

## PRIVACY STATEMENT

New standards are being introduced by the European Commission, known as the General Data Protection Regulation (GDPR) which ensures organisations are more accountable for the safety of your data, and provides you with more rights around how organisations handle and use that data. This Privacy Policy explains what personal information we collect about you, why we collect it, who we share it with and how long we retain it. It also explains who to contact should you have concerns about how we handle your data and your rights under data protection law.

This Privacy Statement applies to all personal data collected by the Horse Passport Agency Ltd. ("us", "we", "our"). By contacting us, or accessing our website you confirm your consent to us collecting and using your information in accordance with the practices described in this Privacy Statement. If you are registering other people to use our services where you are the key contact, and are providing personal information about these individuals, you must ensure that this privacy policy has been drawn to the attention of those individuals and you have their permission to share information with us. Where the individual is under the age of 16 years, you must ensure that you have parental consent to provide us with the personal information relating to the child.

From time to time we may need to make changes to this privacy policy, for example, as the result of government regulation, new technologies, or other changes in data protection laws. You should check our website, [www.horsepassportagency.co.uk](http://www.horsepassportagency.co.uk), periodically to review the most up to date privacy policy.

**About Us:** Horse Passport Agency Ltd is a company approved by DEFRA since 2003 to issue and maintain equine identification documents for horse, donkey, zebra, mule and other equine hybrids. The company is incorporated and registered in England and Wales (Company No. 4734122) whose registered office is at Top House Farm, Ellesmere, SY12 9HS.

Horse Passport Agency Ltd is the data controller and data processor under the Data Protection Act 1998 in relation to the controlling and processing of your personal data in connection with Horse Passport Agency and Pleasure Horse Society passports and our online services (Owner Services & Vet Services). We are responsible for complying with data protection laws. If you have any queries relating to our use of your personal data or any other related data protection questions, please contact our Data Protection Manager at [privacy@horsepassportagency.co.uk](mailto:privacy@horsepassportagency.co.uk). Our data protection registration number is Z8145358.

**Who do we collect personal information about?:** Present, past and prospective customers; Individuals who have been identified as selling an equine that is registered with us; Individuals who enquire about our organisation and its services; and Individuals that sign up to marketing communications.

**What Personal Information Do We Collect & Hold:** This depends on our relationship with you (are you a registered owner, registered for Owner Services or simply have contacted us for information etc) but will usually include: Name & Address; Email address; Phone number; Date of Birth; Nationality; Copies of correspondence we have sent to, or received from you; IP address; type and version of web browser and operating system used by the website visitor; Password for access to Owner Services section of the website and Marketing preferences.

Payment card details. We use Global Payments to process any card payment. Global Payments (trading name of GPUUK LLP) is the preferred supplier of our bank HSBC. When you submit a payment online this goes directly to Global Payments own website. When you pay over the phone a member of our staff enters the information directly onto Global Payments website and we do not keep a record of your card details. If you submit written card details to us by post we will enter this information on to the Global Payments website and will securely destroy that part of your paperwork.

**How do we collect your personal information?** By postal application forms submitted to us, by telephone and email and via our website or Facebook page. With Pleasure Horse Society passports your information may have been supplied to us by Pleasure Horse Society Ltd via their database or copies of application forms when we took over the maintenance of those horse passports on 23rd December 2010.

**How we will use your personal data & who we share it with:** The primary purpose of the Horse Passport Agency is to enable horse owners to comply with the relevant horse passport legislation.

If you are based in the UK, or are registered as the owner of a horse we have registered in the UK, that information is forwarded to the UK governments Central Equine Database on a daily basis. If you are based in the Republic of Ireland, or have registered your ownership of a passport issued originally in the Republic of Ireland, we are required to supply that data to the government of the Republic of Ireland for use on their Animal Identification and Movement database.

We may also be required to provide your personal information to comply with a specific request from Local Authorities, Police or Government. We may send you email or text notifications which we believe you have specifically requested or to contact you to ensure your information held with us is still correct. Some of your information may be used to create summary statistics, which allow us to measure the number of visitors to our site, identify what pages are accessed most frequently and generally, help us to increase the usability and accessibility of our site.

If you have given your consent for us to contact you for the purpose of marketing we may contact you from time to time with information or products from third parties which we have selected and believe may be of interest to you. We will not release your data to a 3rd party for the purpose of marketing.

**Legal grounds under which we process your personal data:** We use your personal information for a number of different purposes detailed below. Under data protection law, for each purpose we must be able to rely on a legal ground to justify why we are using your personal information: The lawful bases for processing are set out in Article 6 of the GDPR:

**1. Processing and Maintaining Horse Passports:** When you apply for an equine passport, or register your ownership within an existing equine passport, the Horse Passport Agency has a legal obligation to hold and process your personal data to comply with the law. This means that we are required to hold your personal data even after your ownership of the animal may have ended.

