Look for all the areas highlighted and in [ ] to add your organisation’s name/email address etc or to tailor the information. You should complete the Personal Information Asset Register first then use the information it contains to complete this document.

If you are an individual, working in a professional capacity then please put your name in any place marked “Company Name”

Add your own logo if you have one and remove this text box before saving a final version

**Data Protection**

**Privacy Policy**

**[insert company name]**

Data protection

***[insert company name] ([insert ‘known as name’]) is a data controller registered with the UK*** [***Information Commissioner’s Office***](https://ico.org.uk/) ***(Registration Number: [insert ICO registration number]).***

Keeping your personal information safe is very important to me. I am committed to complying with privacy and data protection laws and being transparent about how I process personal data.

I have policies, procedures and training in place to ensure that I understand and follow data protection best practice and comply with the legal requirements and responsibilities.

This privacy policy relates to the use of any personal information I process about you.

How I collect personal data

I may collect your personal data in different ways, for example:

* when you, your parent or guardian communicate with me by post, telephone, SMS, email or via our website or social media
* from the information you provide to me when you join as a client
* as you interact with me in other ways; as a contractor, or in any other capacity

How I use personal information

I collect and use personal information about clients, staff and job applicants 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]

[**Informing clients about *[insert company name]*  events and services**](#NonMembers)

[**Provision of training to clients**](#Training)

**[Running events and camps](#RunningEvents)**

**[Dealing with complaints and appeals](#Complaints)**

**[Undertaking safeguarding activities](#Safeguarding)**

## [Employee administration](#Employees)

## [Employee and volunteer recruitment](#Recruitment)

I only collect personal information that I genuinely need.

This may include:

* Contact details such as name address, email address and phone numbers
* Credit card details or bank account details
* Date of birth and gender
* Any Special Educational Needs (SEN) requirements that are relevant to client lessons, including relevant medical records
* Dietary requirements where this is required for catering
* 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, I 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

Informing potential clients about ***[insert company name]***  events and services

If you opt in to my mailing list or sign up to my social media accounts I will use the information that you provide to contact you with information about events, courses, services and other items of interest. You can opt out or unsubscribe from receiving this information at any time if you wish. The legal basis for using your personal information in this way is **Consent**.

Provision of training to clients

If you sign up as a client, I will use the information that you provide to me to process your registration and provide the agreed training to you. The 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 an event or camp, I will use your information provided to me to process your registration and enable you to attend the event or camp. This will include sharing some of your information with any volunteers that run the event or camp. It may also include collecting and sharing medical information with them if you choose to provide that to me. Our legal basis for using your personal information in this way is for the **Performance of a Contract**.

If you choose to provide me with your dietary requirements I may sham them with third parties that I use to provide catering at our events.

Dealing with complaints

If a complaint or an appeal is raised with me, I will process the personal information that is provided to me to manage and resolve the complaint or appeal. This may include sharing relevant information with an affiliated organisation, such as The BEF or a riding club, 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 **Legitimate Interests** and fulfil my objective of resolving complaints in a careful and appropriate manner.

Undertaking safeguarding activities including DBS checks and casework

When necessary, I process relevant personal information for safeguarding purposes. It may be necessary to share some personal information with relevant authorities such as the Police or an appropriate member of the respective Member Body – such as The BEF, The Pony Club or a BRC Riding Club (as appropriate to the safeguarding activity). The legal basis for this processing is to fulfil a **Legal Obligation**.

Employee administration and professional development of staff

I will process personal information of employees to fulfil the contract with them. This includes payroll processing and the provision of training. I am required by law to share some financial information with the HMRC. I may also need to share some personal information with other organisations, for example solicitors, pension providers. Our legal basis for using information for this is for the **Performance of a Contract**.

Employee and volunteer recruitment

If you provide me with information about yourself, such as a resume or curriculum vitae, in connection with a job vacancy, I may use this information to process your enquiry. I will not store this information for any purpose other than that relating to your application. The legal basis for using your information in this way is **Legitimate Interests**.

Sensitive Data

Some information, such as health records are classified as Sensitive Personal Data. I will only process sensitive personal data if I have your explicit consent. In extreme situations, I may share your personal details with the emergency services if I 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

I will only share your personal information where I am required to fulfil my contract with you, or for legitimate interest, where I have your consent, or I am required to do so by law.

If necessary, I may share your information with caterers or other third parties necessary when running events or camps.

I may also share your information with our bank to process a payment; my professional advisers (such as our legal advisers) where it is necessary to obtain their advice; and IT support partners.

I process employee personal information to fulfil my contracts with employees and fulfil my legal obligations as an employer.

Where required, I will process personal information to comply with other legal obligations. In this respect I 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]

I may need to collect or send some personal information outside of the UK or EEA, for example for data storage purposes. If I transfer personal information to countries or jurisdictions which do not have a similar standard of data protection law in place, I will only do so to fulfil our contract with you and I inform you in advance of the need to transfer the information. For information about international transfers of personal data, you can contact me here [insert your email address].

Your rights

If you no longer wish to receive communications about products and services from me, please contact [insert an email address that can be used for contact preference updates]. You can also unsubscribe at any time to emails that I may send to you about the products and services that I think will be of interest to you.

You also have the right to:

* Request a copy of the information I hold about you. Requests should be addressed to [enter the email address of your data protection lead]. I will respond within one calendar month of receiving your written request.
* Tell me to change or correct your personal information if it is incomplete or inaccurate. Please contact me at [insert an email address that can be used for contact preference updates]
* Ask me to restrict our processing of your personal data or to delete your personal data if there is no compelling reason for me to continue using or holding this information. Please contact me at [enter the email address].
* Receive from me the personal information I hold about you which you have provided to me, in a reasonable format specified by you, so that you can send it to another organisation. Please contact me at [enter the email address].
* 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 me at [enter the email address].

Please note that I may be entitled to refuse requests where exceptions apply: for example, if I have reason to believe that the personal data I hold is accurate or I can show our processing is necessary for a lawful purpose set out in this Privacy Policy.

How long I keep your personal information

I will hold your personal information for as long as is necessary for each purpose. I will not retain your personal information if it is no longer required. In some circumstances, I may legally be required to retain your personal information, for example for finance, employment or audit purposes.

[Tailor this section to your organisation. I 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]

* I will keep full client records for two years after the client has stopped using my service, in order to fully manage client needs. Some client information will be held for a longer period, to comply with HMRC, insurance and any other legal obligations
* I will keep records of events and camps 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 I will provide you with an updated Privacy Policy from time to time.

Making a complaint to the Information Commissioner’s Office

If you am not satisfied with our response to any query you raise with me, or you believe I am 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.**