

Annex D

British Equestrian Federation Privacy Policy

British Equestrian Federation commitment to Privacy

We at the British Equestrian Federation (BEF) (“we” or “our” or “us”) want to make sure all the personal information we have collected about you is safe and secure whether we collect it through our websites or from other sources including from our Member Bodies. This Policy set outs our commitments to you, in compliance with the Data Protection Act 2018 and explains how we collect, store and use your personal information.

The information we collect about you

Generally, the BEF receives data about individuals from one or more of the following sources:

- directly from you. Your name, email address, postal address and any other information you voluntarily provide to us via email, phone calls, our website and any online forms and surveys. This may include data such as, career or educational history, qualifications, sporting results, details of equines, bank account details, name, address, contact information, age, gender, medical information, passport information, credentials for judges, vets and support staff members;
- from the web server - your IP address (which is a unique identifier that computers and devices use to identify and communicate with each other) which is automatically recognised by our web server;
- from third parties, for example, employers and/or academics may provide references, assessments or details of academic results; coaches may provide assessments or comments; the FEI, member bodies and/or outsourced service or technology platform providers may provide rider, owner, horse or other information, competition results and/or testing results;
- from third parties or individuals themselves in connection with the marketing and promotion of the BEF and its activities; and
- occasionally from an individual’s legal and/or financial representatives.

Information from Member bodies

We may be provided with information about you as a direct member of one or more of our member bodies. Our member bodies are:

- The Association of British Riding Schools,
- British Carriage Driving,
- British Dressage,
- British Equestrian Trade Association,

- British Eventing,
- British Equestrian Vaulting,
- British Grooms Association,
- The British Horse Society,
- The British Horseball Association,
- British Reining,
- British Showjumping,
- Endurance GB,
- Mounted Games Association of Great Britain,
- The Pony Club,
- Riding for the Disabled Association,
- The Showing Council,
- UK Polocrosse Association,
- World Horse Welfare.
- The British Horse Foundation

The information which may be shared with the BEF may include: name, date of birth, gender, membership number, email address, address, telephone number, name of the member body of which you are registered as well as additional information relating to requirements as an equestrian National Federation. It may also include additional information such as competition records, qualifications, training records for FEI officials.

How we use your information

We may use your personal information for a number of purposes, including:

- to deal with your requests and enquiries, for example the provision of equine passports, rider licences;
- to contact you for reasons related to your enquiry;
- to provide information to the FEI as required for international equestrian competitions and supporting training;
- as a National Governing Body, to enable us
 - to run British equestrian sport, for example to ensure the proper administration of the national anti-doping programme and safeguarding practices etc; and progress British equestrian sport – e.g., to improve results at elite-level / international events, we may analyse horse and/or rider performance and results and conduct research etc.;
- to use your IP address to monitor traffic and gather browsing behaviours of visitors to our websites. We will not use your IP address to identify you in any way

Our legal bases for processing your information

We will process your personal information if we:

- have asked you and have your express consent to do so; or
- have a legitimate interest to do so in order to support the work we do; or
- have a contract with you that we can only fulfil by using your personal information; or
- have a legal obligation to use or disclose information about you. For example, we will process and share personal data in relation to horse passports and FEI recognition cards as a legal obligation to the Central Equine register, managed by Defra; or
- have a basis under vital interests in relation to safeguarding of children and adults at risk.

If you are a user with general public and anonymous access to the BEF's websites, the BEF will not store or capture your personal information but will merely log the user's IP address that is automatically recognised by the web server.

Who will we share information with?

The BEF works with partner organisations which all have a legitimate role to play in delivering the functions of a national governing body. Partners, in this context, are taken to be, but not limited to:

- all 19 member bodies of the BEF
- UK Sport and Sport England
- the BOA and the BPA
- FEI and associated National Federations
- UK Anti-Doping (UKAD)
- The International Testing Agency
- CPSU and Ann Craft Trust
- our Press Agency
- organisations or individuals delivering specific activities on behalf of the BEF under a specific contract or agreement (e.g. World Class consultants); and
- outsourced service providers or sports technology platform providers (including providers of wearable technology).