**2. Maintaining Our Database Records:** From time to time we may contact you to ensure your records are up to date. This processing is necessary for our legitimate interests or the legitimate interests of a third party.

**3. Potentially Stolen or Straying Equine:** We may contact you if we believe an equine registered in your name has strayed or been stolen. This processing is necessary for our legitimate interests or the legitimate interests of a third party or necessary for us to perform a task in the public interest.

**4. Marketing for Third Parties:** Only if you have provided consent will we use your data for the purpose of marketing. Your consent for this can be withdrawn at any time by:  
Clicking on the "unsubscribe" link in the marketing email; Logging in to Owner Services at [www.horsepassportagency.co.uk](http://www.horsepassportagency.co.uk) and selecting "My Details" and changing your details, or  
Writing to The Data Protection Manager at Horse Passport Agency, Po Box 74, Ellesmere, SY12 2AD or by email to [privacy@horsepassportagency.co.uk](mailto:privacy@horsepassportagency.co.uk)

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**How long will we retain your personal information?** We only keep your personal information for as long as it is reasonably necessary to fulfil the relevant purposes described in this privacy policy or if required by law we may keep your information for longer. Defra (Minimum Operation Standards November 2015) currently require that Passport Issuing Organisations records must be kept for at least 35 years, or until at least 2 years from the date of death of the animal recorded.

Where your record is not linked to an animal (for example where you have an inactive Owner Services account) we aim to remove your details after 2 years of inactivity.

**How do we protect your information?** Once we have received your data we will ensure that it is treated with the utmost respect and in accordance with the Data Protection Act 1998 and any applicable regulations. We follow strict security procedures in order that the data we collect is stored and disclosed appropriately and securely. The Internet is not a 100% secure medium for communication and, accordingly, we cannot guarantee the security of any information you send to us via the Internet. We are not responsible for any damages you, or others, may suffer as a result of the loss of confidentiality of such information.

**Third Party Websites:** You need to be aware that third party websites which are linked to our website or which you may need to access and use to obtain any third party products or services featured on our website, may contain privacy provisions that differ from this Privacy Statement. Such third parties may use your information differently to the way in which we shall use it.

### Your Rights:

The right to access your personal information: Subject to any relevant exemptions, you are entitled to see a copy of the personal information we hold about you and to request details of how we use your personal information including any disclosures made. To exercise your rights to access your personal information please contact us at [privacy@horsepassportagency.co.uk](mailto:privacy@horsepassportagency.co.uk) Your personal information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case your personal information will be provided to you by electronic means where possible. We will require you to provide; Your full name; Signed consent form from account holder; A copy of a recent utility bill or bank statement; A copy of your passport or photo-card driving licence

The right to rectification: We take reasonable steps to ensure that the personal information we hold about you is reliable and as accurate and complete as is necessary for its intended use, but you are entitled to ask us to update or amend any inaccuracies in the personal information that we hold about you. To request us to correct any personal information we hold about you, please contact us in the first instance at [privacy@horsepassportagency.co.uk](mailto:privacy@horsepassportagency.co.uk).

The right to object to marketing: As set out in the section on marketing, you are entitled to object to receiving marketing material from us at any time. You can exercise this right by clicking 'unsubscribe' on any marketing email you receive from us or by contacting us at [privacy@horsepassportagency.co.uk](mailto:privacy@horsepassportagency.co.uk).

The right to be forgotten: You are entitled to request that any personal information that we no longer have a legal ground to rely on be removed. You can exercise this right by contacting us at [privacy@horsepassportagency.co.uk](mailto:privacy@horsepassportagency.co.uk).

The right to change your consent wishes: Where processing is based on consent, you are entitled to withdraw your consent so that we stop that particular form of processing. You can exercise this right by contacting us at [privacy@horsepassportagency.co.uk](mailto:privacy@horsepassportagency.co.uk)

The right for data portability: You are entitled to request that we provide to you or another provider with a copy of your personal information that you provided us with. You can exercise this right by contacting us at [privacy@horsepassportagency.co.uk](mailto:privacy@horsepassportagency.co.uk)

Your right to complain: If you are not satisfied with our use of your personal information, our response to your exercised rights, or if you believe us to be in breach of our data protection obligations, you have the right to complaint to the Information Commissioners Office at; (<https://ico.org/concerns/>).

**How to contact us:** If you have any queries relating to the Horse Passport Agency Privacy Policy please contact us by writing to The Data Protection Manager, Horse Passport Agency Ltd, PO Box 74, Ellesmere, SY12 9HS.

Updated: 24/05/2018