

# LIGHT CAVALRYMEN AND SUPPORTING RIDERS



## PLEASE READ THIS

### It's about **YOUR PERSONAL DATA**

Major changes are about to take place to UK law relating to data privacy and protection which includes personal information (“data”) which the Light Cavalry, Honourable Artillery Light Cavalry (the Light Cavalry) keeps about you. This cannot be a short communication because of the scale of the changes taking place (with effect from 25th May) but **it is vital** that you take the time to carefully and thoroughly read the Privacy Notice which follows.

To assist your understanding the Notice deals with the following points :

- What is Lawful Processing
- What data does the Light Cavalry acquire and keep about you
- Where does the Light Cavalry get the data from and how is the data stored
- Does the Light Cavalry transfer your data elsewhere
- How long does the Light Cavalry retain your data
- Your rights

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## **PRIVACY NOTICE**

### **1. INTRODUCTION**

On 25th May 2018 new legislation on Data Protection enters into force (The General Data Protection Regulation - “GDPR”). GDPR replaces previous legislation and contains lots of obligations which the Light Cavalry must fulfil and lots of rights which you as Members have vis-à-vis the Light Cavalry. Many of the Rules are the same as under previous legislation but there is plenty of new material.

GDPR is an EU Directive directly applicable in all Member states without the need for local legislation and with effect from 25th May 2018. However, the UK has decided that it wants the content of GDPR to apply after the UK leaves the EU and has tabled a Bill in the House of Lords which will achieve this objective. At first sight the Bill looks the same as GDPR (with adjustments which the Light Cavalry believes are mainly not relevant to the Light Cavalry’s position) but things change and the Light Cavalry will need to review its position once the Bill becomes law.

GDPR, including its preamble, contains some 54,000 words so the Light Cavalry hopes you will be understanding if we attempt to reduce that to some succinct explanations at the risk of leaving some questions in Members’ minds. GDPR allows the Light Cavalry (“Controller” in GDPR-speak) to introduce operational rules and policies compliant with the new Directive. If you spot an error please tell us by email.

DISCLAIMER: The information in this Privacy Notice is for general guidance on your rights and responsibilities and is not legal advice. If you need more details on your rights or legal advice about what action to take, please contact an adviser or qualified lawyer.

GDPR profoundly changes the way the relationship between the Light Cavalry and its Members works in relation to the information (data) which the Light Cavalry collects from you and then processes and stores. Some data is necessarily provided to or accessed by a third party such as an event venue, a caterer or the HAC accountant. Most of the law is mandatory but where there are options this notice will identify and explain the option the Light Cavalry is using. Many of the terms are rather technical but we need to use specific terms in order to say exactly what GDPR stipulates. The Light Cavalry's first task is to be a lawful processor of your data.

## **2. LAWFUL PROCESSING**

Membership of the Light Cavalry, whether as a full uniformed member or as a Supporting Rider, is a form of contract where Members pay a subscription in return for which Members receive benefits and services provided by the Light Cavalry. The Light Cavalry asserts that it is a lawful processor by virtue of this relationship and does not need to obtain specific consent to process data. The Light Cavalry also considers it is exempted from any obligation to appoint a Data Protection Officer (DPO) but it does accept the obligation to carry out processing in ways which are lawful, fair and transparent. The Light Cavalry may be required to appoint a designated DPO by the UK legislation.

## **3. TYPES OF DATA COLLECTED AND STORED**

The Light Cavalry is committed to recording accurate personal data which primarily consists of the information on the Membership Application Form as well as the banking information on the Standing Order form. We may also collect data about your riding ability, in order that we may better match riders to horses.

The Light Cavalry does not collect sensitive personal data such as genetic, biometric or health data. Nor does it collect information on race, ethnicity, religion, political persuasion, or sexual orientation. Such sensitive data is known in GDPR as *special category data*.

The Light Cavalry may use your data to enhance your experience of Light Cavalry Membership by recording your personal preferences, interests and geographical location.

The Light Cavalry may verify the information supplied in the Membership Application Form but does not seek additional information when considering an application. If information is published (i.e. in the public domain) about a Member, e.g. personal, professional or civic honour, award, achievement, etc the Light Cavalry is likely to add such information to your Member record.

The Light Cavalry keeps a central store of Members' personal data in its membership databases.

In the event of there being a data breach the Light Cavalry undertakes to inform you (as well as any relevant authority) not later than 1 month of the Light Cavalry becoming aware of the breach. The Light Cavalry does not believe that the data it holds give rise to any need to report a breach to the Information Commissioner within 72 hours but it is conscious of the possible need to do so. Paper records are also held securely.

## **4. TRANSFER AND SHARING OF DATA**

The Adjutant and the Stable Manager (which includes any assistants) are the principal processor of your data. The Light Cavalry's Officers may also wish to look at Member data from time to time.

The Light Cavalry will not be able to release to a member personal data about another member, even a telephone number or email address, without your permission.

When you attend functions or events organised by the Light Cavalry the venue will normally, for security and practical reasons, want a list of names and the caterer will want a list of any special dietary requirements.

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For the time being the Light Cavalry intends to continue its practice of providing Member names and addresses in its Members Lists, which are confidential to Members.

The Light Cavalry does not knowingly transfer your data outside the EU and requires all its suppliers not to make such transfers. The ultimate location of computer servers can make this apparently simple commitment difficult to enforce.

## **5. RETENTION OF DATA**

Names, contact details and relevant Light Cavalry admission, resignation and death dates are maintained in the database as a historical record of the Light Cavalry's members.

## **6. YOUR RIGHTS**

- To complain

Ideally the Light Cavalry would wish to try to deal with complaints itself before recourse to any external authority and asks Members to submit complaints via email or post, but it is open to Members to submit a complaint at any time to the Office of the Information Commissioner.

- To have correct data recorded by the Light Cavalry

The Light Cavalry will be happy to correct errors and to update its records when circumstances change.

- To require the Light Cavalry to erase data which it holds about a Member

The Light Cavalry will fully respect the new legislation but reminds Members that the low-level information gathered by the Light Cavalry is perceived by the Light Cavalry as the minimum needed to provide Members with the benefits of Light Cavalry Membership.

## **7. THE LIGHT CAVALRY WEBSITE**

This policy applies when members use the Light Cavalry website. This Policy is published on the site.

## **8. UPDATES**

Whenever this policy is updated a notice will be sent to Members.