

# Preparing for the General Data Protection Regulation (GDPR) – Privacy Policy

## INTRODUCTION

The IHSGB Ltd. is committed to protecting and respecting your privacy. This Policy explains when and why we collect personal information about people who become an IHSGB member, sign up to our newsletter, if you visit our website or become a horse owner and are issued a passport; how we process it, the conditions under which we may disclose it to others and how we keep it secure.

**The IHSGB is** the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice). We may change this Policy from time to time so please check this policy occasionally to ensure that you’re happy with any changes. By using our services or website, you’re agreeing to be bound by this Policy. Any questions regarding this Policy and our privacy practices should be sent by email to [chairman@ihsgb.co.uk](mailto:chairman@ihsgb.co.uk) or by writing to the Chairman.

## CONTACT DETAILS

The IHSGB Ltd company (no 3974594) is also a registered charity (no 1101183 (England & Wales), SCO39030 (Scotland)). The registered address is Midfield Farm, Gaisgill, Tebay, Cumbria. CA10 3UH. The IHSGB exists to maintain the purity of the Icelandic horse breed, to promote interest and protect the welfare of the breed, and to encourage Icelandic horse breeding and sport competitions. The IHSGB is a full member of FEIF, the International Federation of Icelandic Horse Associations.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

## HOW DO WE COLLECT INFORMATION FROM YOU?

We collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:
  - Become a member
  - Enter a competition or survey; or
  - Give us feedback.
  - As a Passport Issuing Organisation (PIO), we obtain information about you when you apply for a horse passport or when you lodge an existing horse passport with us
  - We may use cookies for analytics or reporting on our website
- **Third parties or publicly available sources:**
  - Any statistics on your visits to our Facebook or website are anonymous and not linked back to your personal data



- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as PayPal

## WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as follows:

- **Identity and Contact Data** as part of managing your membership.
- If you apply for a horse passport or when you lodge an existing horse passport with us as a PIO, we collect your personal data as required by Article 38(1) of EU Regulation 2015/262. Other, non-personal, data will also be collected as part of the equine passport application process, as required by Article 38(1) of EU Regulation 2015/262, for example equine details such as the country of birth, microchip number, date of birth, etc.
- **Financial and Transaction Data** as part of your financial interactions with the IHSGB.

## SENSITIVE DATA

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

## HOW IS YOUR INFORMATION USED?

We will only use your personal data when legally permitted, where it is necessary for our legitimate interests (or those of a third party) and where we need to comply with a legal or regulatory obligation.

This may include:

- process a donation that you have made;
- process orders that you have submitted;
- process grants we award to you;
- to carry out our obligations arising from any contracts entered into by you and us;
- business as a Passport Issuing Organisation (PIO);
- dealing with entries into a competition;
- Liaising with HMRC re. the collection of Gift Aid monies
- Providing information, at financial year end, to our Auditors for them to be able to examine and sign off our accounts
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you communications as part of your membership benefits.

## DISCLOSURES OF YOUR PERSONAL DATA

### Who has access to your information?

We will not sell or rent your information to third parties but we may have to share your personal data with the parties set out below:



**Third Party Service Providers working on our behalf:** We may pass your information to our third party service providers, and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to register you with WorldFengur) and share your information with the DEFRA family in order to meet our legal obligations as a PIO. Please be reassured that we will not release your information to third parties beyond the IHSGB for them to use for their own direct marketing purposes, unless you have requested us to do so (for example to Kramer equestrian as a member discount) or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

The relevant third party product provider will use your details to carry out their obligations. In some cases, they will be acting as a data processor of your information and therefore we advise you to read their Privacy Policy.

When you are using our secure online donation/payment pages, your donation is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

## DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those Society members and other third parties who have a business to need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Our Records Management Policy should be read in conjunction with this Privacy Policy. Where we have given a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## DATA RETENTION

We review our retention periods for personal information on a regular basis. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any membership contract, legal, accounting, or reporting requirements.

In some circumstances you can ask us to delete your data: see below for further information.

## YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access of your personal data
- Request correction of your personal data.
- Request erasure of your personal data subject to our legal obligations.
- Object to processing of your personal data subject to our legal obligations.
- Request restriction of processing your personal data.
- Right to withdraw consent.



You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at [membership@ihsgb.co.uk](mailto:membership@ihsgb.co.uk).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## COOKIES

Like many other websites, the IHSGB website may use cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They do not identify you as an individual. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements even if you access them using links from our website.

## Children under the age of 18

We are committed to protect the privacy of children under the age 18. If you are aged under 18, please get your parent/guardian's permission beforehand whenever you provide us with personal information. Please refer to our Safeguarding Policy available on the website.

## Review of this Policy

We keep this Policy under regular review. This Policy was last updated in April 2018.