

TRAINER PRIVACY NOTICE

Summary of how we use your data

- The British Horseracing Authority uses the data you provide in this form and any attachments, and that you might provide at other occasions, such as during a stable inspection or in response to enquiries, to administer your licence or permit application, administer and regulate horseracing in Great Britain and to ensure the safety and welfare of your horses and staff.
- The British Horseracing Authority may also gather information about you from third party sources, particularly in relation to our integrity activities. More details on the information we collect from third party sources such as the public, the media and publicly available information, BHA and racecourse officials, the press and bookmakers are set out in the [Integrity Privacy Notice](#) (available on the BHA website).
- The British Horseracing Authority asks you to provide information in relation to your unspent criminal records history. This information will be processed to ensure the integrity of the sport, and we will be entitled to retain this information for this purpose.
- The British Horseracing Authority may share information relating to you with foreign racing authorities in relation to your licence or permit history. Some of these authorities may be located outside of the European Economic Area. We may also share information we receive from or about you with other third parties as set out in more detail below.

What does this policy cover?

This policy describes how the British Horseracing Authority Limited (also referred to as "the BHA", "we" or "us") will make use of data provided to it by and about trainers, particularly as part of the licence or permit application process. It does not describe the processing carried out by the BHA in relation to its integrity activities, which are covered in the [Integrity Privacy Notice](#) (available on the BHA website).

This policy also describes your data protection rights, including a right to object to some of the processing which the BHA carries out. More information about your rights, and how to exercise them, is set out in the "What rights do I have?" section.

What information do we collect?

We collect and process personal data about you when you complete your initial licence or permit application and subsequent renewals and also when you register any non- training services pursuant to the Rules of Racing. This includes all the information you provide to us in the application forms and in any attachments submitted alongside the form.

We may also generate information about you in order to help you complete your applications and help regulate and manage horseracing and ensure your welfare. In particular, we may hold and use information on whether you need particular assistance with completing your applications, on stable inspection reports and on stewards' reports.

What information do we receive from third parties?

Sometimes, we receive information about you from third parties. In particular:

- we may receive information about you from foreign racing authorities in relation to your licence, permit or registration history and conduct;

- we may receive information about you from training providers in relation to both your own training and that of your employees and any safeguarding concerns or investigations;
- we may receive information about you from our member organisations in relation to any safeguarding concerns or investigations;
- we may receive information about you from Racing Welfare in relation to any safeguarding concerns or investigations;
- we receive information about you from our appointed awarding organisation in relation to your qualifications;
- we may receive information about you from other licensed, registered or permitted personnel;
- we may seek information about you and your suitability and requirements for licensing or permit from publicly available sources, such as through internet searches and director checks;
- we may receive information about your performance and conduct from racecourses and BHA and racecourse officials;
- we may collect some information for integrity purposes from a variety of sources such as the public, the media and publicly available information, the press, bookmakers and the stewards– this is discussed in more detail in the [Integrity Privacy Notice](#) (available on the BHA website).

How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

- As required by the BHA to conduct our business and pursue our legitimate interests, in particular:
 - we will use your information to process your application for a new or renewed licence or permit and ensure your suitability and requirements for licensing in accordance with measures we take to ensure the integrity of the sport;
 - we use your criminal records data, provided as part of the licence or permit application, to ensure the integrity of the sport;
 - we will contact you in relation to any rules or other information you may require as a licensed or permitted trainer;
 - we will maintain records of horseracing results and share results with third party publishers of results;
 - we will monitor compliance with the Rules of Racing to ensure that breaches of the Rules are upheld and sanctioned (for more details, see our [Integrity Privacy Notice](#));
 - we will use data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation); and
 - we use data of some trainers to invite them to take part in industry research.
- Where you give your consent:
 - in other circumstances where we rely on your consent, and have explained the use of data at that time, including email marketing as set out in the trainer licence or permit application.
- For purposes which are required by law:
 - in response to requests by government or law enforcement authorities conducting an investigation, including the Gambling Commission.

Relying on our legitimate interests

We have carried out balancing tests for all the data processing we carry out on the basis of our legitimate interests, which we have described above. You can obtain information on any of our balancing tests by contacting us using the details set out later in this notice.

Withdrawing consent or objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes. You have an absolute right to opt- out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic marketing message, or by contacting us using the details set out below.

Who will we share this data with, where and when?

We will share your information with foreign racing authorities when you wish to participate in horseracing in a different jurisdiction or in order that they may contact you to request your assistance in an investigation. Some of these authorities may be located outside of the European Economic Area.

We will share your information with Weatherbys Limited, our data processor, who administer our racing database and provide racing related services to the BHA.

We will share your information with training providers in relation to your training and any safeguarding concerns or investigations.

We will share your information with Racing Welfare in relation to any safeguarding concerns or investigations.

We will share your information with our member organisations in relation to any safeguarding concerns or investigations.

We will share limited information with other licensed, permitted or registered personnel in relation to your standing as a trainer.

We will share your information with Jockey Club Estates in relation to your use of their training facilities.

We will share your information with the Point to Point Authority, where necessary, to assist with their regulated activities.

We will share your information with the National Trainers' Federation ("NTF") so that they can represent your interests as a licensed or permitted trainer. They will also use this information for the administration of the Racing Industry Accident Benefit Scheme (RIABS), the Stable Employees Life Assurance Scheme and the Stable Employees' Pension Plan. More details on how the NTF handle your information can be sought directly from the NTF.

We will share information with the RCA and/ or racecourses in relation to entries, including any integrity concerns.

We will share your information with Great British Racing Limited to assist them in validating your details where you nominate an owner to join the GBRI Members' Club.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on behalf of the BHA for the purposes identified above. Such third parties include providers of website and system hosting for our licensing teams.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately

May 2018

protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review on request.

What rights do I have?

You have the right to **ask us for a copy** of your personal data; to **correct, delete or restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format** and to ask us to **share (port) this data to another controller**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, or to obtain other information, such as a copy of a legitimate interests balancing test, you can get in touch with us – or our data protection officer – using the details set out below. If you have unresolved concerns, you have the **right to complain** to an EU data protection authority where you live, work or where you believe a breach may have occurred. This is likely to be the Information Commissioner's Office in the UK.

How do I get in touch with you, or your data protection officer?

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt out of direct marketing, you can get in touch at dataprotection@britishhorseracing.com or by writing to either the Head of Legal or Data Protection Officer c/o British Horseracing Authority, 75 High Holborn, London, WC1V 6LS.

How long will you retain my data?

Where we process licence and permit application data and stable inspection reports, we do this for as long as you hold a trainer's licence or permit and for ten years after this. We retain top level data recording your name, date of licence/ permit and licence/ permit type indefinitely in order to keep a record of the sport.

Where we maintain records of racing results, we hold this information indefinitely in order to keep a record of the sport.

Where we hold case files in relation to breaches of the Rules of Racing by registered, licensed or permitted personnel, we hold these for the period of the investigation plus twenty years from the date that the investigation is closed or for as long as you hold a licence, registration and/or permit (whichever the longer) so that we maintain adequate records in the event that you return to horseracing in the same or another registered or licensed profession or otherwise remain a person of interest under the Rules of Racing, by remaining connected to other licensed personnel.. In exceptional circumstances, we may retain case files for a longer period where the requirement for retention outweighs the requirement for deletion.

May 2018

We publish decisions of our Judicial Panel on our website- these remain for seven years from the date of the decision, or in the case of disqualifications lasting longer than seven years, for as long as the disqualification is in place. We retain the written reasons of the Judicial Panel and top level details of the decision indefinitely in order to keep a record of the sport.