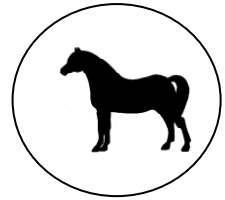


# **The Welsh Pony and Cob Society Cymdeithas y Merlod a'r Cobiau Cymreig**



Author: WPCS  
Review: November 2019

## **PRIVACY POLICY**

### **WHAT'S INCLUDED IN THIS PRIVACY NOTICE?**

The Welsh Pony and Cob Society is an equestrian society celebrating specific Welsh breeds of ponies and cobs.

This document (our “privacy notice”) sets out information relating to how we use personal information relating to individuals we have dealings with, including our members, our customers, owners and breeders of Welsh ponies and cobs, website users and Welsh pony and cob enthusiasts. It also sets out information about what rights individuals have in relation to their personal information and various other matters required under data protection law.

In particular, this privacy notice provides information to individuals about how they can object to our use of their personal information, how they can withdraw any permissions they have given to us to enable us to process their personal information and how they can make a complaint.

This privacy notice contains the following sections:

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## WHO DOES THIS PRIVACY NOTICE APPLY TO?

This privacy notice applies to:

- our customers;
- our members (and individuals who apply to us to become a member of the Welsh Pony and Cob Society);
- individuals who apply to passport or list their animals through us;
- individuals who judge equestrian events on our behalf (and individuals who apply to us to become Welsh Pony and Cob Society listed judges);
- individuals who use our website;
- individuals who subscribe to our newsletters or updates; or
- individuals who engage with us on social media.

In the sections below, when referring to the individuals listed above, we use the terms “you” or “your”.

## WHAT’S OUR APPROACH TO PRIVACY?

We take your privacy extremely seriously and want you to feel confident that your personal information is safe in our hands.

We will only use your personal information in accordance with data protection law applicable to England and Wales from time to time.

Under data protection law, when we use your personal information, we will be acting as a data controller. Essentially, this means that we will be making decisions about how we want to use your personal information and why.

Below, we summarise the main rules that apply to us under data protection law when we use your personal information:

<b>1.</b>	We must be upfront about how we intend to use your personal information and must use your personal information fairly. Providing privacy information to individuals (such as in this privacy notice) is one aspect of using personal information fairly.
<b>2.</b>	<p>We must only use your personal information if we have a legal basis to do so under data protection law. These legal bases include:</p> <ul style="list-style-type: none"> <li>• That you have consented to our use of your personal information;</li> <li>• That we need to use your personal information to perform a contract between us (or to take steps at your request prior to entering into a contract);</li> <li>• That we (or someone else) has a legitimate reason for needing to use your personal information and those legitimate interests are not outweighed by your rights or interests. We must balance our</li> </ul>

	<p>respective rights and interests before we can rely upon this legal basis; and</p> <ul style="list-style-type: none"> <li>• We need to use your personal information to comply with laws we are subject to.</li> </ul>
3.	We are only permitted to share your personal information with others in certain circumstances and if we take steps to ensure that your personal information will be secure.
4.	Generally speaking, we must only use your personal information for the specific purposes we have told you about. If we want to use your personal information for other purposes, we need to contact you again to tell you about this.
5.	We must not hold more personal information than we need for the purposes we have told you about and must not retain your personal information for longer than is necessary for those purposes (this is known as the “retention period”). We must also securely dispose of any information that we no longer need.
6.	We must ensure that we have appropriate security measures in place to protect your personal information.
7.	We must act in accordance with your rights under data protection law.
8.	We must not transfer your personal information outside the European Economic Area (“EEA”) unless certain safeguards are in place. One such safeguard is that the personal data is only transferred to a country that has been approved by the European Commission as having an acceptable level of data protection law.

## HOW WILL WE USE YOUR PERSONAL INFORMATION?

How we will use your personal information, the legal bases we will rely upon, how long we will keep your personal information and other details will depend upon who you are and why we need your personal information in the first place.

In this section, we provide specific privacy information relating to the different categories of individuals that this privacy notice applies to.

