



BRITISH DRESSAGE PRIVACY NOTICE FOR OUR MEMBERS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice explains how we comply with the law on data protection and what your rights are. For the purposes of data protection law, we will be the controller of your personal information.

This notice applies to you if you are:

1. an individual participant of dressage (to include ownership) who has registered his/her interest in participating in the sport competitively and/or whose details we have collected from one of our affiliated competitions, venues, events or other third-party referral;
2. a coach or technical official who has registered for membership to find out more about the training courses and accreditation services we offer; or
3. a fan, participant or supporter of dressage who has contacted us to purchase any of our online merchandise/products and/or signed up to receive updates (including associate membership) about upcoming events, offers and ways to get involved further with dressage.

References to **we**, **our** or **us** in this privacy notice are to British Dressage and British Dressage Trading Ltd. We are companies limited by guarantee, registered in England and Wales under company number 03443026 and 08712159 and we have our registered office and main trading address at Building 2020 Meriden Business Park, Copse Drive, Meriden, West Midlands CV5 9RG.

Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

1. **PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

When you contact us for any reason, including when you sign up for membership with us, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allow us to contact you directly such as name, title, marital status, email addresses, delivery/billing address and telephone numbers;
- date of birth;
- gender;
- membership details including your membership number, start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and record details of financial transactions with you;
- use of and movements through our online portal, to include passwords, personal identification numbers, IP addresses, usernames and other IT system identifying information which may include browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website and online portal;

- CCTV footage and other information obtained through electronic means such as swipe card and key fob records;
- records of your attendance at any events or competitions hosted by us to include date, time and location of attendance;
- images in video and/or photographic form and voice recordings; and
- your marketing preferences so that we know whether and how we should contact you.

Riders/Participants

If you are a rider/participant who has registered his/her interest in participating in the sport competitively, you may also provide us with, or we may obtain the following additional **personal information** from you:

- identification documents such as passport and identity cards;
- details of any club and/or county membership;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment, gradings or ratings, competition results, details regarding competitions attended and performance;
- any disciplinary and grievance information;
- any details required for the purposes of awarding scholarship funding or grants (including any means testing);
- professional equine qualifications;

Coaches, Judges and Officials

If you have registered with us to receive more information about our coaching/teaching accreditation/qualification scheme and/or any of our education and teaching programmes, you may also provide us with, or we may obtain the following additional **personal information** from you:

- any coaching code or official number;
- your current affiliated club or other organisation (if applicable);
- coaching/teaching qualification and/or officiating history and any player rating (if any);
- accreditation/qualification start and end date;
- identification documents such as passport, utility bills, identity cards, etc.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store, and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis. These include anti-doping in sport, standards of behaviour in sport, and safeguarding of children and individuals at risk;
- it is necessary for the purposes of archiving, research and/or statistics;

- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below, we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information which includes criminal offence data from you. For criminal records history, we process it with your explicit consent, where necessary in connection with legal claims or where necessary in relation to anti-doping in sport and/or to maintain standards of behaviour in sport.

3. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members when you create an account on our website or you visit our website at www.britishdressage.co.uk or apply in writing to become a member of British Dressage to purchase any services or products we offer or when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are a participant in dressage, we also may collect personal information about you from any venue, club, school or other organisation you are affiliated with or from other referrals such as from coaches or talent scouts.

We may also collect personal information about you when you sign up, purchase tickets or attend any events hosted by us.

As you interact with our website, we will automatically collect certain technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. For further details, please refer to our cookie policy at <https://www.britishdressage.co.uk/cookie-policy/>.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how and what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

4. **USES MADE OF THE INFORMATION**

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this. Most commonly, we will use your personal information in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you, for example, your membership with British Dressage;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, as detailed in the table below; or
- where we need to comply with a legal obligation.

