

PRIVACY POLICY

1. Introduction

1.1 We are committed to safeguarding the privacy of our members.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of our members; in other words, where we determine the purposes and means of the processing of that personal data.

1.3 In this policy, “we”, “us” and “our” refer to WALES & BORDER HARNESS RACING LTD.

2. How we use your personal data

2.1 In this Section 2 we have set out:

- (a) the general categories of personal data that we may process.
- (b) the purposes for which we may process personal data; and
- (c) the legal bases of the processing.

2.2 We may process your membership details. The membership data may include your name, company name (if applicable), address, gender, date of birth, contact telephone numbers and email address. The account data may be processed for the purposes of operating our website, providing our membership services, ensuring the security of our website, maintaining back-ups of our databases and communicating with you.

2.3 We process information relating to transactions, including purchases of your membership or other fee's that may incur.

2.4 We may process information that you provide to us for the purpose of newsletters and other essential correspondence.

2.5 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

2.6 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

2.7 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.8 Please do not supply any other person's personal data to us, unless you have permission from that person to do so.

3. Providing your personal data to others

3.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.2 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. Retaining and deleting personal data

5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Your rights

6.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

6.2 Your principal rights under data protection law are:

- (a) the right to access.
- (b) the right to rectification.
- (c) the right to erasure.
- (d) the right to restrict processing.
- (e) the right to object to processing.
- (f) the right to data portability.
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

6.3 You have the right to have any inaccurate personal data about you rectified and, considering the purposes of the processing, to have any incomplete personal data about you completed.

6.4 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or

otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

6.5 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

6.6 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

6.7 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

6.8 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

6.9 You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this Section 7.



7. Our details

7.1 We are registered in England and Wales under registration number 12491293, and our registered office is at Kings Arms Vaults. Watton, Brecon. LD3 7EF.

7.2 Our principal place of business is at the registered address above.

Chair of Wales and Border Harness Racing Ltd.

Sign:

A handwritten signature in black ink, appearing to read 'John', is written over a light grey rectangular background.

Date:01/04/2020