#### INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data through your use of our site https://equineshiatsu.org or through membership forms and applications for CPD.

By providing us with your data, you warrant to us that you are over 13 years of age.

The Equine Shiatsu Association are the data controller and we are responsible for your personal data (referred to as "I", "my", "we", "us" or "our" in this privacy notice).

Contact Details (note only some of these may be applicable depending upon your circumstances)

Our full details are:

The Equine Shiatsu Association

Chair: Liz Eddy, Flatfield, Errol, Perthshire PH2 7RW

Tel: 01821 642334

Email address: liz@equestrian-shiatsu.com

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing mus at <a href="mailto:liz@equestrian-shiatsu.com">liz@equestrian-shiatsu.com</a> or by writing to us at the above postal address

# WHAT DATA DO I / WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT

Personal data means any information capable of identifying an individual. It does not include anonymized data.

We may process the following categories of personal data about you:

Communication Data that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send to us. We will process this data solely for the purposes of communicating with you for record keeping purposes. Our lawful grounds for this processing is our legitimate interests which in this case are to reply to communications sent to us, for the purpose of keeping records up to date.

Customer Data that includes data relating to any services such as your name, title, home address, email address, and phone number(s). We process this data to supply the treatments and/or services you have purchased and to keep records of such transactions. Our lawful grounds for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

User Data that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant

content is provided to you, to ensure the security of our website, to maintain backups of our website and/or databases and to enable publication and administration of our website and for other online services and business. Our lawful grounds for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

Technical Data that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website. The source of this data is from our analytics tracking system. We reserve the right to process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful grounds for this processing is our legitimate interests which in this case are to enable us to properly administer our website.

Marketing Data that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable us to you to provide you with details of the services we provide, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful grounds for this processing is our legitimate interests which in this case are to develop our marketing strategy.

We may use Communications Data, Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising I / we serve to you. Our lawful grounds for this processing is legitimate interests which is to operate our business. Our lawful ground for this processing is either consent or legitimate interests.

## **HOW I / WE COLLECT YOUR PERSONAL DATA**

We may collect data about you by you providing the data directly to us (for example by filling in forms in our website or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy for more details about this.

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical or payment services, such as data brokers or aggregators.

#### **DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below: Service providers who provide IT and system administration services. Professional advisers including lawyers, bankers, auditors and insurers

#### **DATA SECURITY**

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on my / our instructions and they must keep it confidential.

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

## **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that includes the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at: <a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/">https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/</a>

If you wish to exercise any of the rights set out above, please contact me / us at the addresses shown in this Privacy Policy. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive and I / we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help me / us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<a href="www.ico.org.uk">www.ico.org.uk</a>). We would be grateful if you could contact us first if you do have a complaint so that we can try to resolve it for you.

## THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

#### **COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. Further information about the cookies we use includes:

Our website may place and access certain Cookies on your computer. These Cookies are used to improve your experience of using the our website and to improve our range of services. We have carefully chosen these Cookies and steps have been taken to ensure that your privacy is protected and respected at all times.

All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling me / us to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our website may not function fully or as intended.

This Website may place the following Cookies:

Strictly necessary cookies: These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

Analytical/performance cookies: They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are easily finding the information they are searching for.

Functionality cookies: These are used to recognise you when you return to our website. This enables us to personalise our content for you, which might include greeting you by name and remember your preferences.

Targeting cookies: These cookies record your visit to our website, the pages you have visited and the links you have followed.

You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

You can choose to delete Cookies at any time; however, you may lose any information that enables you to access our website more quickly and efficiently including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings

This Privacy Policy was last updated on 12/12/2018