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## **General Data Protection Regulation (GDPR) – Privacy Policy**

### **INTRODUCTION**

This Privacy Notice is effective from 25 May 2018 and explains the personal data that we collect from you and how we use your information.

Comann Each nan Eilean (CEnE) - The Eriskay Pony Purebred Studbook Society is the data controller (referred to as “we”, “us” or “our” in this privacy notice) and we are responsible for your personal data. Everything that we do with your data – for example storing it, working with it or deleting it – is referred to as processing.

The General Data Protection Act controls how your personal information is used by organisations, businesses and the Government. Everyone responsible for using data must make sure the information is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- handled according to people's data protection rights
- kept safe and secure
- not transferred outside the European Economic Area without adequate protection

CEnE is committed to protecting and respecting your privacy. This document explains when and why we collect personal information, how we process it, the conditions under which we may disclose it to others and how we keep it secure.

### **HOW DO WE COLLECT INFORMATION FROM YOU?**

We collect data from you through a variety of different methods including:

- Direct interactions: You may provide data by filling in forms, by communicating with us by post, phone, email, our Facebook pages or otherwise.
- As a Passport Issuing Organisation (PIO), we obtain information about you when you apply for a horse passport or when you lodge an existing horse passport with us.

### **WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?**

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Personal data means any/all information capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as follows:

- Identity and Contact Data.

If you apply for a horse passport or when you lodge an existing horse passport with us as a PIO, we collect your personal data as required by Article 38(1) of EU Regulation 2015/262. Other, non-personal, data will also be collected as part of the equine passport application process, as required by Article 38(1) of EU Regulation 2015/262.

## **SENSITIVE DATA**

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

## **HOW IS YOUR INFORMATION USED?**

We will only use your personal data when legally permitted, where it is necessary for our legitimate interests (or those of an official third party) and where we need to comply with a legal or regulatory obligation. This may include but is not exhaustive:

- carrying out our obligations arising from any contracts entered into by you and us.
- business as a Passport Issuing Organisation (PIO);
- business as a breed organisation
- dealing with entries into a competition
- seeking your views or comments
- notifying you of changes to our services
- sending you communications as part of your ownership benefits.
- In some cases, we process your personal data because you have given your consent. For example, when you contact us and ask for help or information.
- where the processing is necessary for legal reasons

## **DISCLOSURES OF YOUR PERSONAL DATA**

Who has access to your information?

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We do not sell or rent your information to third parties but we must by law share your personal data as follows:

Basic information supplied in connection with your application will be passed by CEnE to the Scottish Equine Database (SED) and the Central Equine Database (CED). Passport Issuing Organisations are required by law to supply this information to the Scottish Equine Database (SED) and the Central Equine Database (CED).

The minimum information required is: - Passport Identification Number, name of horse, date of registration, microchip number, date or year of birth, date or year of death, breed, sex, colour, owner details (title; first Name; last Name; address; postcode), country of birth, date of first ownership, date of passport issue. Other information such as internal organisation reference number, ancestry & keeper details may also be passed to SED/CED. The information will enable SED/CED to carry out its responsibilities regarding the implementation of horse passport requirements. SED/CED will be the data controller for the mandatory information which will be processed for SED/CED as required. The data collected for this purpose will be relevant and not excessive.

#### **DATA SECURITY**

All personal data you provide to us will be stored securely, both physically and electronically, in accordance with our policies. We have an information security process in place to oversee the effective and secure processing of your personal data and to prevent your personal data from being accidentally lost, used, altered, disclosed or accessed in an unauthorised way,

#### **DATA RETENTION**

We review our retention periods for personal information on a regular basis. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. We have a legal obligation to hold/process your personal data to comply with the law. Under the Scottish Government Minimum Operating Standards for Passport Issuing Organisations- PIO's (November 2015) the current regulations require that PIO records must be kept for a minimum of 35 years or a minimum of two years from the death of the recorded animal.

#### **STOLEN OR STRAYING EQUINES**

We might need to contact you if we are informed an equine registered in your name has been stolen or strayed. This process is necessary for ours and/or the legitimate interests of a third party and or for us to perform a task in the public interest.

#### **YOUR LEGAL RIGHTS**

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Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data subject to our legal obligations
- Request restriction of processing your personal data
- Right to withdraw consent
- Right to be forgotten

You can see more about these rights at:

We will respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. To ensure that such information is provided to the correct person, we will require proof of identity such as a copy of a recent utility bill or bank statement, copy of passport or driving licence.

## **WEBSITE & SOCIAL MEDIA**

We do not collect or store information about you and your browsing habits through our website or social media. The internet is not a 100% secure medium for communication and accordingly, we cannot guarantee the security of information you send to us via the internet. We are not responsible for any damages you or others may suffer as a result of the loss of confidentiality of such information.

## **THIRD-PARTY LINKS**

Our website may include links to third-party websites. Clicking on those links/enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements and subsequent use of your data even if you access them using links from our website. This privacy policy does not cover links to external sites.

## **MINORS**

We are committed to protect the privacy of children under the age 16. For those aged under 16, parent/guardian's permission beforehand is required before we accept information from a minor.

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## **RIGHT TO COMPLAIN**

If you are not satisfied with the processing of your personal data you should contact us via email or post in the first instance. If we do not resolve your complaint you also have the right to complain to the supervisory authority if you consider that the we are in breach of your data protection rights. The supervisory authority is the Information Commissioner's Office, Head Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. or the Scottish Regional office at:

Information Commissioner's Office  
45 Melville Street  
Edinburgh  
EH3 7HL

Tel: 0303 123 1115

Email: [scotland@ico.org.uk](mailto:scotland@ico.org.uk)

## **OVERVIEW**

Comann Each nan Eilean – The Eriskay Pony Purebred Studbook will not disclose information regarding its owners/keepers to any third party in the day to day running of its business unless requested to do so by SED/CED, local authorities, police and other enforcement bodies. Any questions regarding Data Protection and the way it is used by CEnE should be directed to our Registered Office.

If personal information is requested by any party other than official authorities, we will contact the person whose details are being requested, ask permission for that information (usually address and/or telephone number) to be released and act according to the answer given.

## **Review of this Policy**

We keep this Policy under regular review & from time to time we may need to make changes to it, for example, as a result of Scottish Government legislation or other changes in data protection laws. For these reasons, you should check our website periodically.

Contact us by email at or tel: 01878 720 214

Incorporated by Companies House as Ltd Company No: SC211209

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