Keeping your personal information safe is very important to us. We are committed to complying with privacy and data protection laws and being transparent about how we process personal data. This privacy policy relates to our use of any personal information we process about you.

**How we collect personal data**

We may collect your personal data in different ways, for example:

* when you join as a member
* when you, your parent or guardian communicate with us by post, telephone, SMS, email, Facebook or via our website
* as you interact with us in other ways; as a contractor, or in any other capacity

**How we use personal information**

We collect and use personal information about our members, supporters and volunteers for different purposes. We only collect personal information that we genuinely need.

This may include:

* Contact details such as name, address, email address and phone numbers
* Date of birth and gender
* Qualifications
* Insurance details
* Name of your parent or guardian (if you are under 18)

**Membership applications, administration and renewals**

We will use the information that you provide to us to process your membership application and renew your application if appropriate.

It should be noted that as we are affiliated to the Association of Irish Riding Clubs CLG, your personal information will be shared with them in order to register you as a member and to fulfil your AIRC member benefits/services and they may share with associates for the purpose of fulfilling your full membership benefits/services (i.e. insurance providers). The AIRC is a separate data controller for its own purposes in this regard.

Your information will also be processed in the day to day running of the club such as:

* processing of membership forms and payments;
* sharing data with committee members to provide information about club activities,
* membership renewals or invitation to social events;
* providing you notice of general meetings
* club newsletter and/or mailing list promoting club activity; and
* publishing achievements and competition results on our social media platforms

Our legal basis for using your personal information in this way is for the performance of a contract.

**Provision of training to individuals**

If you sign up to one of our information talks, training courses, clinics etc., we will use the information that you provide to us to process your registration and provide the training to you. Our legal basis for using your personal information in this way is for the performance of a contract.

**Entering competitions / competition results**

If you register for one of our competitions, we will use your information provided to us to process your registration and enable you to attend the competitions. This will include sharing some of your information with our volunteers that run the events, judges and safety stewards. Our legal basis for using your personal information in this way is for the performance of a contract.

All competition results will be published online and in national newspapers, and where appropriate share with AIRC or Horse Sport Ireland – this may also include photographs. Our legal basis for using information for this purpose is to fulfil our legitimate interest.

**Payment for services**

If you pay for one of our services (i.e. competition entry or to partake in a clinic) on our website, we will use your information you provide to fulfil your purchase. Our legal basis for using your personal information for this purpose is for the performance of a contract.

We use [insert service providers i.e. Itsplainsailing, paypal, stripe] to process payments - please note that they have their own privacy policies and that we do not accept any responsibility or liability for these policies

We may share relevant information with our necessary parties to fulfil your purchase.

**Dealing with complaints and appeals**

If a complaint or an appeal is raised with us, we will process the personal information that is provided to us to manage and resolve the complaint or appeal. This may include sharing relevant information with other members or organisations such as AIRC, HSI, depending upon the nature of the complaint and the area it relates to. Our legal basis for using personal information for this purpose is to fulfil our legitimate interest.

**Undertaking governance**

We process relevant personal information about existing and potential members and committee members for governance purposes, including minute taking. All committee and members meetings are minuted and shared with members where appropriate. This information may also be shared with other parties such as the AIRC and HSI. Our legal basis for this processing for this purpose is to fulfil our legitimate interest.

**Undertaking safeguarding activities including garda vetting**

When necessary, we process relevant personal information about members, volunteers, coaches and employees for safeguarding purposes. This might include insurance information and undertaking garda vetting and other checks to identify any criminal and other activity we need to be aware of. It may be necessary to share some personal information with relevant authorities such as the Gardaí, AIRC and HSI. Our legal basis for this processing is to meet our legal obligations.

**Recording safety incidents and accidents**

We record and retain relevant personal information about accidents, incidents and near misses that are reported to us. Our legal basis for this processing is to fulfil our legitimate interest. It may be necessary to share this information with relevant authorities such as the HSE, Gardaí, AIRC and HSI.

**Carrying out surveys**

If you choose to take part in one of our surveys, we will use the personal information that you provide to process the results of the survey and undertake analysis. We will not share the personal information that you provide in a survey with any other organisations. Survey results will be anonymised before being shared or published to the wider membership, however the committee may see the results before they are anonymised. Our legal basis for using personal information for this purpose is to fulfil our legitimate interest.

**Processing expenses**

We will use your personal information including your bank account details to process expense claims. Our legal basis for using your information for this is for the performance of a contract.

