



Wetherby Steeplechase Committee Ltd Data Management and Privacy Policy

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Introduction

Wetherby Steeplechase Committee Ltd are a data controller of the personal information we receive or collect about you. Wetherby Steeplechase Committee Ltd are registered as a data controller with the Information Commissioner's Office and our registration number is Z8667270.

Our full contact information is available on page 8 of this document.

This Data Management and Privacy Policy sets out the data processing practices carried out by Wetherby Steeplechase Committee Ltd. We are committed to protecting the privacy and security of your personal information and all data thus captured will be used and held in accordance with the requirements of the General Data Protection Regulation (EU GDPR 2016/679).

In this Privacy Policy references to 'we' and 'us' refer to Wetherby Steeplechase Committee Ltd.

1. Data Collection

We collect information from our customers using:

- Product Orders
- Online Enquiry Forms
- Contact Us Pages
- eNewsletter Sign Up Forms
- Wi-Fi Log In Forms
- Competitions
- Email Hyperlinks
- Social Media Links

We also collect details when you email us with an enquiry, and may keep the email correspondence for our records. We also collect information about the transactions you undertake through this site; however, this does not include details of payment cards used.

The information we collect via Wetherby Steeplechase Committee Ltd's website may include:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing and delivery address, email address and telephone numbers
- **Financial Data** includes bank account and payment card details
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions,

operating system and platform and other technology on the devices you use to access this website.

- **Profile Data** includes your user name and password, purchases and orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing & Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly identify you. If we combine or connect Aggregated Data with your personal data so that it can be used directly or indirectly to identify you, then we will treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (This includes details about your race or ethnicity, religious or philosophical beliefs, sexual preferences or orientation, political opinions, union memberships, or information about your health or biometrical data) via our website. Nor do we collect any information about criminal convictions and offences.

We may collect details of any disabilities, dietary requirements or other health issues that you have informed us about in order to administer your visit to our Racecourse.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into. (For example to provide you with goods or services.) In this case, we may have to cancel a product or service you have with us but will notify you if this is the case at the time.

Children

Our website, products and services are not intended for persons under the age of 18. We do not knowingly collect data relating to children under the age of 18

2. Data Storage

Any personal information such as name, address, email and phone, will be stored on Wetherby Steeplechase Committee Ltd's customer database.

You can unsubscribe from our e-mailing list at any time by clicking the "unsubscribe" link in the emails we send via ACT Swiftpage. Alternatively you can email Wetherby Steeplechase Committee Ltd and we will remove your email address from our mailing list.

We will automatically delete your data from our database if you have not completed a transaction with us in the last 6 years.

Under no circumstances will we hold sensitive payment details such as your card number, expiry date and security code.

3. Use of Data

Any personal information we collect will be used in accordance with the General Data Protection Regulation (EU GDPR 2016/679) and other applicable laws.

3.1 For Operations and Services:

- Dealing with your enquiries and requests and carrying out our obligations that arise from any contract we may enter into with you. When you make a transaction with us, this forms a contract between Wetherby Steeplechase Committee Ltd and yourself. In order for us to fulfil our obligations under this contract we will need to collect and process your personal data. Failure to provide us with accurate personal or financial data or objecting to this type of processing may result in us being unable to provide goods / services to you.
- We may, when necessary to complete your order, share data (i.e. booking name / contact number / email) with our Caterers and Event Managers, CGC Event Caterers Ltd.
- Information you enter into our booking forms may be collected and stored briefly by us so that we may contact you in relation to the nature of your enquiry/attempted transaction, even if you do not confirm the transaction.
- If you submit your views to us electronically or otherwise we may circulate them internally for training and management purposes.
- To administer our records internally.

3.2 To Keep you Informed:

- To provide you with marketing information about other services or products we offer that are similar to those that you have already purchased, or services or products. This will be in accordance with the marketing preferences that you indicated when you completed any of our online forms.
- We will only contact you about our products and services for marketing purposes when you have given us your consent to do so, for each appropriate method of contact. We will send you service messages when they are deemed to be appropriate for you.
- To deliver (with your consent) effective and personalised marketing material and content from Wetherby Steeplechase Committee Ltd and to assist us in the

improvement and optimisation of advertising, marketing material and content, our services and the Sites.

3.3 To Improve our Services and Products:

- To conduct data analysis and insight to better understand the services and products our customers want from us. This data is used to administer our site and for internal operations, such as data analysis. Your data is anonymised in this regard.
- To measure, understand or monitor the effectiveness of advertising, promotions, marketing material and content.

3.4 What we will not do:

- We will not use this data for any other purpose, we will not store it for longer than necessary and we will not share it with any other company, unless we have your expressed permission to do so.
- We will not use any financial or credit card information for any purpose other than to discharge our legal / regulatory duties and to process payments paid by you for our products and services or due to you by agreement (e.g. refunds).

4. Consent

We will send you marketing messages through various channels (such as email, text or post) about us and our events and fixtures. We will do this when you have provided us with your consent to use your information for internal marketing purposes. You can remove your consent and opt out at any time.

