

# GDPR – EGB Data Privacy Policy

## What personal data does EGB (Endurance GB Ltd) collect?

The data we collect includes names, addresses, age, gender and contact information. Medical information may be used in the event of an accident. Disability information is used to enable reasonable adjustments to be made to ride rules so that para riders can compete on an equitable basis. Parental consent forms are also submitted to ride organisers / secretaries.

The data is collected directly from Members, Staff, Volunteers or via EGB Groups.

We may also record data about people making enquiries to EGB who are not members or supporters for the purposes of providing information about membership and events.

We keep information regarding disciplinary actions and sanctions.

For some members we keep information about their board, committee, group or administrative roles (e.g. Ride Organisers and Secretaries) and whether they are an international trainer or an international athlete.

We may hold photographs of individuals including generic photographs where individuals may be difficult to identify.

We collect the results of competitions and these are used for maintaining the riding level, qualifications to ride (including in international competitions), of individuals along with annual rankings.

For members of staff we collect personal data and maintain personnel records in line with statutory requirements and best practice.

## What is this personal data used for?

We use members' data for the administration of your membership; the communication of information, including sending the EGB magazine and the organisation of rides and other events. Specifically a members' email address is used to send out online voting information about Board elections and AGM proposals. The postal address is used for this information when an email address is not available.

Medical information may be used in the event of an accident. Disability information is used to enable reasonable adjustments to be made to ride rules so that para riders can compete on an equitable basis. Parental consent forms are also submitted to ride organisers / secretaries.

We provide a limited amount of data for use by Ride Organisers, Technical Stewards and providers of support systems (e.g. RFID timing) for the proper and accurate administration of rides. A limited amount of data can also be submitted to other key officials from time-to-time, such as International Team, National Team and Group Team officials.

## Who is your data shared with?

Member data is provided to Ride Organisers, Ride Secretaries, Technical Stewards and FEI Officials for the purposes of administering rides entered by the Member, but only when an entry is made by the Member (or authorised delegate).

Member data is passed to our Card processing providers (currently SagePay and PayPal) for financial transactions related to ride entries, membership and other online purchases (e.g from the online shop)

Membership Lists are sent to the publisher of the printed magazine and rule book for the purpose of distributing Rule Books and the Member Magazine. The publisher deletes this information once the distribution has been made.

Membership Lists are sent to the Local EGB Group to which the Member belongs to allow communication about local events relevant to the Member.

Member and result data is sent to the FEI in relation to International registrations, entries and results.

Provision of results and rankings to other BEF Member bodies.

Results are provided to the EGB Archive database.

Medical information may be passed to the emergency services in the case of an accident.

Disciplinary and safeguarding records may be sent to BEF if relevant to overall equestrian sport. Information is also passed to the BEF if Anti-Doping Regulations are violated. Rider and horse information is passed to the BEF and then onward to the FEI for FEI Competitor Licenses and Passports. Passport information can also be passed to DEFRA.

Entry lists may be given to providers of technical support services (e.g. online and client-based timing and results systems such as HERO and Tawqeeet).

## Where does this data come from?

Member & rider data is sourced directly from the member through online or paper application forms and can be viewed and amended online by the member or by request to the EGB office.

International competition data may be obtained from the FEI.

Information about Overseas Riders eligibility to compete in the UK (NoCs) is obtained (via the Member) from Other National Competiton Organisations.

Result information provided by Ride Organiser/Secretaries and Technical Stewards.

Disciplinary and safeguarding information from other BEF Member bodies.

Membership of other BEF Member bodies.

## How is your data stored?

Most of our data, including our main database, is stored in a secure database hosted in “the cloud” using Google Cloud Platform in compliance with the GDPR.

Information for Ride Organisers and Technical Stewards is usually provided via spreadsheets which are held locally and destroyed when they are no longer required. Guidance has been issued to Ride Organisers and Technical Stewards on the safe storage of personal data.

Documents are normally in Word format and are increasingly stored in Microsoft OneDrive which is GDPR compliant.

Emails by the EGB Board, its Officers and the EGB Office are sent and received using Microsoft Office 365 which is GDPR compliant. Most volunteers use their own personal accounts.

The remainder of our data is kept in the form of written documents stored in our Abbey Park offices.

## Who is responsible for ensuring compliance with the relevant laws and regulations?

Under the GDPR (General Data Protection Regulation) we do not have a statutory requirement to have a Data Protection Officer. The person who is responsible for ensuring EGB discharges its obligations under the GDPR is the Executive Officer ([office@endurancegb.co.uk](mailto:office@endurancegb.co.uk)). The Executive Officer is the person responsible for maintaining a log of data breaches and notifying the ICO and any members affected as necessary, in accordance with our legal obligations.

## Who has access to your data?

Members of staff of EGB have access to members' data in order for them to carry out their legitimate tasks for the organisations, such as responding to enquiries from those members.

Members of committees, the board of EGB and the local EGB Group to which the member belongs will be given access to this data for any legitimate purpose to do with their roles as officers of the organisation or members of their committees but will not be free to pass it on to any other organisation.

Ride Organisers/Secretaries and Technical Stewards are sent the limited information necessary for them to accurately and safely administer rides.

Sub-contractors of EGB may be given access to data for specific tasks, such as mailing copies of EGB magazine on our behalf. They are not allowed to use it for any other purpose.

## What is the lawful basis for collecting this data?

EGB collects personal data that is necessary for the purposes of its *legitimate interests* as a membership organisation and as the authority of an internationally recognised and regulated, competitive sport.