## **OUR CUSTOMERS, MEMBERS, INDIVIDUALS WHO PASSPORT OR LIST THEIR ANIMALS USING OUR SERVICES**

<b>What personal information may we use</b>	<ul style="list-style-type: none"> <li>• Your name;</li> <li>• Your address;</li> <li>• Your email address;</li> <li>• Your telephone number;</li> </ul>
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	<ul style="list-style-type: none"> <li>• Your date of birth</li> <li>• Bank or credit card details;</li> <li>• Details of any transactions, products sold or services provided;</li> <li>• Details of any complaints;</li> <li>• Details of any animals that you licence or list with the WPCS;</li> <li>• Details of microchip information applicable to any animal that you licence or list with the WPCS;</li> <li>• Breeder information in respect of animals that you licence or list with the WPCS.</li> </ul>
<b>How we will obtain the personal information</b>	<ul style="list-style-type: none"> <li>• Provided by you when ordering goods or services from us, submitting membership applications to us, submitting animal licencing or listing details or making a complaint.</li> </ul>
<b>What purposes we will use the personal information for</b>	<ul style="list-style-type: none"> <li>• We will use your name, address and other contact details to supply goods and/or services to you and to communicate with you about such supply. We will also use this information to deal with any complaints that you make;</li> <li>• We will use your bank or credit card details to take payment for goods and/or services, membership payments, and/or licencing or listing payments;</li> <li>• Other than your bank or credit card details, we will keep a record of the information listed above for our internal administrative purposes;</li> <li>• We will also use the above information (other than your bank and credit card details), for legal and regulatory purposes</li> </ul>
<b>The legal bases for processing we rely upon</b>	<ul style="list-style-type: none"> <li>• Our use of your personal information in connection with the supply of goods or services to you, taking payment, issuing and dealing with membership, licencing and listing requirements and dealing with any complaints is necessary for the performance of the contract between us;</li> <li>• Our use of your personal information for our internal administrative purposes is based on our legitimate interests in ensuring that our business is run properly and efficiently;</li> </ul>

	<ul style="list-style-type: none"> <li>Our use of your personal information for legal or regulatory purposes is necessary to enable us to comply with our legal and regulatory obligations and/or to enable us to bring, defend or deal with legal claims.</li> </ul>
<b>How long we retain the personal information and why</b>	<ul style="list-style-type: none"> <li>We only use your bank or credit card details for the purposes of taking payment. We do not store such information;</li> <li>We usually keep records relating to any purchase you make for six (6) years in case any contractual disputes or defective product claims arise.</li> <li>We usually keep records relating to your membership with the WPCS indefinitely for historical archiving purposes.</li> <li>We usually keep records relating to your listing or licencing of an animal with WPCS for thirty-five (35) years for legal and regulatory purposes.</li> </ul>
<b>Consequences of not providing/permitting us to obtain personal information</b>	<ul style="list-style-type: none"> <li>Without your name, contact details and payment information we will be unable to supply goods or services to you;</li> <li>Without your name, contact details, payment information and other details listed above, we will be unable to offer you membership to the WPCS or licencing or listing services through the WPCS.</li> </ul>

