

Client data

DATA PROTECTION POLICY, INCLUDING CLIENT PRIVACY

Updated 20th May 2018

This policy sets out the obligations of EER Education Limited and all its associated companies (to include Lavant House Stables LLP, Lavant Indoor Riding School Ltd) hereon known as the 'businesses', for compliance with the General Data Protection Regulation and the rights of our clients, staff and other business contacts.

We are committed to uphold the law of data protection and we place high importance on the correct, lawful and fair handling of any personal data.

Our Data Protection Officer is our Operations Manager to whom any concerns or questions should be directed.

Data processing

Within these companies we will process any personal data lawfully and fairly, and in a transparent manner, with the consent of the data holder. All data will be processed to ensure appropriate security of information given, and it will be protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage by using appropriate processes. All data will be held manually in a secure manner, and/or electronically on a secure server.

It is a requirement for health and safety reasons, for all clients to supply certain personal data by completing a Rider Registration Form. All information held on this will be used as detailed in this policy. Refusal to hold this personal data may result in the 'contract' being terminated.

After the 'contract' is terminated, and personal data is no longer required for health and safety reasons, the client has the right to ask for said data to be removed.

Data collection/sharing

Data will be collected and used for legitimate purposes only, and only shared with relevant third parties for the purpose of marketing direct campaigns and personalised online marketing only. This is to include collection of data for the purpose of statistical information to enhance business practices, and to keep clients updated with promotions and offers. Data will not be shared with other third parties.

Accuracy of data held

Every endeavour will be made to ensure accurate data is held. In the event of any errors, it will be rectified without delay. Clients may be contacted periodically to request updated information, but it is also the personal responsibility of the client to ensure that any changes are informed in writing to the office address/email.

Data retaining

Manual data will be held for a period of one year. After this time data will continue to be stored electronically on a secure server for no longer than is necessary for the purpose of the data collected. In certain circumstances manual paperwork may be required to be retained for longer periods in accordance with legal requirements ascertaining to Insurance claims.

Financial data

Direct debit - In accordance with the membership terms, where monies are due by process of Direct Debit, the Direct Debit guarantee will be adhered to, alongside the current storage of data relating to Direct Debit rules.

Electronic payments are received in accordance with the relevant banking authority guidelines. Card details are not kept after each transaction.

Copies of financial records, including invoices, are held manually in a secure manner, and electronically on a secure server for the duration of the 'contract' and for a period after relating to the current requirements of holding the 'businesses' financial records relating to accounts procedures.

Contact Details Data (including email preferences)

Contact details such as email addresses and telephone/text numbers, will be held in accordance with our data protection policy for 3 reasons:

- To contact clients regarding their 'contracted' services – this is required and necessary so forms part of the 'contract' of services provided.
- For direct marketing and personalised online marketing purposes to 'contracted' data subjects – to keep clients informed of updates to services, price changes and any other activities/services the 'businesses' believe are directly associated. On termination of 'contract' the client may request that this is removed from their records.
- For direct marketing and personalised online marketing purposes to non-'contracted' data subjects – for updates of activities and services directly relating to the 'businesses'. These details can be removed immediately upon request.

Access to stored personal data

Access is only allowed by staff members who need to access the information to perform particular service tasks. The secure server used has password protection made available to relevant staff and managers. Certain data may be shared with relevant employees in order for the service requested to be carried out. Individual documents and databases containing personal data are password protected and stored on a secure server.

What to do if you object to the way your data is being stored/used

If you object to us holding certain data, or are unhappy with the way we are using this data and want us to remove your personal data, please inform us, in writing for the attention of our Data Protection Officer, and we will investigate this for you. If it is deemed that the data being held is necessary for reasons such as health and safety, or legal reasons, we will provide a full breakdown of this for you to consider. Removal of certain data may restrict the services we can offer, but will be fully explained to you at the time of response to the complaint. In such instances that it has been agreed any data can be removed, only such personal data pertaining to that data subject that is

necessary to ensure no further processing of their personal data takes place will be retained, and in any case held in accordance with the data protection policy.

Unless we have reasonable grounds to refuse to erase personal data, all requests shall be complied with, and the data subject will receive confirmation that this has been done within one month.

Social Media

Any related social media pages are accessed by the data subject. If at any time you wish to be deleted and it is not possible to delete/remove yourselves please let us know and we will remove you immediately.

Data Breach Notification

If a personal data breach occurs that is likely to result in a risk to the rights and freedoms of data subjects (eg financial loss, financial disclosure, breach of confidentiality, reputational damage or other significant social or economic damage), the details of the breach will without undue delay, and within 72 hours of being made aware of the breach, be disclosed to those involved and rectified.

