospective clients (e.g. Lancing College pupils, liveries, regular and occasional riders, pony club members, all referred to as "clients") and their parents, carers or guardians (referred to as "parents").

This information is provided because of the General Data Protection Regulation (GDPR) gives individuals rights to understand how their data is used. This Privacy Notice applies alongside any other information Lancing Equestrian may provide about a particular use of personal data, for example when collecting data via an online or paper form. It also applies in addition to other relevant terms and conditions and policies, including:

- any contract between Lancing Equestrian and its staff, clients or parents
- Lancing Equestrian's Data Protection and Data Handling Policy
- Lancing Equestrian's CCTV Policy
- Lancing Equestrian's Taking, Storing and Using Images of Children Policy
- Lancing Equestrian's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded.

Lancing Equestrian Ltd is committed fully to compliance with the requirements of the GDPR. The GDPR sets out principles which should be followed by those who collect, store and process data and it gives rights to those whose data is being processed. visit <https://ico.org.uk/for-the-public/> for an explanation of these rights.

Anyone who works for, or acts on behalf of, Lancing Equestrian (including staff, volunteers and service providers) should also be aware of and comply with this Privacy Notice.

RESPONSIBILITY FOR DATA PROTECTION

Jan Tupper, Director of Lancing Equestrian will deal with any requests and enquiries concerning the use of your personal data and will endeavour to ensure that all personal data is processed in compliance with this Privacy Notice and the GDPR. Contact should be made by telephone on 01903 763815, by email on jan@lancingequestrian.co.uk or by post at Lancing Equestrian, Hoe Court Farm, Lancing, West Sussex, BN15 0QX.

WHY LANCING EQUESTRIAN NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to clients and parents, Lancing Equestrian needs to process a range of personal data about individuals (including current, past and prospective clients or parents) as part of its daily operation. This includes the processing of data in order to meet a contractual obligation e.g. in the delivery of safe and effective horse riding tuition/hacking and horse care services, which may include monitoring clients' progress and educational needs.

Other uses of personal data will be made in accordance with Lancing Equestrian's legitimate interests provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

Lancing Equestrian expects that the following uses will fall within that category of legitimate interests:

- For the purposes of management planning
- To enable relevant authorities to monitor Lancing Equestrian's performance and to intervene or assist with incidents as appropriate
- To enable clients to take part in national or other assessments, and to publish the results of these or other achievements of clients of Lancing Equestrian
- To safeguard clients' welfare and provide appropriate pastoral care
- To monitor (as appropriate) use of Lancing Equestrian's IT and communications systems in accordance with Lancing Equestrian's IT procedures
- For security purposes, including CCTV in accordance with Lancing Equestrian's CCTV policy
- To carry out or co-operate with any internal or external complaints, disciplinary or investigation process
- Where otherwise reasonably necessary for Lancing Equestrian's purposes, including to obtain appropriate professional advice and insurance for Lancing Equestrian.

In addition, Lancing Equestrian will on occasion need to process special category personal data (concerning health) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- To safeguard clients' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and co-operation with police or social services, for insurance purposes or to caterers or organisers of Lancing Equestrian events/trips who need to be made aware of dietary or medical needs
- As part of any internal or external complaints, disciplinary or investigation process that involves such data, for example if there are health or safeguarding elements
- For legal and regulatory purposes (for example child protection, health and safety) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY LANCING EQUESTRIAN

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details
- date of birth
- past and present progress records
- where appropriate, information about individuals' health and welfare, height, weight, previous horse riding experience, medical information relevant to the activity you are undertaking and contact details for use in an emergency
- correspondence with and concerning clients and parents, past and present
- images of riders (and occasionally other individuals) engaging in Lancing Equestrian activities, and images captured by the CCTV system (in accordance with Lancing Equestrian's CCTV Policy and on Taking, Storing and Using Images of Children Policy).

