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GDPR AND DATA PROTECTION POLICY

Kimblewick Equestrian Centre (Norfolk) LTD

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Policy Owner: Nikkita Gostling

1. PURPOSE

We take the protection of personal information seriously and comply with applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy explains how we collect, store, use and protect personal information belonging to our customers, riders, staff and other individuals.

2. WHAT PERSONAL DATA WE HOLD

Depending on the services we provide, we may hold information such as:

- Names and contact details;
- Addresses;
- Emergency contact details;
- Rider information;
- Booking and lesson information;
- Payment and invoicing information;
- Information provided by customers when using our services;
- Information relating to staff and contractors; and
- Other information necessary to provide our services.
- School documents ie EHCP, care plans, Risk assessments

We only collect information that is reasonably necessary for our business purposes.

3. WHERE WE STORE PERSONAL DATA

We use secure third-party systems to help us operate our business.

Our main systems include:



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3.1 Google Drive / Google Workspace

We use Google Drive to store business documents and files which may contain personal information.

Access is restricted to authorised users. We use appropriate account security measures, including passwords and, where available and appropriate, multi-factor authentication and access controls.

Google provides data-processing terms and security measures for Google Workspace services. We will review Google's current privacy and data-processing arrangements as part of our supplier checks.

3.2 EC Pro

We use EC Pro to manage rider records, bookings and related equestrian business information.

Access to EC Pro is restricted to authorised users.

We will review EC Pro's privacy and data-processing information to ensure that appropriate safeguards are in place for the personal information we hold within the system.

4. DATA HOSTING AND INTERNATIONAL TRANSFERS

Our business uses cloud-based services, including Google Drive and EC Pro.

We will take reasonable steps to establish where personal data is stored and processed by these providers and whether any personal data is transferred or made accessible outside the United Kingdom.

We do not intentionally transfer personal data overseas as part of our normal business activities.

If a supplier informs us that personal data will be transferred outside the UK, we will review the arrangement and ensure that appropriate UK GDPR safeguards are in place before the transfer takes place.

We will not rely solely on the fact that a supplier is a well-known company or cloud provider as evidence of GDPR compliance.

5. SECURITY OF PERSONAL DATA

We take reasonable technical and organisational measures to protect personal information.

These measures include, where appropriate:

- Password-protected accounts;
- Restricted access to personal information;
- Access only for people who need the information;
- Multi-factor authentication where available;

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- Secure cloud services;
- Encryption provided by our service providers;
- Regular review of access permissions;
- Secure deletion of information when it is no longer required; and
- Keeping software and systems appropriately maintained.

6. ENCRYPTION

Where supported by our systems, personal data is protected using encryption.

We expect personal data to be protected:

In transit: when information is being sent between systems.

At rest: when information is stored within the system.

The security and encryption arrangements of our third-party service providers will be considered as part of our supplier reviews.

7. SECURITY STANDARDS AND CERTIFICATIONS

Where appropriate, we will consider the security certifications and standards held by our suppliers.

These may include standards such as:

- ISO 27001;
- Cyber Essentials;
- Cyber Essentials Plus; or
- Other recognised security standards.

We understand that having a security certification does not automatically mean that a supplier is GDPR compliant. We will consider the supplier's overall security and data-protection arrangements.

8. YOUR DATA PROTECTION RIGHTS

Individuals have rights under the UK GDPR, subject to applicable conditions.

These include:

- The right to be informed;
- The right to access personal information;
- The right to request correction of inaccurate information;

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- The right to request deletion in certain circumstances;
- The right to request restriction of processing;
- The right to data portability in certain circumstances;
- The right to object to certain processing; and
- Rights relating to certain automated decision-making and profiling.

Anyone wishing to exercise their rights should contact:

Data Protection Contact: Nikkita Gostling

Email: nikkita@kimblewick.co.uk

Telephone: 07856266990

We will respond to requests within the applicable legal timeframe.

9. HOW LONG WE KEEP PERSONAL DATA

We only keep personal information for as long as we reasonably need it.

The length of time information is retained depends on:

- Why we collected it;
- Legal or regulatory requirements;
- Accounting requirements;
- Our business needs; and
- Whether the information is still required to provide our services.

When information is no longer required, we will securely delete or dispose of it where appropriate.

Information stored within Google Drive and EC Pro will be reviewed as part of our normal data-retention arrangements.

10. DATA PROTECTION OFFICER

We will appoint a Data Protection Officer where we are legally required to do so.

Where a formal Data Protection Officer is not required, responsibility for data protection will be managed by:

Data Protection Contact: Nikkita Gostling

Email: nikkita@kimblewick.co.uk

Telephone: 07856266990

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11. SHARING PERSONAL DATA

We do not sell personal information.

We may share personal information with trusted third parties where this is necessary to operate our business or where we are legally required to do so.

This may include:

- Google / Google Workspace;
- EC Pro;
- Accountants;
- Payment providers;
- IT or technical support providers;
- Professional advisers;
- Government bodies or regulators where legally required; and
- Other service providers where necessary.

Where we use a third party to process personal information on our behalf, we will take reasonable steps to ensure that appropriate data-protection and security arrangements are in place.

12. DATA BREACHES

If we become aware of a personal-data breach, we will investigate the incident and take appropriate steps to contain and resolve it.

Where required by law, we will notify the Information Commissioner's Office (ICO) and/or affected individuals.

Examples of a data breach include:

- Personal information being sent to the wrong person;
- Loss or theft of a device containing personal information;
- Unauthorised access to an account;
- Unauthorised disclosure of personal information; or
- Accidental deletion or loss of personal information.

Any suspected data breach should be reported immediately to:

Data Protection Contact: Nikkita Gostling

13. PRIVACY NOTICE

We will maintain a Privacy Notice explaining how we collect, use and protect personal information.

The Privacy Notice will explain, where applicable:

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- What information we collect;
 - Why we collect it;
 - How we use it;
 - Who we share it with;
 - How long we keep it;
 - Individual rights; and
 - How individuals can contact us about their personal information.
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14. SUPPLIERS

Before using a supplier to process significant amounts of personal information, we will consider the supplier's:

- Privacy policy;
- Data-processing arrangements;
- Security measures;
- Data storage arrangements;
- Use of third parties or subprocessors;
- Data retention arrangements; and
- International data-transfer arrangements, where applicable.

We will keep appropriate records of the suppliers we use to process personal data.

15. REVIEW OF THIS POLICY

This policy will be reviewed at least annually and whenever there is a significant change to:

- Our systems;
 - Our suppliers;
 - The personal information we process;
 - Data-protection legislation; or
 - The way we store or process personal information.
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16. DECLARATION

We are committed to protecting personal information and complying with applicable UK data-protection legislation.

We will take reasonable and proportionate steps to ensure that personal information is collected, stored, used and shared securely and lawfully.