



Data Protection Policy

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Horse Rangers Association (Hampton Court) Limited

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Definitions

Charity	Referring to the Horse Rangers Association (Hampton Court) Ltd, a registered charity.
GDPR	The General Data Protection Regulation 2016.
Responsible Person	Laura Griffith is responsible for data protection within the Charity.
Data Controller	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
Data Subject	Any living individual who is the subject of personal data held by an organisation.
Record of Processing	This is a register of all systems or contexts in which personal data is processed by the Charity.
Personal Data	Defined as any information relating to an identified or identifiable natural person ('data subject'); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological mental, economic, cultural or social identity of that person.
Special Categories of Personal Data	This is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and the processing of genetic data, biometric data for uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Data Protection Principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

Data Subjects' Rights

Data subjects have the following rights regarding data processing, and the data that is recorded about them:

- To make subject access requests regarding the nature of information held and to whom it has been disclosed
- To prevent processing likely to cause damage or distress
- To prevent processing for purposes of direct marketing

- To be informed about the mechanics of automated decision-taking process that will significantly affect them
- Not to have significant decisions that will affect them taken solely by automated process
- To sue for compensation if they suffer damage by any contravention of the GDPR
- To act to rectify, block, erased, including the right to be forgotten, or destroy inaccurate data
- To request the ICO to assess whether any provision of the GDPR has been contravened
- The right for personal data to be provided to them in a structure, commonly used and machine-readable format, and the right to have that data transmitted to another controller
- The right to object to any automated profiling without consent

Data subjects may make data access requests by contacting the HRA Office at admin@horserangers.org.uk. HRA will ensure that its response to the data access request complies with the requirements of the Regulation.

General Provisions

This policy applies to all personal data processed by the Charity.

The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.

This policy shall be reviewed at least annually.

The Charity shall register with the Information Commissioner's Office as an organisation that processes personal data.

Lawful, Fair and Transparent Processing

To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Record of Processing.

The Record of Processing shall be reviewed at least annually.

Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

Lawful Purposes

All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.

The Charity shall note the appropriate lawful basis in the Record of Processing.

Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data ie. Enrolment Forms and Application Forms.

Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

Data Minimisation

The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. Personal data for members is held by the Charity and, with their agreement, this data is used for communication purposes with members.

Accuracy

The Charity shall take reasonable steps to ensure personal data is accurate. Where necessary for the lawful basis on which data is processed, steps should be put in place to ensure that personal data is kept up to date.

Additionally, members are regularly requested to update their preferences and keep their personal data up to date.

Archiving / removal

To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.

The archiving policy shall consider what data should/must be retained, for how long, and why.

Security

The Charity shall ensure that personal data is stored securely using modern software that is kept up to date.

Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.

When personal data is deleted, this should be done safely such that the data is irrecoverable.

Appropriate back-up and disaster recovery solutions shall be in place.

Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

END OF POLICY