# Society of Master Saddlers Privacy Policy

The Society of Master Saddlers (UK) Ltd (SMS) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you should you should you enter into a working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

The SMS is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice so that you are aware of how and why we are using such information.

# **Data Protection principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

- 1. Used lawfully, fairly and in a transparent way.
- 2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3. Relevant to the purposes we have told you about and limited only to those purposes.
- 4. Accurate and kept up to date.
- 5. Kept only as long as necessary for the purposes we have told you about.
- 6. Kept securely.

# The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect, store, and use the following categories of personal information about you. (You may come under one or more of the categories listed below.)

# <u>Members</u>

The Society will collect information that it believes to be relevant and required to understand the member's needs, define its relationship with the Society and to comply with legislation:

- Personal contact details such as name, title, address, telephone numbers and personal email address
- Qualifications
- Business Services
- Payment details including credit or debit card information or bank account details.

#### **Course and Event Applicants**

- Personal contact details such as name, title, address, telephone numbers and personal email address
- Payment details including credit or debit card information or bank account details.
- Dietary requirements
- Previous qualifications
- Any relevant physical/medical conditions
- Photograph in respect of Qualified Saddle Fitter Course delegates

# City & Guilds Assessment Candidates

- Personal contact details such as name, title, address, telephone numbers and personal email address
- Gender
- Date of Birth
- Payment details including credit or debit card information or bank account details.
- Any relevant physical/medical conditions
- City & Guilds Enrolment Number

#### **General Enquiries**

 Personal contact details such as name, title, address, telephone numbers and personal email address

# Any person seeking arbitration in a dispute with a member

- Personal contact details such as name, title, address, telephone numbers and personal email address
- Any relevant physical/medical conditions

#### Any person making a payment to or receiving payment from the Society

- Personal contact details such as name, title, address, telephone numbers and personal email address
- Payment details including credit or debit card information or bank account details.

#### How is your personal information collected?

We collect personal information about members and customers from application forms, messages, emails, texts or phone calls and face-to-face provided by yourself or your representatives.

# How we will use information about you

We need all the categories of information in the list above (see: The kind of information we hold about you) primarily to allow us to perform our contact with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

Some of the grounds for processing will overlap and there may be several groups, which justify our use of your personal information.

#### **Members**

- To perform the contract we have entered into with you;
- Contacting you in relation to your contract or other things of potential interest to you;
- Making decisions to fulfill our contract with you;
- Membership administration;
- listing on SMS web site and Members Lists in printed form;
- Recording of Continuing Professional Development points
- Sending:
  - SMS and industry news, marketing and updates;
  - information on products;
  - o information on regulations and recommended policies;
  - event and course invitations and administration;
- When making an order with a manufacture or supplier;
- Where we need to comply with a legal obligation;
- 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.

# Your contact information may be shared with third parties for the purposes of;

- o promoting your business as an SMS member;
- marketing relevant to the saddlery industry;
- o providing member benefits;
- o placing an order;
- o contact with Trading Standards in the case of a dispute.

# Third party service providers are likely to be the following organisations:

- The Worshipful Company of Saddlers;
- City & Guilds;
- The Saddlery Training Centre, Salisbury or another Companies involved in relevant training, registration, qualification, certification and other related areas;
- SMS Trade Members;
- SMS printing service providers;
- SMS Press and Marketing providers;
- SMS Legal Helpline;
- Yellow Pages;
- Trade publications;
- Watson Equestrian Directory.
- Courier company or Royal Mail;
- Trading standards

#### **Course and Event Applicants**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- To perform the contract we have entered into with you;
- Contacting you in relation to your contract or other things of potential interest to you;
- Making decisions to fulfill our contract with you;
- Course / event administration;
- To record Continued Professional Development;

- Marketing of other relevant events / courses;
- Third parties may be contacted to confirm eligibility to attend under a listed professional body's membership;
- Where we need to comply with a legal obligation;
- 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.

#### Data will be shared with:

- Officers, directors or representatives of the Society in the process of course arrangements;
- Relevant professional organisations;
- Course lecturers;
- Course venue administrators.

# City & Guilds Assessment Candidates

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- To perform the contract we have entered into with you;
- Contacting you in relation to your contract or other things of potential interest to you;
- Making decisions to fulfill our contract with you;
- To carry out the necessary administration of the examination process;
- Where we need to register or apply for Qualifications that you are undergoing training or assessment for;
- to record results and CPD for future reference by The Society of Master Saddlers;
- Where we need to comply with a legal obligation.