**INDIVIDUALS WHO ARE LISTED AS WPCS JUDGES OR APPLY TO BECOME WPCS LISTED JUDGES**

<b>What personal information we will use</b>	<ul style="list-style-type: none"> <li>Your name;</li> <li>Your address;</li> <li>Your email address;</li> <li>Your telephone number;</li> <li>Disclosure and Barring Service (DBS) checks and other criminal background checks where services are being provided for young and/or vulnerable people;</li> <li>Your date of birth.</li> </ul>
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<b>How we will obtain the personal information</b>	<ul style="list-style-type: none"> <li>• Provided by you when applying to become a WPCS listed judge or renewing your status as a WPCS listed judge.</li> </ul>
<b>What purposes we will use the personal information for</b>	<ul style="list-style-type: none"> <li>• We will use your name, address and other contact details to list you as a WPCS judge and to communicate with you in relation to such listing.</li> <li>• We will keep a record of the information listed above for our internal administrative purposes;</li> <li>• We will also use the above information for legal and regulatory purposes.</li> </ul>
<b>The legal bases for processing we rely upon</b>	<ul style="list-style-type: none"> <li>• Our use of your personal information in connection with the registration and listing of you as a WPCS listed judge is necessary for the performance of the contract between us;</li> <li>• Our use of your personal information for our internal administrative purposes is based on our legitimate interests in ensuring that our business is run properly and efficiently;</li> <li>• Our use of your personal information for legal or regulatory purposes is necessary to enable us to comply with our legal and regulatory obligations and/or to enable us to bring, defend or deal with legal claims.</li> </ul>
<b>How long we retain the personal information and why</b>	<ul style="list-style-type: none"> <li>• We usually keep public records relating to your listing as a WPCS judge for the duration of your listing and an internal record of your period as a Judge is kept indefinitely for historical archiving purposes.</li> </ul>
<b>Consequences of not providing/permitting us to obtain personal information</b>	<ul style="list-style-type: none"> <li>• Without your name, contact details and other information listed above, we will be unable to list you as a WPCS judge.</li> </ul>

**INDIVIDUALS WHO CONTACT US WITH ENQUIRIES VIA OUR WEBSITE, OUR SOCIAL MEDIA PLATFORMS, EMAIL OR IN PERSON AT EVENTS WE ATTEND OR SPONSOR**

<b>What personal information we will use</b>	<ul style="list-style-type: none"> <li>• Your name;</li> <li>• Your contact details (such as your telephone number or email address);</li> </ul>
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	<ul style="list-style-type: none"> <li>Details of your enquiry.</li> </ul>
<b>How we will obtain the personal information</b>	<ul style="list-style-type: none"> <li>Provided by you when you contact us (e.g. by making a phone call, emailing us or engaging with our members at events we attend or sponsor) or when you make an enquiry at our premises.</li> </ul>
<b>What purposes we will use the personal information for</b>	<ul style="list-style-type: none"> <li>We will use the personal information to deal with your enquiry;</li> <li>We will also make a record of your enquiry for internal administrative purposes.</li> </ul>
<b>The legal bases we rely upon</b>	<ul style="list-style-type: none"> <li>Our use of your personal information to deal with your enquiry is based on your implied consent and our legitimate interests in ensuring our business is run efficiently and effectively;</li> <li>Our use of your personal information for record keeping purposes is based on our legitimate interests in ensuring our business is run efficiently and effectively.</li> </ul>
<b>How long we retain the personal information</b>	<ul style="list-style-type: none"> <li>We retain the information relating to any enquiry until the enquiry is dealt with and for six (6) years thereafter in case of any dispute arising.</li> </ul>

#### **INDIVIDUALS WHO USE OUR WEBSITE OR SOCIAL MEDIA PLATFORMS**

<b>What personal information we will use</b>	<ul style="list-style-type: none"> <li>Technical information, including the internet protocol address used to connect your computer to the internet, your login information, browser type and version;</li> <li>Information about your visit.</li> </ul>
<b>How we will obtain the personal information</b>	<ul style="list-style-type: none"> <li>Some of the information is obtained by us automatically whenever you use our website;</li> <li>When you use our website we may gather information about you through Internet access logs, cookies and other technical means. 'Cookies' are text files placed on your computer to collect Internet log information and user behaviour information. These are used to track website usage and monitor website activity. Some of the cookies we use are essential for parts of the site to operate and have already been set. You may delete and block all cookies from our site, but parts of the site will not work. To find out more about the cookies we use</li> </ul>



	and how to delete them, please contact us on the contact details provided below.
<b>What purposes we will use the personal information for</b>	<ul style="list-style-type: none"> <li>The above information is used by us to help us to continually improve our website.</li> </ul>
<b>The legal grounds we rely upon</b>	<ul style="list-style-type: none"> <li>Our collection and use of the above information is based on our legitimate interests in ensuring that our website is user-friendly and appeals to our customers.</li> </ul>
<b>Consequences of not providing/permitting us to obtain personal information</b>	<ul style="list-style-type: none"> <li>If you disable our Cookies, you will be unable to use certain parts of/functions on our website. Additionally, the website will be less responsive to users needs as we will not have access to information on how people are responding to the on-line content.</li> </ul>

## WHEN WILL WE USE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING?

In addition to data protection law, if we use your personal information for direct marketing purposes, we may also be subject to additional rules that regulate direct marketing. The term “direct marketing” essentially means directing marketing material or advertising at a particular individual.