Purpose	Personal information used	Lawful basis
<u>All Members</u>		
To administer any membership account(s) you have with us and managing our relationship with you, including arranging for any insurance and dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us.	This is necessary for our legitimate interests: (a) to enable us to properly manage and administer your membership contract with us; and (b) for our legitimate interests to recover any debts owed to us and so that we may keep up to date membership records.
To arrange and manage any contracts for the provision of any merchandise, products and/or services	All contact and membership details. Transaction and payment information.	This is necessary to enable us to properly administer and perform any contract with you for the provision of products, services or merchandise.
To send you information which is included within your membership benefits package, including members' handbook, members magazine, members newsletter, details about advanced ticket information, your insurance/legal cover, competitions and events, partner offers and discounts and any updates on dressage	All contact and membership details and your marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us. This is necessary for our legitimate interests to grow our membership and inform our marketing strategy.
To send you other marketing information we think you might find useful or which you have requested from us, including our promotional newsletters, information about membership, events, participation, products and information about our commercial partners	All contact details, membership details and marketing preferences.	Where you have given us your consent to do so.

To answer your queries or complaints	Contact details and records of your interactions with us.	We have a legitimate interest to provide responses to your queries and complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records.</p> <p>The condition for retaining special category and criminal offence data is for reasons of substantial public interest, for archiving purposes or where it is required in connection with legal claims.</p>
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership/competition structure is targeted and relevant.
For the purposes of promoting / reporting the sport, our events and membership packages. This includes the use of live streaming and on demand services.	Images in video and/or photographic form.	<p>We have a legitimate interest in promoting and recording the sport to raise awareness and to grow our membership.</p> <p>For those competitors under 18, appropriate consent will be obtained prior to making any recording or taking any images.</p> <p>Please note: Anyone over the age of 18 attending an event may have video footage recorded or their photograph taken for use as indicated. We do not rely on consent to take such images and recordings.</p>

		<p>However, all individuals have the option to confirm that they do not wish to have such images/recordings taken either at the venue, or prior to the event, by contacting us using the contact details provided below.</p> <p>For anyone under 18, a consent form will be issued for completion to allow the use.</p>
For the purposes of creating educational and training materials	Images in video and/or photographic form.	We have a legitimate interest in using the video footage and images taken at our competitions and events for the purposes of training our staff and coaches and officials
To enable third parties to report/promote the sport	Contact details.	Where you have given us your consent to do so.
To comply with health and safety requirements	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.
<u>Riders/participants</u>		
To administer, monitor and record your attendance at events and competitions	<p>All non-medical performance and attendance data.</p> <p>Details of any affiliated club membership/qualifications.</p>	This is necessary to enable us to register you on to and properly manage and administer your development through the sport.
To administer any drug and alcohol testing	Health and medical information	<p>This is necessary for our legitimate interests to ensure we promote and manage safe and fair events.</p> <p>We process special category personal data under the conditions of the “special category reasons for processing of your personal data” referred to in section 2 above, particularly to maintain anti-doping in sport. As a UK governing body British Dressage are subject to World Anti-Doping (WADA) rules, via the British Equestrian Federation.</p>

		This means UK Anti-Doping may undertake randomised tests at any BD events (although these are normally associated with world class / elite level rider and events).
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate, to provide appropriate adjustments to our sports facilities and to monitor and manage sickness absence	Health and medical information	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.</p> <p>We process special category personal data under the conditions of the “special category reasons for processing of your personal data” referred to in section 2 above, particularly to maintain standards of behaviour in sport, in connection with legal claims and, where required, with your explicit consent.</p>
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect including any disciplinary and grievance information.	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data under the conditions referred to in section 2 above, particularly those of a substantial public interest.</p> <p>Criminal records and offence data is processed in order to investigate allegations of, for example, animal cruelty or in connection with any safeguarding concerns.</p>
To conduct performance reviews, manage performance and determine performance requirements and administer your development and training requirements on any pathway programme	<p>All performance and attendance data and information about your health and medical condition.</p> <p>Details of any affiliated club membership/qualifications.</p>	<p>This is necessary to enable us to properly manage and administer your development through the performance programme.</p> <p>We process special category personal data under the conditions referred to in section 2 above, particularly with your explicit consent.</p>