If you have not purchased from us but have confirmed that you would like to hear about offers, products and services, we will use your details to contact you with marketing information.

If you have confirmed you would like to hear from third parties that we work closely with, then we will share your details with our third parties so they can contact you about their products and services.

You have the right to withdraw your consent at any time and we will cease sending you marketing messages. We will still send you services messages such as booking confirmations and abandonment emails.

If you opt out at any time, your details will be suppressed as soon as possible. Suppression involves retaining just enough information to ensure that marketing preferences are respected in the future.

5. Legitimate Interests

When we use your personal information for any other purpose described in this policy, we will rely on a legal condition known as 'legitimate interests'. It is our legitimate interest to collect and utilise your personal data to effectively manage our business and improve our services.

In order for us to do this, we have to carry out a 'balancing test' of our interests in using your personal data, against the interests you have as an individual and the rights you have under data protection laws.

The outcome of this balancing test will determine whether we can use your personal data in the ways described in this Privacy Policy (except in relation to certain marketing activities, where we will always rely on your explicit consent). We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

6. Sharing Data

We will only disclose data to entities outside of Wetherby Steeplechase Committee Ltd. when obliged to disclose personal data by law, or the disclosure is 'necessary' for purposes of national security, taxation and criminal investigation, or we have your consent.

We will only share your personal information with our affiliates and the third party service providers if this is necessary or reasonably required for any of the purposes listed above. Such third party service providers are not entitled to use your information for their own purposes.

7. Your Data Rights

Under current data protection legislation you have the following rights:

- a) The right to access personal data that we hold about you.
- b) The right to require us to update our records to ensure the data we hold is accurate.
- c) The right to require us to delete your personal data. There will be instances where this right is restricted (see 5. legitimate interests).
- d) The right to restrict how we process your data (e.g. if you dispute its accuracy).
- e) The right to require us to transfer your data to another organisation.
- f) The right to object to data processing. There will be instances where this right is restricted (see 5. legitimate interests).
- g) The right not to be subject to the decision of an automated process, such as profiling, when this would produce a legal effect on you.
- h) The right to withdraw your consent. We will make this a simple and easy process for you through 'unsubscribe' links in all of our marketing communications.

You can unsubscribe from our marketing channels, or change your communication preferences, at any time. You can also email Wetherby Steeplechase Committee Ltd and request that we unsubscribe you.

We will send you information according to the preferences you submitted via our data capture form and our preference centre. If you would like to change these preferences at any point, please email Wetherby Steeplechase Committee Ltd or access your preferences and change them.

You are entitled to see the information held about you and may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact us at info@wetherbyracing.co.uk. We are entitled by law to charge a fee of £10 to meet our costs in providing you with details of the information we hold about you.

8. Photography and Racecourse TV

You are reminded that many races and fixtures are given coverage on television, radio and in print and various other forms of media. By entering the Racecourse you accept (for yourself and on behalf of any horse or children in your care) that you / they may appear in such coverage.

9. Other Websites

Our website may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their Privacy Policy, which may differ from ours.

Wetherby Steeplechase Committee Ltd encourages you to review the privacy statements of websites you choose to link to from Wetherby Steeplechase Committee Ltd so that you can understand how those websites collect, use and share your information. Wetherby Steeplechase Committee Ltd is not responsible for the privacy statements or other content on websites outside of the Wetherby Steeplechase Committee Ltd and Wetherby Steeplechase Committee Ltd family of websites.

We would like to make you aware that we regularly promote our content over social media (Facebook, Twitter, Instagram). These sites have their own privacy policies and terms and conditions, which are separate from our own and your exposure to marketing will be contingent on the preferences you have registered with these sites.

10. Cookies

Our website uses "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you personalize Wetherby Steeplechase Committee Ltd pages, or register with Wetherby Steeplechase Committee Ltd site or services, a cookie helps Wetherby Steeplechase Committee Ltd to recall your specific information on subsequent

visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Wetherby Steeplechase Committee Ltd website, the information you previously provided can be retrieved, so you can easily use the Wetherby Steeplechase Committee Ltd features that you customized.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Wetherby Steeplechase Committee Ltd services or websites you visit.

11. Amendments

Please note that this Privacy Policy is subject to change from time to time. It was last updated on the 16th May 2018. We encourage you to periodically review this Policy to be informed of how Wetherby Steeplechase Committee Ltd is protecting your information.

12. How to Contact Us

If you have any questions or concerns about this privacy notice or would like to be informed about the information we hold about you, please do not hesitate to contact us by one of the methods below.

We are entitled by law to charge a fee of £10 to meet our costs in providing you with details of the information we hold about you.

Contact us:

By Post: Privacy Enquiries, Wetherby Steeplechase Committee Ltd, The Racecourse, York Road, Wetherby, West Yorkshire, LS22 5EJ

By e-mail: info@wetherbyracing.co.uk

By phone: 01937 582035