To ensure compliance with both data protection laws and the specific rules relating to direct marketing, we will only use your personal information to tell you about our latest offers or to inform you of products and services which we think may be of interest to you in the circumstances outlined below:

<b>Direct marketing by post</b>	<ul style="list-style-type: none"> <li>We will only contact you in this way if you have given us your express consent to do so.</li> </ul>
<b>Direct marketing by email, text or other forms of electronic communication</b>	<ul style="list-style-type: none"> <li>We will only contact you in this way if:             <ul style="list-style-type: none"> <li>you have given us your express consent to do so; or</li> <li>you are an existing customer/member and we want to tell you about similar products or services that may be of interest to you and you have not opted out of receiving such communications.</li> </ul> </li> </ul>

Our legal bases for such processing under data protection law will either be your consent or reliance upon our legitimate interests in developing our business.

We will retain your personal information unless and until you inform us that you no longer wish to receive direct marketing information from us. You can ask us to stop sending direct marketing to you at any time by contacting us using the details set out in this privacy policy or by clicking on the “unsubscribe” link within such electronic correspondence.

## **WHEN WILL WE SHARE YOUR PERSONAL INFORMATION WITH OTHERS?**

Sometimes, we will need to share your personal information with others. This section sets out details of who we will share your personal information with and why. It also tells you about our legal basis for doing so under data protection law and steps we will take to protect your personal information.

We will never sell your personal information on to third parties.

## **OUR SERVICE PARTNERS**

<b>Who are our service partners?</b>	<ul style="list-style-type: none"> <li>• Our service partners include: <ul style="list-style-type: none"> <li>• livestock auctioneers;</li> <li>• vets;</li> <li>• organisers of agricultural shows and events;</li> <li>• couriers and other suppliers of delivery services.</li> </ul> </li> <li>• We haven't included the names of our service partners in this privacy notice because their identity will change from time to time. However, if you would like further information about any of our current service providers, please contact us using the contact details set out in this privacy notice.</li> </ul>
<b>Why we need to share your personal information with them</b>	<ul style="list-style-type: none"> <li>• We may use the service partners described above to enable us to perform our contracts with you.</li> </ul>
<b>The legal bases we rely upon when sharing your personal information</b>	<ul style="list-style-type: none"> <li>• The sharing of your personal data with suppliers and sub-contractors is necessary for the performance of our contract with you.</li> </ul>
<b>What precautions do we take?</b>	<ul style="list-style-type: none"> <li>• We enter into contracts with our service providers which require them to put appropriate security measures in place and which restrict their use of your personal information.</li> </ul>

## **PROVIDERS OF INFORMATION TECHNOLOGY SERVICES**

<b>Who will we be sharing your personal information with?</b>	<ul style="list-style-type: none"> <li>Suppliers of information technology products and services such as Boyns.</li> </ul>
<b>Why we need to share your personal information with such providers</b>	<ul style="list-style-type: none"> <li>We use suppliers of information technology products and services in connection with the supply, maintenance and/or improvement of our IT network and the creation, development hosting and maintenance of our website;</li> </ul>
<b>The legal bases we rely upon when sharing your personal information</b>	<ul style="list-style-type: none"> <li>We rely upon our legitimate interests in ensuring that our business can function properly and efficiently and that our IT network is secure;</li> <li>The sharing of your personal data with analytics and search engine providers is based on our legitimate interests in having an efficient and user-friendly website.</li> </ul>
<b>What precautions do we take?</b>	<ul style="list-style-type: none"> <li>We enter into contracts with our IT providers which require them to put appropriate security measures in place and which restrict their use of your personal information.</li> </ul>

## **OTHER THIRD PARTIES**

We may also need to share your personal information with others in the following circumstances:

