



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 chair@ihsgb.co.uk or by writing to the Chair.

CONTACT DETAILS

The IHSGB Ltd. company (no. 3974594) is also a registered charity (no. 1101183 (England & Wales), SC039030 (Scotland)). The registered address is 45 High Street, Haverfordwest, Pembrokeshire, SA612BP. 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 riding 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 personal data, you have the right to raise a data protection complaint with us, which can be done by emailing chair@ihsgb.co.uk or by writing to the Chair at our registered address. We will acknowledge receipt of a data protection complaint within 30 days of receiving it, take appropriate steps to investigate and respond without undue delay, keeping you informed as appropriate, and tell you the outcome. If you remain dissatisfied following our response, you may complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

HOW WE COLLECT AND USE PERSONAL DATA

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

- **Direct interactions:** You may provide data by filling in forms on our site or by communicating with us by post, phone, email, social media or otherwise.
- **Membership applications, administration and renewals.** We will record personal information required to set up the membership and carry out the request to join the society.
- **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 collect and use personal information to issue, replace and amend horse passports. Our legal basis for using personal information for this purpose is for the performance of a



contract. We will share some personal information with DEFRA under the lawful basis of legal obligation.

- **Managing and responding to horse welfare issues.** We will record and use relevant personal information provided to us relating to potential horse welfare issues and concerns. Where necessary, we will share relevant personal information with other organisations such as the RSPCA and the police. Our legal basis for using information for this purpose is that 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 (Animal Welfare Act 2006 Section 12 - Regulations To Promote Welfare).
- **Processing Donations and Legacies.** If you kindly donate to us, we will use your personal information to collect your donation and maintain a record of our supporters. We will also liaise with HRMC with regards to collection of Gift Aid Monies received. Our legal basis for using your personal information for this purpose is to fulfil our legitimate interest and fundraising objective. We may use cookies for analytics or reporting on our website
- **Applications and provision of membership bursaries.** If you apply to for one of our bursaries, we will use your information provided to us to process your application.
- **Completing a survey or giving us feedback.** If you choose to take part in one of our surveys, or give feedback, we will use the personal information that you provide to process the results of the survey and undertake analysis. We will not share the personal information that you provide in a survey with any other organisations. Survey results will be anonymised before being shared or published.
- **Enter a competition.** If you choose to take part in a competition run by the IHSGB, we will use the personal information that you provide to administer the competition when dealing with entries to competitions. We will inform the winners and carry out some publicity involving the winners. This may be on our website, in our magazine or on Social Media platforms. We will not share the personal information that you provide in a survey with any other organisations unless we have your explicit consent to do so.
- **Running events and camps.** If you register for one of our events or camps, we will use your information provided to us to process your registration and enable you to attend the event or camp. This will include sharing some of your information with our volunteers that run the event or camps. It may also include collecting and sharing medical information with them if you choose to provide that to us. Our legal basis for using your personal information in this way is for the performance of a contract.
- **Provision of training courses to individuals** If you sign up to one of our training courses, we will use the information that you provide to us to process your registration and provide the course to you. Our legal basis for using your personal information in this way is for the performance of a contract.
- **Provision of exams or Youth badges to individuals** (who are or will become a member to take the exam). If you apply to undertake one of our exams or educational programs, we will use your information provided to us to process your application and enable you to undertake the exam. This will include sharing some of your information with the examiner. It may also include sharing your results with your trainer / coach and collecting and sharing medical information with your examiner if you choose to provide that to us and if it is necessary. Our legal basis for using your personal information in this way is for the performance of a contract.