Glossary

‘Contract’ – this may be a verbal or written agreement in which services relating to the businesses are provided/received, whether contracted, on membership, or casual services.

‘Businesses’ – all businesses directly associated with EER Education Limited, Lavant House Stables LLP and Lavant Indoor Riding School Limited.

Rider Registration Form – this is a legal document required to be completed by any potential or current client.

Data subjects – persons supplying personal data to the ‘businesses’

Clients – those entering a verbal or written contract for us to provide any associated services of the ‘businesses’.

HR Related Data

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Data processing

Potential employees are required to complete an application pack prior to possible employment. If successful to interview stage, the application pack will be discussed with relevant employees.

Application data will be processed fairly within the terms of the law.

Personal data such as height and weight are only requested and considered for welfare reasons to horses when applying for a yard/rider/instruction role.

Application packs are kept manually in a secure location, within the required data protection laws until the position has been filled. Any application packs from applicants not successful will be destroyed within one month.

References are requested in accordance with the application pack consent upon acceptance of position.

Data retention

Employee personal data, including application pack, references, staff information, medical questionnaire and any other relevant employee data will be held manually in a secure location, and electronically on a secure server for the duration of employment.

Any legal checks such as DBS checks, documentation will be held in accordance with the current requirements.

Data access

Access to these records is only permitted to Management level employees and above.

Within 3 months of termination of employment all manual data will be destroyed. Electronic copies of any associated personal data relating to the employee may be held on a secure server for up to 6 years, unless deemed necessary to increase this time period for legal reasons or if the 'businesses' feel necessary to reasonably protect their interests.

Sharing of data

Data will not be shared outside of the 'businesses' to any third parties relating to marketing.

Data will be shared with third parties relating to HR requirements of the business, for example HR processing company, and Payroll processor. These third parties will also be GDPR compliant.

Social Media

Any related social media pages are accessed by the data subject. If at any time you wish to be deleted and it is not possible to delete/remove yourselves please let us know and we will remove you immediately.

Data Breach Notification

If a personal data breach occurs that is likely to result in a risk to the rights and freedoms of data subjects (eg financial loss, financial disclosure, breach of confidentiality, reputational damage or other significant social or economic damage), the details of the breach will without undue delay, and within 72 hours of being made aware of the breach, be disclosed to those involved and rectified.

Glossary

'Contract' – this may be a verbal or written agreement in which services relating to the businesses are provided/received, whether contracted, on membership, or casual services.

'Businesses' – all businesses directly associated with EER Education Limited, Lavant House Stables LLP and Lavant Indoor Riding School Limited.

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Supplier Data

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We are committed to uphold the law of data protection and we place high importance on the correct, lawful and fair handling of any personal data.

Our Data Protection Officer is our Operations Manager to whom any concerns or questions should be directed.

Data processing

Within these companies we will process any Supplier data lawfully and fairly, and in a transparent manner, with the consent of the data holder. All data will be processed to ensure appropriate security of information given, and it will be protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage by using appropriate processes. All data will be held manually in a secure manner, and/or electronically on a secure server.

Data collection/sharing

Data will be collected and used for legitimate purposes only, and only shared with relevant third parties. This is to include collection of data for the purpose of statistical information to enhance business practices, and to keep in contact with suppliers.

Data will be shared with third parties relating to Accountancy practices of the business. These third parties will also be GDPR compliant.

Accuracy of data held

Every endeavour will be made to ensure accurate data is held. In the event of any errors, it will be rectified without delay. Suppliers may be contacted periodically to request updated information, but it is also the responsibility of the supplier to ensure that any changes are informed in writing to the office address/email.

Data retention

Data including copies of financial records and invoices, are held manually in a secure manner, and electronically on a secure server for the duration of the 'contract' and for a period after relating to the current requirements of holding the 'businesses' financial records relating to accounts procedures. Any payment details will be processed according to bank regulations.

What to do if you object to the way your data is being stored/used

If you object to us holding certain data, or are unhappy with the way we are using this data and want us to remove your data, please inform us, in writing for the attention of our Data Protection Officer, and we will investigate this for you. If it is deemed that the data being held is necessary for reasons such as health and safety, or legal reasons, we will provide a full breakdown of this for you to consider. If compliant all data will be removed within one month.

Social Media

Any related social media pages are accessed by the data subject. If at any time you wish to be deleted and it is not possible to delete/remove yourselves please let us know and we will remove you immediately.

Data Breach Notification

If a data breach occurs that is likely to result in a risk to the rights and freedoms of data subjects (eg financial loss, financial disclosure, breach of confidentiality, reputational damage or other significant social or economic damage), the details of the breach will without undue delay, and within 72 hours of being made aware of the breach, be disclosed to those involved and rectified.

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