HOW LANCING EQUESTRIAN COLLECTS DATA

Generally, Lancing Equestrian receives personal data from the individual directly (including, in the case of children, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as telephone, email or written assessments). Such personal information may be requested and collected in order to enable us to provide you with safe, enjoyable and effective riding tuition, hacking and/or horse care services.

However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from publicly available resources.

Lancing Equestrian Ltd will automatically receive and record information on our server logs when you browse the Lancing Equestrian website, including your IP address, cookie information, and the web pages you request. We use this information to customise the content you see, fulfil your requests and for technical web site administration.

Personal data may also be used and shared to provide appropriate pastoral care, to support teaching and learning and to monitor and report on progress e.g. GCSE assessments, DofE reports will be shared with schools/college as required and requested.

WHO HAS ACCESS TO PERSONAL DATA AND WHO LANCING EQUESTRIAN SHARES IT WITH

Occasionally, Lancing Equestrian will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. lawyers, insurers)
- government authorities (e.g. HMRC, DfE, police or the local authority)

- medical support (e.g. in the event of an accident and when it is in the individual's vital interests)
- service providers who support the activities of Lancing Equestrian e.g. British Horse Society, The Pony Club UK
- appropriate regulatory bodies e.g. the Information Commissioner.

For the most part, personal data collected by Lancing Equestrian will remain within Lancing Equestrian and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records which are held and accessed only by Lancing Equestrian employees and appropriate medical staff, or otherwise in accordance with express consent and
- pastoral or safeguarding files.

Clients and parents are reminded that Lancing Equestrian is under duties imposed by law and statutory guidance to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the Local Authority Designated Officer (LADO) or police. For further information about this, please view Lancing Equestrian's Safeguarding Policy. Lancing Equestrian will also record low level safeguarding concerns in order to monitor these in case they add up to a serious concern.

Finally, in accordance with the GDPR, some of Lancing Equestrian's processing activity is carried out on its behalf by third parties, such as IT system providers, photographers, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with Lancing Equestrian's specific directions.

HOW LONG WE KEEP PERSONAL DATA

Lancing Equestrian will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Some data retention periods are set by the law. Typically, for clients, personal data will be held for a period of no longer than three years after you cease to be an active client.

If you have any specific queries about how our retention policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact Jan Tupper (contact details above). However, please bear in mind that Lancing Equestrian will often have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes, e.g. accident records. Even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record"). If you would like further information on Lancing Equestrian's "Retention of Records Procedure" please contact Jan Tupper.

KEEPING IN TOUCH AND SUPPORTING LANCING EQUESTRIAN

Lancing Equestrian will use the contact details of clients and parents to keep them updated about the activities of Lancing Equestrian and events of interest, including by sending updates, publications and newsletters, by email and by post but only when consent has been received by completion of the relevant section of the Rider Registration Form. This may include the occasional promotion of fundraising activities or events/charities which we are supporting. This consent can be withdrawn in writing at any time.

DATA ACCURACY AND SECURITY INCLUDING SUBJECT ACCESS REQUESTS

Lancing Equestrian will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. We do not rent, sell or share personal information about you with other people or non-affiliated companies, except to provide products or services you've requested, when we have your permission. We will use reasonable efforts to ensure that your personal data is secure and is not disclosed unless required by law or other regulations.

If you wish to see a copy of the personal information which Lancing Equestrian holds about you, please submit a request to Jan Tupper (contact details above). If you believe that any information held about you is incorrect, incomplete or out of date, or you wish us to delete the information held by us, then you should submit a request to Jan Tupper (contact details above). We will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

Lancing Equestrian will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to business systems. All staff and volunteers will be made aware of this policy and their duties under GDPR and receive relevant training.

QUERIES AND COMPLAINTS

Any comments or queries on this Privacy Notice should be directed to Jan Tupper (contact details above). If an individual believes that Lancing Equestrian has not complied with this Privacy Notice, they should contact Jan Tupper in the first instance. Complaints will be dealt with in accordance with the Lancing Equestrian Complaints Handling Policy.

CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time. We will notify you about significant changes in the way we treat personal information by making this notice available on our website. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.