- **Fulfilling purchases from our online shop.** If you choose to make a purchase from our online shop, we will use your information you provide to fulfil your purchase. Our legal basis for using your personal information for this purpose is for the performance of a contract. We will share relevant information with our order fulfilment house to deliver your purchase. We may occasionally also use your contact information to email you information about similar products that you might be interested in. You can choose to unsubscribe from receiving these communications at any time.
- **Undertaking governance** - trustee and committee members, elections. We process relevant personal information about existing and potential trustee and committee members for governance purposes, including elections. This might include undertaking DBS and other checks to identify any criminal and other activity we need to be aware of to ensure that we select appropriate trustees and committee members. Our legal basis for this processing is to meet our legal obligations with the Charity Commission and Companies House.
- **Undertaking safeguarding activities.** These include DBS checks and casework. When necessary, we process relevant personal information about members, volunteers, coaches, board members or other individuals for safeguarding purposes. This might include undertaking DBS and other checks to identify any relevant criminal activity. DBS checks carried out on Trustees, management and volunteers: 6(1)(c)– Legal Obligation
We may also process personal data as part of safeguarding casework activities. This data may relate to the reporter of an allegation, the victim of an allegation or the alleged perpetrator. It may be necessary to share some personal information with relevant authorities such as the Police, The Safeguarding Advisory Board and an appropriate member of the respective Member Body – such as FEIF, The Showing Council (as appropriate to the specific safeguarding activity). Data sharing will only be carried out where there is a reasonable belief that the transfer of any data could prevent further criminal activity.
The lawful basis for processing data for these safeguarding activities, to protect young people and vulnerable adults, is
6(1)(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.
Special Category data is processed under article 9 (2) (g) of the GDPR – Processing is necessary for reasons of substantial public interest - and Parts 1-3 of Schedule 1 of the Data Protection Act 2018.
For any further information, please refer to our safeguarding policy on the IHSGB website.
- **Recording safety incidents and accidents.** We record and retain relevant personal information about accidents, incidents and near misses that are reported to us. Our legal basis for this processing is to fulfil our legitimate interest and organisational objective to ensure every horse and rider is as safe as possible. We analyse the information provided to us and use the statistics to lobby those in power to make the changes that are required to ensure riding is safer for all.
- **Processing expenses.** We will use your personal information including your bank account details to process expense claims. Our legal basis for using your information for this is for the performance of a contract.



Other forms of Personal data we may need include:

- Contact details such as name, address, email address and phone numbers
- Credit card details and any purchases you have made
- Date of birth and gender
- Any Special Educational Needs (SEN) requirements for exams
- Dietary requirements where this is required for catering. If you choose to provide us with your dietary requirements, we may share them with third parties that we use to provide catering at our events.
- Qualifications
- 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.
- Nationality

We will use the information that you provide to email and post you information about our events, courses, our services and other items of interest. You can opt out or unsubscribe from receiving this information at any time if you wish. Our legal basis for using your personal information in this way is consent.

Third parties or Publicity available sources:

- Any statistics on your visit to our Social Media accounts 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.

SENSITIVE DATA

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 like this or about criminal convictions and offences.

DISCLOSURE OF YOUR PERSONAL DATA

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, if deemed necessary for our legitimate interest and so long as its use is fair, balanced and does not unduly impact your rights.

- We may process special category data to carry out safeguarding activities to protect young people and vulnerable adults. The lawful basis for this is article 9 (2) (g) of the GDPR and Schedule 1, Parts 1-3 of the Data Protection Act 2018.

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 to meet our legal obligations as a PIO.



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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 Top Reiter 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.

We may share your personal information with third party organisations who will process it on our behalf, for example a mailing house, our website administrator or printers.

If necessary, we may also share your information with caterers, course providers, referees, and coaches.

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

Where required, we will process personal information to comply with our legal obligations. In this respect we 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.

In extreme situations, we may share your personal details with the emergency services if we believe it is in your 'vital interests' to do so. For example, if someone is hurt or taken ill during one of our events.

Very occasionally we may share personal data with the relevant authorities, such as the Police, The Safeguarding Advisory Board and an appropriate member of the respective Member Body – such as FEIF, and Showing Council (as appropriate to the specific safeguarding activity). Data sharing will only be carried out where there is a reasonable belief that the transfer of any data could prevent further criminal activity.

TRANSFERRING PERSONAL DATA OUTSIDE OF THE PIO

We may need to collect or send some personal information outside of the PIO, for example for horse passports. If we transfer personal information to countries or jurisdictions which do not have a similar standard of data protection law in place, we will only do so to fulfil our contract with you and we inform you in advance of the need to transfer the information. For information about international transfers of personal data, you can contact studbook@ihsgb.co.uk

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,



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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/uk-gdpr-guidance-and-resources/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at 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.



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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 AND AGGREGATE INFORMATION COLLECTED

Like many other websites, the IHSGB may use cookies and log files on our website, to store information about how and when you visit. 'cookies' are small pieces of information 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, but please note that some parts of our website may become inaccessible or not function properly.

Aggregate information is collected from users using our own web tracker. This information includes users' Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time of visit, number of clicks, error pages and number of unique visits.

This information is not linked to personal profiles or to personally identifiable information provided by users. We use it to analyse visitor trends and use of our website, administer the website and to gather broad demographic information of our website users. Our legal basis for using your information in this way is for our legitimate interest.

THIRD-PARTY LINKS

Our 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.

18 OR UNDER

We are committed to protect the privacy of children aged 18 or under. If you are aged 18 or under, 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.

Author: Linda Frith, Communications Trustee

Adopted: 7th April 2025

Updated: 15th June 2026