We will only share your information with these partner organisations where it is needed for the purpose outlined above and, where possible, will anonymise the data before sharing. If we would like to share your information for any other purpose we will ask for your consent except in the following circumstances (which you are not entitled to opt out from):

- We will disclose your personal data to any appropriate investigative third party if we believe that you are involved in any illegal or harmful conduct or if we are required to do so by law or we believe that such action is necessary to (1) comply with the law or with legal process; (2) protect and defend our rights and property or that of our users; (3) prevent fraud; (4) protect against abuse, misuse or unauthorised use of the Website; or (5) protect the personal safety or property of

our users or the public (e.g. if you provide false or deceptive information about yourself or attempt to pose as someone else, we will disclose such information about you as we have to assist any type of investigation into your actions).

- We may employ other organisations to provide services for us, including for example, processing of data. These organisations have access to the personal data needed to perform their functions and not for any other purposes. They are bound by confidentiality agreements not to disclose any information for any other purpose.

When we collect information from you, we will tell you if we would like to send you information about our products and services. We will give you the opportunity to opt in to any such communications and will tell you how you can opt-out at any time.

If we wish to share your data with third parties for marketing purposes, we will tell you about this and only do so if we get your explicit consent.

In all instances where we disclose your information to third parties, we will ensure that your information is appropriately protected.

Protecting your information

The data that we collect from you may be transferred to a destination external to BEF's own secure network. We may transfer your data outside the European Economic Area where necessary for international competitions. Most of this information is shared with the FEI, which is based in Switzerland and is recognised as having an 'adequate level of protection' by the Information Commissioner's Office.

We will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy.

Surveys

We regularly carry out surveys using a third party provider, Survey Monkey (www.surveymonkey.com). The majority of our surveys will be anonymous but when we collect your personal data we will ask you for your consent. If you have provided consent to participate, we will transfer your data to Survey Monkey for these purposes only. In each survey, we will clearly tell you what data we are collecting, and provide a link to terms and conditions for any incentives offered to take part in that survey. We do not link any other information about your browsing activity with the survey data, which is stored separately.

Retention of Personal Data

We keep personal data for as long as, but no longer than is necessary for the particular purposes for which it is held or for any period that might be required by law. Where there is no further requirement to use, hold or store personal data and the law does not require us to do so, we shall remove it from our records and systems. Our retention of personal data is strictly on the basis of the clear and justifiable existence of a lawful basis for processing.

It is not possible in this policy to explicitly state how long personal data should be retained for as this will vary considerably depending on the type of data and the lawful basis for its processing. The overriding rule is that the 'storage limitation' Data Protection Principle will apply in all cases:

“Data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed”

Data Subject Rights

Individuals have certain rights under data protection laws (**Rights**). These are:

- the right of access (also known as a data subject access request)
- the right to rectification
- the right to erasure (also known as the right to be forgotten)
- the right to restrict processing
- the right to data portability
- the right to object
- rights in relation to automated decision making and profiling.

The exercise of these Rights may be made in writing, including email, and also verbally and should be responded to in writing by us (if we are the relevant data controller) without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We must inform the individual of any such extension within one month of receipt of the request, together with the reasons for the delay.

Where the data subject makes the request by electronic form means, any information is to be provided by electronic means where possible, unless otherwise requested by the individual.

If we receive the request from a third party (e.g. a legal advisor), we must take steps to verify that the request was, in fact, instigated by the individual and that the third party is properly authorised to make the request. This will usually mean contacting the relevant individual directly to verify that the third party is properly authorised to make the request.

Service and marketing messages

If you are currently receiving messages or marketing communications from BEF and no longer wish to do so, please let us know by contacting us at info@bef.co.uk

Finding out what information BEF holds about you

Under the Data Protection Legislation, you can ask to see any personal information that we hold about you. Such requests are called subject access requests. If you would like to make a subject access request, please contact the BEF:

British Equestrian Federation
Equestrian House
Abbey Park
Stareton
Kenilworth
CV8 2RH

You will also need to provide two forms of identification, for example, driving licence, utility bill or passport and, if appropriate, any particulars about the source or location of the information you are requesting.

Contacting BEF about this Privacy Policy

If you have any questions or comments about this Privacy Policy please write to us:
British Equestrian Federation, Equestrian House, Abbey Park, Stareton, Kenilworth,
Warwickshire CV8 2RH.