

# Privacy Statement

## 1. Introduction

Grovely Riding Centre understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all those that we deal with and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

This Privacy Statement will explain:

- What personal data we will collect
- How we will collect, use, and process personal data
- The lawful basis for processing personal data
- How we comply with our legal obligations
- Who we will share your personal data with
- How we safeguard your data
- How long we keep your data
- Your rights under the law relating to your personal data

Any questions relating to our Data Processing activities should be sent in writing to Grovely Riding Centre Water Ditchampton Wilton SP2 0JB

## 2. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the 'GDPR') as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in this Privacy Statement.

## 3. What personal data do we collect?

We may collect some or all of the following personal data (this will vary according to your relationship with us):

- Name
- Date of birth
- Address
- Email address
- Telephone number
- Business name
- Job title
- Profession
- Payment information, including bank details
- Information about your preferences and interests
- CCTV footage if you attend our premises

#### **4. How do we use your personal data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you
- Personalising and tailoring our services for you
- Communicating with you. This may include responding to emails or calls from you
- Supplying you with information by email about our services

We will also hold customer and prospective customer data for marketing and promotional activities. As our main area of work is providing restoration, conservation, refurbishment, remodelling works and associated services we will use your data as follows to help us achieve this:

- Storing your details and updating them when necessary on our database, so that we can contact you in relation to our services and information that may be of interest to you or your business
- Keeping records of our conversations and meetings, so that we can provide targeted services to you
- Processing your data for targeting appropriate marketing campaigns

We may process the data of our customers and prospective customers for these purposes if we deem this to be necessary for our legitimate interests. Article 6(1)(f) of the GDPR provides that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by us, except where such interests are overridden by the interests or fundamental rights or freedoms of you which require protection of personal data."

We do not believe that any of our activities prejudice individuals in any way. We genuinely believe that they help us to offer businesses a tailored, efficient service. However, you do have the right to object to us processing your personal data on this basis. You can do this by contacting us using the contact details provided at the start of this Privacy Statement. We will seek to deal with your request without undue delay, and in any event within one month, subject to any extensions to which we are lawfully entitled. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

#### **5. How long will we keep your personal data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

Grovely Riding Centre operates a clear Retention policy and associated Retention Schedule to ensure personal data is kept only for so long as is necessary for the purpose for which such information is used.

If any of your personal data changes, or if you have any questions about how we use data which relates to you, please contact us. We normally update your personal data within seven working days of any new or updated personal data being provided to us, to ensure that the personal data we hold about you is as accurate and up to date as possible.

#### **6. How and where do you store or transfer my personal data?**

We will only store your personal data within the European Economic Area (the 'EEA'). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

#### **7. Do you share my personal data?**

8. We will not share any of your personal data with any third parties for any purposes, except where it is necessary for the performance of a contract, such as a third party providing services on our behalf; or where we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 9. What are your rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Statement should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the contact details provided in this Privacy Statement
- The right to access the personal data we hold about you
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have
- The right to restrict, i.e. prevent, the processing of your personal data
- The right to object to us using your personal data for a particular purpose or purposes
- The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way

For more information about our use of your personal data or exercising your rights as outlined above, please contact us to find out more or to ask any questions using the contact details provided in this Privacy Statement.

Further information about your rights can also be obtained from the Information Commissioner's Office. If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 10. How can I access my personal data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a 'Subject Access Request'.

All subject access requests should be made in writing and sent to the email or postal addresses provided in this Privacy Statement. To make this as easy as possible for you, a Subject Access Request form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 11. Changes to our Privacy Policy

Any changes we may make to our Privacy Statement in the future will be posted to our website.