For some data, such as that relating to financial matters, the basis for its collection and retention is to comply with our legal obligations.

Similarly, personnel data is kept in compliance with our legal obligations.

## How you can check what data we have about you?

If you want to see the basic membership data we hold about you, you can log in to The EGB Website and go to "Members | Account | View/Edit". There you can also update most of your details or change the permissions you wish to grant for the use of your data.

You can view your entire competition history in the EGB Archive, available by going to the website and selecting "Rides | Results | Archive".

You can contact us with a "Subject Access Request" if you want to ask us to provide you with any other information we hold about you. If you are interested in any aspects, specifying them will help us to provide you with what you need quickly and efficiently. We are required to provide this to you within 30 days.

There is not usually a fee for this, though we can charge a reasonable fee based on the administrative cost of providing the information if a request is manifestly unfounded or excessive, or for requests for further copies of the same information.

## Does EGB collect any “special” data?

The GDPR refers to sensitive personal data as “special categories of personal data”.

Medical information may be held when provided by a rider, in confidence, and used in the event of an accident. Disability information may be held and is used to enable reasonable adjustments to be made to ride rules, so that para riders can compete on an equitable basis.

Parental consent forms are also submitted to ride organisers / secretaries.

We also hold information on whether each member is a UK Citizen as it is a requirement of the FEI that any person who is not a UK Citizen has permission from their National Organising Committee to compete in National Competitions in the UK.

## How can you ask for data to be removed, limited or corrected?

There are various ways in which you can limit how your data is used:

- You could maintain your EGB membership with your correct name but with limited contact details. However, we do need to have at least one method of contacting you. You could for example simply maintain an up-to-date email address, but of course this would limit what we are able to provide you with in the way of written information, so you would not be able to get the EGB magazine in printed form or any other member benefits that require a mailing address.
- You do not need to provide us with your date of birth unless you wish to enter age-limited (Young, Junior or Veteran) classes or gain concessions based on age.
- You may choose not to receive information emails from the EGB sponsors. Note: Your email address is NOT provided to third parties, on very rare occasions we send the emails on their behalf.
- Any of these options can be implemented by logging on to the EGB website and going to "Members | Account | View/Edit" and editing your record there, either to correct erroneous data or to delete information you do not wish us to have. If you need any assistance with this, you may contact the Office at [office@endurancegb.co.uk](mailto:office@endurancegb.co.uk).
- You may ask that any photograph of you that appears on the website be deleted by contacting the Office at [office@endurancegb.co.uk](mailto:office@endurancegb.co.uk).

## How long we keep your data for, and why?

We normally keep members’ data after their membership lapses. This is because we find members sometimes later wish to re-join (occasionally after several decades) and if we no longer had their records we would be unable to re-instate their correct competitive level, which would be unfair both to the member concerned and other members against whom they are competing. However, we will delete any former member’s contact details entirely and will comply with a right to be forgotten on request.

Since underlying statistical data, like results, continues to be necessary in relation to the purpose for which it was originally collected and processed, results from events are not deleted although they will no longer be attributed to a member who does not want their data to be kept. (i.e. Removed from the online Archive)

Historical ranking lists and prize lists are required for archiving purposes and names cannot be removed from them. Similarly, archived news articles, whether on the website, or in EGB's magazines (both printed and online), will not usually be deleted.

Other data, such as that relating to accounting or personnel matters, is kept for at least the legally required or recommended period – 7 years for financial transactions, 12 years after the final benefit for staff pensions.

### What happens if a member dies?

We normally keep members' information after they die and show their achievements in various annual and all-time rankings, such as distance awards. If requested by their next-of-kin to delete it, we will do so on the same basis as when requested to remove data by a former member.

### Can you download your data to use it elsewhere?

We have no specific facilities to download your data, but will assist members in legitimate situations, for example where proof of experience is required by another National Organising Committee. Please contact the office on [office@endurancegb.co.uk](mailto:office@endurancegb.co.uk) with such requests.

### What Cookies Do We Use?

Our website uses cookies. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies may be either "persistent" cookies or "session" cookies:

- A persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date
- A session cookie will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies. We use both session and persistent cookies on our website. The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:

<b>Google Analytics</b>	Collect information how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, from where visitors
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FR0/1	have come to the site and the pages they visited. Click <a href="#">here</a> to view the Google Analytics Privacy Policy. You can choose to opt out of Google Analytics.
<b>RequestVerificationToken_LOROT19FR0/1</b>	Prevent fraudulent requests
<b>language</b>	This cookie stores the language of the visitor,
<b>ASP.NET_SessionId</b>	General purpose cookie, essential for the application. Click <a href="#">here</a> for more information.
<b>.ASPXANONYMOUS</b>	This cookie is used by sites using the .NET technology platform from Microsoft. It enables the site to maintain an anonymous user-id to track unique users within a session without them logging in or otherwise identifying themselves.
<b>dnn_IsMobile</b>	This cookie is used to identify the use of mobile devices

Most browsers allow you to refuse to accept cookies; for example:

- in Internet Explorer (version 10) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced".
- in Firefox (version 24) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites".
- in Chrome (version 29), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

You can delete cookies already stored on your computer; for example:

- in Internet Explorer (version 10), you must manually delete cookie files (you can find instructions for doing so at <http://support.microsoft.com/kb/278835>).
- in Firefox (version 24), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history", clicking "Show Cookies", and then clicking "Remove All Cookies".
- in Chrome (version 29), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Delete cookies and other site and plug-in data" before clicking "Clear browsing data".

Deleting cookies will have a negative impact on the usability of many websites.