

ONLINE SERVICES PRIVACY NOTICE EVENTING IRELAND

This Privacy Notice provides information about the ways in which Eventing Ireland collects, processes and stores the personal data provided through the use of our online services. This Notice is meant as a summary only, our long form Data Protection Policy is available upon request with further information on our processing.

Our registered address is Beech House, Millennium Park, Osberstown, Naas, Co. Kildare, Ireland. You can contact us by email at alison@eventingireland.com or by telephone on +353 (0)83 020 0414. Our Company Registration Number is 2486.

Personal data we collect

We collect certain personal data when you:

- · register to use our services
- sign up for membership
- · upload documentation electronically
- avail of our services provided
- · contact us via our website

We will collect some or all of the following information depending on your use of our online platforms:

 name, address, date of birth, email, telephone numbers, club details, grading information, health information (where applicable), ID verification documentation, photo, device details, location data.

Principles of Processing Personal Data

All data processed by us is done so in line with the principles of data processing, these are:

- **lawfulness, fairness and transparency** we will always process data lawfully and we will be clear, open and honest about how the data is used.
- **purpose limitation** we will only use personal data in line with the services on our website, data will not be used for further purposes.
- data minimisation we will only collect the minimum amount of data required to carry out our services.
- accuracy we will ensure that we record data accurately.
- **storage limitation** we apply retention periods to the data received.
- **integrity and confidentiality** we have appropriate technical and organisational measures in place to protect all data collected, processed and stored by us.
- accountability as a Data Controller we are responsible for and will be able to demonstrate compliance with the above principles.

What is our legal basis for using your personal data?

We must have a legal basis for using your personal data, these are as follows:

- Performance of a contract during membership application process and when you become a member, we must collect certain data to provide our services.
- Legitimate interests we sometimes collect and use your personal data because we have a legitimate reason to use it, and this is reasonable when balanced against your right to privacy. Eg. when inquiring about or registering for events.

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Consent – we rely on your consent for certain processes such as when you indicate that you
consent to receive marketing information.

How do we use your personal data?

We will use your personal data for some or all of the following, depending on your use of our online services:

- To process your membership details
- Administering your membership and the services we provide to you,
- Verifying your identity and the information you provide to us,
- Facilitating the provision of additional services, such as competition entry,
- Assessing how we can improve the products and services we provide to you with and future services which may be of interest,
- For providing updates about our services by way of our newsletter unless you have opted out of receiving such communications,
- Obtaining information about your general use of our website.

How do we protect your personal data?

We use a variety of physical and technical measures to keep your personal data safe and prevent any unauthorised access or disclosure. Electronic data and databases are stored on secure computer systems with control over access to information using both physical and electronic means. Our staff receive data protection and information security training. We have policies in place which staff are required to follow when they handle your personal data.

How long will we keep your personal data?

We will generally keep your personal data for seven years after our relationship with you ends or such period as may be required by applicable laws. We may keep your personal data for longer because of a potential or ongoing investigation or another legal reason.

Do we share your personal data with anyone?

Data Sharing

We may share your personal data as required with affiliated bodies (eg: HSI).

We may also share your information with third party agents or subcontractors who work on our behalf and provide us with expertise or assistance in such areas as legal, accounting, IT or insurance. We have contracts in place with these agents or subcontracts to ensure the protection and security of your personal data.

Where we outsource the processing of personal data, we do so under a Data Processing Agreement.

Data Transfers

At present, the only personal information that we transfer outside the EEA is an email address and this is done through the use of Mail Chimp or Brevo in order to circulate our newsletter. We have received a copy of Mail Chimp's Data Processing Addendum which governs the sharing of data between Eventing Ireland in the EU and Mail Chimp in the US. Additionally, Mail Chimp, as part of the Intuit Group have signed up the EU-US Data Privacy Framework

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(https://www.dataprivacyframework.gov/s/participant-search/participant-

<u>detail?id=a2zt000000TXVKAA4&status=Active</u>). This means that the data sharing is covered under the Adequacy Agreement between the European Commission and the US. Brevo's privacy policy can be found

https://www.brevo.com/legal/privacypolicy/#:~:text=Brevo%20implements%20guarantees%20ensuring%20the,of%20the%20Users%20of%20Brevo.

Your privacy rights

You have a number of rights regarding the processing of your personal data, these are:

- You have the right to be told about how we use your personal data and for copies of any data we hold in relation to you.
- You can ask us to correct your personal data if you think it's wrong.
- · You can ask us to delete your personal data.
- · You can object to us processing your personal data for marketing purposes.
- You can object to us processing other personal data (if we are using it for legitimate interests)
- You can ask us to restrict how we use your personal data.
- You can ask us to transfer personal data to you.
- You can ask us to carry out a human review of an automated decision we make about you.
 Please note: we do not use any automated decision making at present so this right is not applicable.

Please note that the above rights are not absolute, and some restrictions and limitations may apply.

You also have the right to lodge a complaint with the relevant supervisory authority, which in Ireland is, the Data Protection Commission, info@dataprotection.ie.

Cookies

What Are Cookies

Cookies are small files that store information on your hard drive or browser that means that the website can recognise that you have visited the website before. They make it easier for you to maintain your preferences on the website, and by seeing how you use the website we can tailor the website around your preferences and measure usability of the website.

What Do We Use Cookies For

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration, to help us provide a better service; to record session information and/or to assist you in browsing the website. This may in some instances only be statistical data about how you browse our website. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the Cookie to you.

For the same reason, we may obtain information about your usage of the website by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. Cookies help us to improve the website and to deliver a better and more personalised service. They enable us:

- to estimate usage numbers and patterns;
- to store information about your preferences, and so allow us to customise the website according to your individual interests;
- to speed up your searches; and
- to recognise you when you return to the website.

We do not currently use any analytics on our website.

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Managing Cookies Usage

You may refuse to accept, or you may disable cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of the website or unable to avail of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the website.

You can find out how to do this for your particular browser by clicking "help" on your browser's menu or by visiting www.allaboutcookies.org.

If you have any concerns about material which appears on the website, please contact us.

External Links

Any external links to other websites are clearly identifiable as such and Eventing Ireland (EI) is not responsible for the content or the privacy statements of these websites. If you have any issues or queries relating to such websites, please contact the providers directly.

Updates to our privacy notice and contact

We may update our Privacy Notice from time to time. If we modify our Privacy Notice, we will publish the revised version on our website.

If you have any questions, concerns or suggestions related to our Privacy Notice, you can contact us by emailing <u>alison@eventingireland.com</u>.

Updated November 2023.