<b>If we sell, transfer or merge parts of our business or our assets</b>	<p>As we continue to develop our business we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. During any such process, we may need to disclose your personal information to other parties (such as potential purchasers or investors). Where we do so, we will be relying upon our legitimate business interests.</p> <p>However, we will only share your personal information in this way if the third parties in question agree to keep your personal information safe and private.</p> <p>Also, if, for example, a merger happens, the purchaser will only be able to use your personal information in the ways set out in this privacy notice.</p>
<b>Legal or regulatory requirements</b>	<p>On occasion, we may be required to disclose your personal information to organisations such as the courts</p>

	<p>or the police to comply with legal obligations we are subject to and/or to prevent fraud or crime.</p> <p>In particular we may work with the police, trading standards, the department for environment, food and rural affairs, and in respect of slaughter compliance checks. This is not an exhaustive list.</p>
<b>Protecting our business</b>	<p>From time to time we may need to disclose your personal information in connection with steps we need to take to protect our business interests or property. For example, if you default with payment, we may disclose your personal information to credit reference agencies or debt collection or tracing agents.</p>
<b>Professional advice and legal action</b>	<p>We may need to disclose your personal information to our professional advisers (for example, our lawyers and accountants) in connection with the provision by them of professional advice and/or the establishment or defence of legal claims.</p>

## **CIRCUMSTANCES IN WHICH WE WILL SEND YOUR PERSONAL INFORMATION OUTSIDE THE EEA**

We will generally only send your personal data outside the EEA in order to comply with a legal obligation.

If we do transfer your personal data outside the EEA, we will use one of these safeguards to make sure it is protected:

- We will only transfer it to a non-EEA country which the European Commission has decided has an adequate level of protection for personal data. You can find more about such countries here [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en); or
- We will put a written contract in place between us and the recipient that incorporates EC model clauses relating to the transfer of personal data outside the EEA. You can find out more about such clauses here [ICO/international transfers](#); or
- We will only transfer it to businesses that have signed up to a special agreement between the UK and the USA known as the Privacy Shield.

## **HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?**

We take various steps to protect your personal information while it is in our possession, including the implementation of appropriate security measures to protect our IT infrastructure;

You can help us to protect your personal information by adhering to the following security measures:

- Do not confirm your bank or credit card details in an email. We will not ask for such personal information in this way, so any email claiming to be from us that does so is likely to be fake. Please ignore it;
- Keep your passwords private;
- When creating a password, do not use words such as your name, date of birth or other personal data;
- Change your password regularly;

## WHAT RIGHTS DO YOU HAVE UNDER DATA PROTECTION LAW?

Under data protection law, you have a number of different rights relating to the use of your personal information. The table below contains a summary of those rights and our obligations. More information about your rights and our obligations can be found on the ICO website <https://ico.org.uk/>.

Your rights	What this involves	What our obligations are
<b>A right of access</b>	This is a right to obtain access to your personal data and various supplementary information.	<ul style="list-style-type: none"> <li>• We must provide you with a copy of your personal information and the other supplementary information without undue delay and in any event within 1 month of receipt of your request;</li> <li>• We cannot charge you for doing so save in specific circumstances (such as where you request further copies of your personal information).</li> </ul>
<b>A right to have personal data rectified</b>	<ul style="list-style-type: none"> <li>• This is a right to have your personal information rectified if it is inaccurate or incomplete.</li> </ul>	<ul style="list-style-type: none"> <li>• We must rectify any inaccurate or incomplete information without undue delay and in any event within 1 month of receipt of your request;</li> <li>• If we have disclosed your personal information to others, we must (subject to certain exceptions) contact the recipients to inform them, that your personal information requires rectification.</li> </ul>