<p>To make decisions about your progression and development through any pathway programme/qualification and to assist with the delivery of rankings, ratings and qualification</p>	<p>All performance and attendance data and information about your health.</p> <p>Details of any affiliated club membership.</p>	<p>This is necessary to enable us to properly manage and administer your development through the performance programme.</p> <p>We process special category personal data under the conditions referred to in section 2 above, particularly where required for reasons of substantial public interest.</p>
<p>To arrange for any trip or transportation to and from an event including international competitions</p>	<p>Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.</p>	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event.</p> <p>We process special category personal data under the conditions referred to in section 2 above, particularly with your explicit consent.</p>
<p>To assess your eligibility for and to provide any scholarship funding and/or grants</p>	<p>All details required for the purposes of awarding scholarship funding or grants (including any means testing)</p>	<p>This is necessary to enable us to properly administer and perform any contract for the provision of funding.</p>
<p>For the purposes of equal opportunities monitoring</p>	<p>Name, title, date of birth, gender, information about your race or ethnicity, health, and medical information and performance data</p>	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair, and accessible.</p> <p>We process special category personal data under the conditions referred to in section 2 above, in particular where required in connection with a substantial public interest.</p>
<p><u>Coaches and Officials</u></p>		
<p>To administer your attendance at any courses, training, events or programmes you sign up to</p>	<p>All contact and membership details, transaction, and payment data.</p> <p>Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history.</p>	<p>This is necessary to enable us to register you on to and properly manage and administer your development through the course and/or programme, in compliance with our contract with you.</p>

<p>To conduct performance reviews, managing performance and determining performance requirements</p>	<p>All performance and attendance data and information about your health.</p> <p>Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history.</p> <p>Qualification start and end dates.</p>	<p>This is necessary to enable us to properly manage and administer your development through the course and/or programme in compliance with our contract with you.</p> <p>We process special category personal data under the conditions referred to in section 2 above, particularly in maintaining standards of behaviour in sport.</p>
<p>To make decisions about your progression and accreditation status</p>	<p>As above.</p>	<p>As above.</p>
<p>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</p>	<p>Information about your criminal convictions and offences</p>	<p>For criminal records and offence data we process it where required for reasons of substantial public interest.</p>
<p>To administer any drug and alcohol testing</p>	<p>Health information</p>	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.</p> <p>We process special category personal data under the conditions referred to in section 2 above, in particular those of a substantial public interest.</p>
<p>To arrange for any trip or transportation to and from an event</p>	<p>Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health, and medical information.</p>	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event.</p> <p>We process special category personal data under the conditions referred to in section 2 above, normally with your explicit consent.</p>

To supply details for persons involved directly/indirectly with an event in an official capacity	Contact details, accreditation level	This is necessary for venues to secure the volunteers and officials required to run the competition/event. Listed individuals have the right to opt out.
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For some of your personal information you will have a legal, contractual, or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information, we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your position as a member. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

5. **DIRECT MARKETING**

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by emailing us at membership@britishdressage.co.uk. You can also unsubscribe from our email marketing by clicking on the unsubscribe link in the marketing messages we send to you.

6. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you.**
- **To any governing bodies, venues or regional bodies for the sports covered by us:** to allow them to properly administer the sports on a local, regional, and national level.
- **Other service providers:** for example, email marketing specialists, payment processors, data analysis CCTV contractors, promotional advisors, contractors or suppliers and IT services (including CRM, website, video, and teleconference services). We also contract with a third party live streaming and on demand provider;
- **Our supply chain partners and sub-contractors,** such as mailing house, electronic voting, couriers, import/export agents, shippers;

- **Our Commercial Partners/Sponsors:** for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners as part of your membership package;
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.
- **Our trainee judges and officials** where access to video footage and images is required for training purposes.

We do not disclose personal information to anyone else except as set out above.

7. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY (This information is included for individuals resident in the UK and the EU)**

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Economic Area (EEA). Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure.

Whenever we transfer your personal data out of the UK and the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

For further details please contact us by using the details set out in the "**Contacting us**" section below.

8. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of six years after your last contact with us.

Exceptions to this rule are:

- CCTV records which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime;
- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked for us;

- Competition results information may be retained for longer periods for research and statistical purposes and where required to assist in determining eligibility to compete at certain events.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

You may be able to update some of the personal information we hold about you through our online membership portal under your account. Alternatively, you can contact us using by using the details set out in the "**Contacting us**" section below.

9. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION** **(This information is included for individuals resident in the UK and the EU).**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

10. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

11. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email office@britishdressage.co.uk or write to us at: British Dressage, Building 2020, Copse Drive, Meriden Business Park, Meriden, West Midlands, CV5 9RG.

Version dated November 2022