**Social Media**

We have a [insert social media platforms here such as Facebook page, WhatsApp groups and Viber groups]. If you join one of the social media platforms, please note that provider of the social media platforms have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on social media pages

**Collection and use of technical information (for use if the club has a website – delete otherwise)**

This website [insert web address] uses temporary “session” cookies which enable a visitor’s web browser to remember which pages on this website have already been visited. No other information is stored in this cookie. Visitors can use this website with no loss of functionality if cookies are disabled from the web browser. Technical details in connection with visits to this website are logged by our internet service provider for our statistical purposes. No information is collected that could be used by us to personally identify website visitors. The technical details logged are confined to the following items:

* the IP address of the visitor’s web server
* the top-level domain name used (for example .ie, .com, .org, .net)
* the previous website address from which the visitor reached us, including any search terms used
* Google analytics which shows the traffic of visitors around this web site (for example pages accessed and documents downloaded)
* the type of web browser and operating system used by the website visitor.

We will make no attempt to identify individual visitors, or to associate the technical details listed above with any individual. It is our policy never to disclose such technical information in respect of individual website visitors to any third party (apart from our internet service provider, which records such data on our behalf and which is bound by confidentiality provisions in this regard), unless obliged to disclose such information by law. The technical information will be used only by us, and only for statistical and other administrative purposes.

**Third Party Websites**

This privacy policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website to which this website contains a link. The inclusion of a link on the website does not imply endorsement of the linked website by us.

Additionally, we may provide you with access to third-party functionality that permits you to post content to your social media account(s). Please note that any information that you provide through use of this functionality is governed by the applicable third party’s privacy policy, and not by this privacy policy, and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

**Sharing personal information**

We will only share your personal information where we are required to fulfil our contract with you, or legitimate interest, where we have your consent, or we are required to do so by law.

* We may share your personal information with third party organisations that will process it on our behalf, for example a mailing house, our website administrator or printers.
* If necessary, we may also share your information with the AIRC, HSI, course providers, judges, and coaches.
* We may also share your information with our bank to process a payment; our professional advisers (such as our legal advisers) where it is necessary to obtain their advice; and our IT support and data storage providers.

Where required, we will process personal information to comply with our legal obligations. In this respect we may use your personal data to comply with subject access requests; tax legislation; for the prevention and detection of crime; and to assist the Gardaí and other competent authorities with investigations including criminal and safeguarding investigations.

**Transferring personal data outside of the EEA**

We do not send information outside of the EEA.

**Your rights**

You have the following rights, in certain circumstances and subject to applicable exemptions, in relation to your personal data:

* the right to access the personal data that we hold about you, together with other information about our processing of that personal data;
* the right to require us to rectify any inaccuracies in your personal data;
* the right to require us to erase your personal data;
* the right to request that we no longer process your personal data for particular purposes;
* where the legal basis for processing is consent, the right to withdraw your consent at any time;
* the right to object to our use of your personal data or the way in which we process it; and
* where the legal basis for processing is consent or that it is necessary for the performance of a contract with you, the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller.

In order to exercise any of the rights set out above, please contact [Insert clubmail email address here i.e. clubname@airc.ie]

As a data subject you are not obliged to share your personal data with us. If you choose not to share your personal data with us we may not be able to register or administer your membership and this will result in the termination of your membership.

**How long we keep your personal information**

We will hold your personal information for as long as is necessary. We will not retain your personal information if it is no longer required. In some circumstances, we may legally be required to retain your personal information, for example for finance, employment or audit purposes.

* We will keep membership records indefinitely, in order to administer and manage on-going entitlement to membership and event entry. [Ensure this matches with your data sharing agreement with AIRC]
* We will keep records of competitions a minimum of 2 years, in order to facilitate any insurance claim resulting from the activity.
* We will keep volunteer records indefinitely, in order to administer and manage on-going activities/work our volunteers are engaged in.
* We will keep fundraising and donation records for 7 years, in order to comply with our legal obligations. [Delete if not required]
* We will keep complaints records indefinitely, in order to administer and manage on going complaints for future reference and to help to make informed decisions around safeguarding or welfare issues, as is relevant.
* We will keep meeting general minutes indefinitely, in order to administer the ongoing business.
* We will keep committee and member meeting minutes indefinitely, in order to administer the ongoing business.
* We will keep Safeguarding records indefinitely, in order to comply with legal obligations.
* We will keep Safety/accident records indefinitely, in order to administer and manage the ongoing activities/work we are engaged in.

**Changes to this policy**

This Privacy Policy may change from time to time. Where practical we will provide you with an updated Privacy Policy from time to time. However, we also recommend that you please visit www.airc.ie/privacy periodically to keep up-to-date with the changes to our club Privacy Policy.

**Making a complaint to the Data Protection Commissioner**

If you think your data rights have been breached, you are able to raise a complaint with the Office of the Data Protection Commissioner.

You can contact the ODPC at Data Protection Commissioner, Canal House, Station Road, Portarlington, R32 AP23, Co. Laois or by telephone on +353 57 8684800 or +353 (0)761 104 800 or Lo Call 1890 252 231 or email info@dataprotection.ie