#### Data will be shared with:

- The Saddlery Training Centre Salisbury;
- Other SMS recognised training centres;
- SMS assessors in the examination process;
- The Saddlers' Company and City & Guilds for the purposes of learning, assessment, registration and certification. (Please go to the City & Guild's learner privacy notice at www.cityandguilds.com/learner-policy for further information);
- Data may also be shared with the Saddlers' Company (and by extension with City & Guilds) in the event of a request for a reasonable adjustment, or in the course of an investigation, appeal or complaint.

# **General Enquiries**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Contacting you in relation to your enquiry or other things of potential interest to you;
- Making decisions to answer your query;
- Where we need to comply with a legal obligation.

#### Data will be shared with:

Officers, directors or representatives of the Society to gain advice on the issue raised.

# Any person seeking arbitration in a dispute with a member

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Contacting you in relation to your dispute;
- Making decisions to assist with the dispute;
- Arranging a second opinion;
- Where we need to comply with a legal obligation.

# Data will be shared with:

- Officers, directors or representatives of the Society to gain advice on the issue raised;
- An SMS representative enlisted to carry out a second opinion;
- The SMS member with whom you have a dispute;
- Trading Standards or Citizens Advice.

# Any person making a payment to or receiving payment from the Society

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- To perform the contract we have entered into with you;
- Contacting you in relation to your contract or other things of potential interest to you;
- Making decisions to fulfill our contract with you;
- Where we need to comply with a legal obligation.

#### Data will be shared with:

- The Society's book-keeper;
- The Society's Accountant;
- Credit card payment provider if applicable;
- Courier company or Royal Mail.

# **Data Retention**

#### How long will your information be kept for?

We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying and legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once our contract with you is complete we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

# Information will be retained under specific headings as follows:

#### **Members**

Digital and hard copy information will be held for the duration of your membership. Historical contact details are retained in printed Year Books and Members' List in the Society's archives and will have been distributed to the riding public and fellow members.

# **Course and Event Applicants**

Full details supplied will be held until the relevant course has been completed and administration finalised or until the applicant informs the Society that they no longer wish to remain on a waiting list. Thereafter the name, company and qualifications of delegates who complete a course will be retained in perpetuity for future reference in regard to ongoing training / membership eligibility. If requested, contact information will be retained in order to inform delegates of future training courses.

#### City & Guilds Assessment Candidates

Full details supplied will be held until the relevant examination has been completed and administration finalised. Thereafter the candidate's name, enrolment number and qualifications will be retained for future reference in regard to ongoing assessment and membership eligibility.

#### Any person making a payment to or receiving payment from the Society

Information will be held by the Society for the statutory accounting requirements of seven years.

#### **General Enquiries**

Data will be retained for the duration of the enquiry.

#### Any person seeking arbitration in a dispute with a member

The customer's information will be held on the member's file for future reference in regard to membership.

# If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

# Change of purpose

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another purpose and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis, which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

# Data sharing

We may have to share your data with third parties, including third party providers and other entities in the group. We require third parties to respect the security of your data and treat it in accordance with the law. We may transfer your personal information outside the UK. If we do,

you can expect a similar degree of protection in respect of your personal information.

# Why might we share your personal information with third parties?

We might share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. (See specific categories for more information)

# Which third party service providers process your personal information?

"Third parties" include third party service providers (including designated agents) and are listed under specific categories above.

# How secure is your personal information with a third party service provider and other entities?

All our third party service providers and other entities are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third party service providers to use your personal data for their own purposes. We only permit them to process your personal data for the specified purposes and in accordance with our instructions.

# What other third parties might your personal information be shared with?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to comply with the law.

# **Data Security**

We have put in place measures to protect the security of your information. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents or other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentially.

We have put in place procedures to deal with any suspected data breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

# Rights of access, correction, erasure, and restriction

#### Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

#### Your rights in correction with personal information

Under certain circumstances, by law you have the right to:

• Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation, which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing.
- Request the transfer of your personal information to another party. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact The Chief Executive in writing.

#### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

#### Right to withdraw consent

In the limited circumstances where you may have provided consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time, unless it has been produced in printed form distributed to the public or fellow members. To withdraw your consent, please contact The Chief Executive, Hazel Morley. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you have any questions about this privacy notice or how we handle your personal information, please contact The Chief Executive, Hazel Morley. You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

# Changes to this privacy notice

We reserve the right to update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact:

The Chief Executive
The Society of Master Saddlers (UK) Ltd
Green Lane Farm, Stonham, Stowmarket, Suffolk, IP14 5DS
01449 711642 enquiries@mastersaddlers.co.uk