<b>A right to erasure</b>	<ul style="list-style-type: none"> <li>• This is a right to have your personal information deleted or removed.</li> <li>• This right only applies in certain circumstances (such as where we no longer need the personal information for the purposes for which it was collected).</li> <li>• We have the right to refuse to delete or remove your personal data in certain circumstances.</li> </ul>	<ul style="list-style-type: none"> <li>• If this right applies, we must delete or remove your personal information without undue delay and in any event within 1 month of receipt of your request;</li> <li>• If we have disclosed your personal information to others, we must (subject to certain exceptions) contact then recipients to inform them that your personal information must be erased.</li> </ul>
<b>A right to data portability</b>	<ul style="list-style-type: none"> <li>• This is a right to obtain and re-use your personal information for your own purposes;</li> <li>• It includes a right to ask that your personal information is transferred to another organisation (where technically feasible).</li> <li>• This right only applies in certain limited circumstances.</li> </ul>	<ul style="list-style-type: none"> <li>• If this right applies we must provide your personal information to you in a structured, commonly used and machine readable form</li> <li>• Again, we must act without undue delay and in any event within 1 month of receipt of your request;</li> <li>• We cannot charge you for this service.</li> </ul>
<b>A right to object</b>	<ul style="list-style-type: none"> <li>• This is a right to object to the use of your personal information.</li> <li>• The right applies in certain specific circumstances only.</li> <li>• You can use this right to challenge our</li> </ul>	<ul style="list-style-type: none"> <li>• If you object to us using your personal information for direct marketing, we must stop using your personal information in this way as soon as we receive your request.</li> <li>• If you object to other uses of your personal information, whether we</li> </ul>

	<p>use of your personal information based on our legitimate interests;</p> <ul style="list-style-type: none"> <li>You can also use this right to object to use of your personal information for direct marketing</li> </ul>	<p>have to stop using your personal information will depend on the particular circumstances.</p>
<b>A right to object to automated decision making</b>	<ul style="list-style-type: none"> <li>This is a right not to be subject to a decision which is made solely on the basis of automated processing of your personal information where the decision in question will have a legal impact on you or a similarly significant effect.</li> </ul>	<ul style="list-style-type: none"> <li>Where such a decision is made, you must be informed of that fact as soon as reasonably practicable;</li> <li>You then have 21 days from receipt of the notification to request that the decision is reconsidered or that a decision is made that is not based solely on automated processing;</li> <li>Your request must be complied with within 21 days.</li> </ul>
<b>A right to restrict processing</b>	<ul style="list-style-type: none"> <li>This is a right to 'block' or suppress processing of your personal information.</li> <li>This right applies in various circumstances, including where you contest the accuracy of your information).</li> </ul>	<ul style="list-style-type: none"> <li>If we are required to restrict our processing of your personal information we will be able to store it but not otherwise use it.</li> <li>We may only retain enough information about you to ensure that the restriction is respected in future.</li> <li>If we have disclosed your personal information to others, we must (subject to certain exceptions) contact them to tell them about the restriction on use.</li> </ul>

If you wish to exercise any of your rights, you can make a request to do so by contacting us using the details set out in this privacy notice.

If you request the exercise of any of your rights we are entitled to ask you to provide us with any information that may be necessary to confirm your identity.

## **YOUR RIGHT TO WITHDRAW CONSENT**

If you have given us your consent to use any of your personal information, you can withdraw your consent at any time. To do so, please contact us using the details set out in this privacy notice.

## **HOW CAN YOU GET IN TOUCH WITH US AND WHO IS OUR INFORMATION OFFICER?**

If you have any questions about this privacy notice, how we handle your personal information or if you wish to make a complaint, you can contact us in the following ways:

<b>Postal address</b>	Welsh Pony and Cob Society  Bronaeron  Felinfach  Lampeter  Ceredigion  SA48 8AG
<b>Email address</b>	gemma@wpcs.uk.com
<b>Phone number</b>	01570 471754

## **RIGHT TO COMPLAIN TO THE INFORMATION COMMISSIONER'S OFFICER**

If we are unable to deal with a complaint to your satisfaction or if you are unhappy with the way we are using your personal data, you also have the right to make a complaint at any time to the UK's supervisory authority for data protection issues, the Information Commissioner's Office.

## **CHANGES TO OUR PRIVACY NOTICE**

We may update this privacy notice from time to time. If we make any substantial updates, we will provide you with a new privacy notice. We may also notify you in other ways from time to time about the processing of your personal information.