

## **PRIVACY NOTICE FOR CLIENTS**

In accordance with the General Data Protection Regulation Festina Lente Enterprises LTD, have implemented this privacy information notice to inform you, our current and former clients, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to current and former clients.

### **A) DATA PROTECTION PRINCIPLES**

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a. processing is fair, lawful and transparent
- b. data is collected for specific, explicit, and legitimate purposes
- c. data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d. data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e. data is not kept for longer than is necessary for its given purpose
- f. data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g. we comply with the relevant GDPR procedures for international transferring of personal data

### **B) TYPES OF DATA HELD**

We keep several categories of personal data on and from our clients and former clients in order to carry out effective and efficient processes. We hold the data within our computer systems, for example, our accounts and database systems.

Specifically, we hold the following types of data:

- a. personal details such as name, address, phone number, mobile phone number, email address and emergency contact details etc. for the main contact and other contacts for the delivery of the service.
- b. personal details such as, skills and abilities, date of birth, age, height and weight etc. for the main contact and other contacts for the delivery of the service.
- c. gender, marital status, race, religion, information of any disabilities or other medical information that is supplied to us for the purposes of delivering our services (riding lessons, workshops etc.)

- d. bank account details
- e. IT service use including online shop.

### C) COLLECTING YOUR DATA

You provide several pieces of data to us directly when registering, purchasing or using our services, completing contact form, signing up to our newsletter, etc

Personal data is kept in files or within the Company's IT systems.

### D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the services we supply, including ensuring we can deliver the service to you.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

<b>Activity requiring your data</b>	<b>Lawful basis</b>
Account set up and administration	Our legitimate interests
Carry out the delivery of the services you have on your account	Our legitimate interests
Ensuring payments are made under your account	Our legitimate interests
personalisation of content, business information or user experience	Our legitimate interests
delivering marketing and events communication	consent
carrying out polls and surveys	consent
internal research and development purposes	Our legitimate interests
providing goods and services	Our legitimate interests
Effectively monitoring the services provided including adherence to commitments and service entitlements	Our legitimate interests
Ensuring VAT and insurance premium tax is paid	Legal obligation
Making financial decisions in relation to products and services	Our legitimate interests
Making decisions about service delivery methods	Our legitimate interests

Maintaining up to date records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in place	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests

## E) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to:

- a. health
- b. sex life
- c. sexual orientation
- d. race
- e. ethnic origin
- f. political opinion
- g. religion
- h. trade union membership
- i. genetic and biometric data.

We carry out processing activities using special category data for the purposes of providing goods and services and in relation to health and safety legislation. This data will be provided to us or requested by us for in order to ensure you receive appropriate goods, services, advice and support.

Most commonly, we will process special categories of data when the following applies:

- a. you have given explicit consent to the processing
- b. we must process the data in order to carry out our legal obligations
- c. we must process data for reasons of substantial public interest
- d. you have already made the data public.

## **F) FAILURE TO PROVIDE DATA**

Your failure to provide us with data may mean that we are unable to fulfil our requirements for the provision of goods or services to you. This could include being unable to offer you goods and services or administer existing services.

## **H) WHO WE SHARE YOUR DATA WITH**

All employees within the BUSINESS that handle your personal data are trained in ensuring data is processed in line with GDPR.

We may share your data with third parties where access to data is required for maintenance/update of our IT hardware and software, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

## **I) PROTECTING YOUR DATA**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

## **J) RETENTION PERIODS**

We only keep your data for as long as we need it for, which will be at least for the duration that you are a client us, though in some cases we will keep former clients data for a longer period. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below:

<b>Record</b>	<b>Recommended Retention Period</b>
Money purchase details	6 years after transfer or value taken
All other data	7 years from the date of termination of the client relationship

## **K) AUTOMATED DECISION MAKING**

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

## **L) CLIENT RIGHTS**

You have the following rights in relation to the personal data we hold on you:

- a. the right to be informed about the data we hold on you and what we do with it;
- b. the right of access to the data we hold on you. More information on this can be found in the section headed "Access to Data" below and in our separate policy on Subject Access Requests";
- c. the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d. the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e. the right to restrict the processing of the data;
- f. the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g. the right to object to the inclusion of any information;
- h. the right to regulate any automated decision-making and profiling of personal data.

## **M) CONSENT**

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

## **N) MAKING A COMPLAINT**

If you think your data rights have been breached, you are able to raise a complaint with the Data Protection Commissioner. You can contact the Data Protection Commissioner by post at Canal House, Station Road, Portarlinton, R32 AP23 Co. Laois or by telephone on 1890 252 231 (Locall) or +353 57 8684800

## **O) DATA PROTECTION COMPLIANCE**

Our appointed compliance officer in respect of our data protection activities is:

Catherine Buckley,

HR and Data Protection

Phone: 01 2720704 ext. 200

Email: [catherine.buckley@festinalente.ie](mailto:catherine.buckley@festinalente.ie)