



Roland Bellido

RIDING TUITION

PRIVACY POLICY

Appointed Person with responsibility for Data Protection: **Roland Bellido** Registered with the ICO: **Yes**

Information Held

The following information is collected: Client name, address, date of birth, email address, phone numbers, emergency contact details, information about any medical conditions/injuries that may affect their ability to ride, any medication they take, in order to pass on to emergency services in the case of an accident. Information the client chooses to provide about their riding ability and their horse in order to help me best tailor coaching to the clients requirements.

Details of any incidents/accidents involving my clients will also be recorded and stored.

Data Collection

Data is collected over the phone, via Facebook messenger, email, or text in order to book appointments and take contact details. Further information as detailed above is collected when the client fills in a rider registration form.

Data Processing and Consent

By requesting a lesson and my offering to provide that service constitutes a contract. Data will be processed to meet our legal **contractual obligations** and provide you with the best possible service. You can withdraw your consent but then I would not be able to continue to teach you. I have "legitimate" interest in collecting basic information about you so I can provide safe and professional service for you.

Making contact with you to respond to enquiries, confirm appointments and update you on matters relating to your coaching sessions constitutes as **legitimate interest** to you as a client.

For any marketing activities - **explicit consent** will be obtained by asking you to opt in on the Rider Registration sheet. We would like to send you the occasional newsletters/special offer/ update of events etc. The program used for distributing email newsletters is Mailchimp. If you consent your email address will be stored on a Mailchimp Account. There is a link at the bottom of the newsletter to unsubscribe from this service or you can contact me at any time to be removed from this list.

If clients return for coaching after a year or more I will recheck their preferences for appointment conformation/reminders and for receiving newsletters.

I do not communicate directly with clients under the age of 16, all communication will go through their parent/guardian. The parent/guardian will be asked to fill in the Rider Registration form.

Data Storage

Online data for contacting patients and to book appointments is stored on Cliniko. Cliniko uses Amazon Web Services (AWS) and is a member of the Association of Cloud Infrastructure Service Providers in Europe. Cliniko is GDPR compliant.

Paper records are stored at my home address in a locked filing cabinet. Access to the cabinet is only permitted to myself and my wife Katherine Terry who assist with book keeping and accounting.

In the event of my death, responsibility for client records will fall to Katherine Terry.

Data disposal

Clients have the right to request that any data I hold about them can be amended if incorrect or permanently deleted. Accident report forms cannot be deleted before statutory requirements for data retention, or up to 25 years of age for children. After this period you can request that your records are deleted. Unless requested I will retain your records indefinitely in order that I can provide you with the best possible service should you require coaching at a future date.

If requested by the client, or we know the client will no longer be requesting coaching due to relocating, injury etc. (after the minimum statutory requirements for accident report forms) records are destroyed by shredding or incineration and electronic records are permanently deleted from the system.

Data Sharing

Only myself and my wife Katherine Terry, who assists with admin/book keeping/ accounts, will have access to your records. Information is never shared with other persons without the client's permission unless compelled to, in order to meet legal obligations, regulations or valid governmental requests.

Data Checks

If the client return after a year or more break from having coaching sessions I will ask them to fill in a Data Check list to ensure our records are up to date and to recheck consent to receive newsletters.

Subject Access Requests

Request to access what personal data is held should be directed to Roland Bellido. Identification will be required. A minimum of one piece of photographic ID listed and a second supporting document is required - copy of your driving licence, passport, birth certificate and a utility bill, not older than three months. If dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to Roland@ridingtuition.co.uk or by phoning 07879413155.

INFORMATION SECURITY POLICY

Access to paper records is restricted to myself and my wife Katherine Terry, who has signed a confidentiality agreement.

All electronic data is password protected. Systems are kept updated and antivirus security systems are in place and updated. Authorized users are responsible for the security of their passwords and accounts.

Passwords are changed every 6 months.

Data breaches will be detected by observing signs of unauthorized entry to storage areas, monitoring communications or becoming aware of a security breach (e.g. a virus or unauthorized log on or change to permissions) on the computer system. Data breaches will be investigated and reported to the Information Commissioner's Office by the appointed person. Clients will be informed if we believe a data breach has occurred.

Clients may contact the Information Commissioner's Office if they believe a data breach has occurred. Information Commissioner's Office: 0303 123 1113

Payments are made by cash, cheque or bank transfer and as such no payments details are stored electronically.