

THE BDS DATA PROTECTION POLICY 2019

The British Driving Society (BDS) was formed in 1957 as a national organisation encouraging and supporting those who drive carriages. The BDS is involved with setting standards of safety, welfare and competence, in traditional harness horse driving activities. This policy sets out our commitment to protecting your personal data and how we implement that commitment with regards to the collection and use of personal data in accordance with the GDPR.

WHY DO WE COLLECT PERSONAL DATA?

We use data for administrative, legal, financial and communication purposes and receiving your payment for BDS goods and services, and sending these items to you.

We collect your personal data for the following purposes:

- Administration in relation to your BDS Membership
- Administration in relation to your Application for BDS Assessment.
- Processing your Application for, or amendments to, a BDS Horse Passport.
- Processing your purchase of any BDS Merchandise.
- Answering your enquiries
- Companies House Filing purposes if you become a Council Member.
- Communicating your position to relevant persons and organisations if you become an Official of the BDS.
- Administering and processing your entry to events organised centrally by the BDS.
- Communicating your success in events organised by the BDS and/or BDS Officials.
- Management of BDS communications being delivered to you.

HOW DO WE COLLECT PERSONAL DATA?

Normally, we collect your data by means of a BDS form, however some BDS goods and services do not require a form. We do not use any marketing services to collect your data.

WHAT DATA DO WE COLLECT?

Membership Data

- your title
- first and last name
- address
- telephone numbers
- email address
- date of application for Membership
- date your Membership expires
- BDS Area you are allocated to
- date of birth if you are a Junior Member
- your payment method
- the amount of your Membership fee
- name of payee where this is different from the name of the applicant
- any information which you have asked us to record as relevant to your BDS Membership.
- Direct debit mandate information

Horse Passport Data

- your title
- name
- address
- telephone number
- email address
- the amount you have paid
- name of payee if this is different from the applicant
- DEFRA required information about the equine.

BDS Assessments

- your title
- name
- address
- telephone numbers
- email address
- date of birth (if under the age of 18)
- the amount you have paid
- the assessment you have paid for
- name of payee if this is different from the applicant
- the assessor and the date and venue of the Assessment
- the assessor's mark sheets
- any Certificate of Achievement, plus the date of issue and issue number
- health related data if a 'reasonable adjustment' is applied for

BDS Merchandise

If you purchase a product via the BDS Office, then we collect and store your name, address and payment details. If you make a purchase from the BDS Information Stand and ask the Stand Manager to send your purchases by post, then we collect your name and address. We keep these details only for as long as it takes us to process your payment and to send you your purchases.

Enquiries

You may ask a question by post, email, telephone to the BDS Office, or in person by speaking to a BDS Official. We will store your name and contact details so that we are able to get back to you with the answer. We may have to refer your query to an appropriate BDS Official, or other person, agency or organisation, who will be able to provide an answer, if so we may need to send your details and question to them. If you DO NOT want us to share your personal contact details with anyone other than the BDS Office or BDS Official you have spoken to, please tell us at the point of enquiry.

Imagery

It is NOT illegal to take photographs of people at public events, and we are only responsible for how we use images taken by the BDS in our publications, website, social media and in BDS promotional material.

Images may be taken of adults and children when participating or attending BDS events, activities, shows, and classes, including classes at County Shows, Horse of the Year Show, and similar. Images may be photographs or video, with or without audio, and may be taken by BDS Officials, Show Officials, Professional Photographers, PR people, BDS Members, or by non-BDS Members.

Event Data

If you enter a BDS competition, event or class, we record your name, address, contact details, exhibitor details and entry details. If you are a show secretary applying for affiliation to the BDS we record your name, address, contact details, website address, show details, types of driving classes provided and payment details.

Training Providers

- your title
- name
- address
- telephone numbers
- email address
- website address
- level of coaching expertise
- qualifications and the expiry date of these (including carriage driving, coaching, safeguarding, and first aid)
- evidence of CPD, relevant insurance, and DBS checks
- date of approval as a BDS Coach

BDS Officials Data

- BDS position(s) held
- your title
- name
- address
- telephone numbers
- email address
- bank details

Financial Data

Cheques must be made out to THE BRITISH DRIVING SOCIETY LTD. When we receive a cheque in payment from you, we record the item or service for which you have paid, we enter the name of the payee, the amount, and what the payment is for on the bank paying-in form, which we keep for our records. We write your Membership Number on the back of the cheque, so we can trace it to you in the event that the bank returns it to us. We give the cheque and paying-in form to our bank, for paying into the BDS bank account. When we receive our bank statement, this records your name against the amount you have paid to us.

The BDS Office is able to take card payments between 10.00am and 4.00pm Monday to Friday (except for public holidays). You will be asked to give your name, and asked what services or item you wish to pay for. You will be told the amount payable. We will ask you to read out the long number on your debit or credit card, followed by the expiry date, and the 3 security numbers on the back of the card.

The operator will input this information directly into the BDS card machine whilst you are still on the telephone, and will confirm to you when payment has gone through. Only the BDS Office, the BDS Chairman and BDS Data Controller have access to the card machine. If we have any card payment details written down, we destroy these by shredding as soon as the payment has gone through.

If you wish to renew your Membership by Direct Debit Mandate, you will need to fill in a Direct Debit Mandate form. Direct Debit is only available for Membership Renewals. We must receive the Mandate in the BDS Office no later than 1st December, in order to be able to process it for payment by 31st December. We send your Direct Debit Mandate to your bank for processing. We keep a record of your bank, bank account, and sort code. Only the BDS Office staff, BDS Chairman and BDS Data Controller have access to your Direct Debit information.

WHERE DO WE STORE PERSONAL DATA AND WHO HAS ACCESS TO IT?

We take all reasonable measures to protect the personal data we hold from unauthorised use. We store your data on the BDS Office computer, which is password-protected and accessible at source only by BDS Office, the BDS Chairman, the Chair of Finance and Admin and BDS Data Controller. The Chair of the BDS Training Committee can access the Assessment data. The Show Director can access the Event Data.

Horse Passport data is stored on a separate BDS computer, password-protected and accessible at source only by the BDS Horse Passport Data Processor, the BDS Horse Passport Registrar and the BDS Data Controller. Some Horse Passport data is uploaded to the DEFRA Central Equine Database. Original applications for a BDS Horse Passport, original silhouettes, and horse identity information and change of detail forms, which you have sent to us, plus any correspondence we have had about your Horse Passport are either stored electronically or in hard copy at the BDS office. This enables us to verify the animal's identity if needs be.

Signed Applications for Membership and Renewal forms which you have returned to us are securely stored in the BDS Office. Application for BDS Assessment forms which you have sent to us plus the mark sheets which record the results of your tests, copies of the Certificates which we have issued are securely stored in the BDS Office

WHO DO WE SHARE YOUR DATA WITH AND FOR WHAT PURPOSES?

We share Membership data with:

- BDS Council when you first join the BDS as a New Member, as per Article 2.5 of the BDS Articles of Association. Every new Member has to be ratified by Council.
- your local BDS Area Commissioner (AC), to enable them to contact you about BDS events, activities and news in your BDS Area
- your local Branch Chairman if you live in Northern Ireland, Scotland or Wales – for the purposes of communicating with you about local events, activities and news.
- BDS Committee Chairs to enable them to contact you about BDS services and events.
- Information collected in relation to a BDS competition, event or class, will be shared with the Show/Event organisers, so they can contact you for administration purposes.
- We DO share your personal information with authorised suppliers to the BDS:
 - the BDS Insurance company to confirm whether your BDS Public Liability Insurance is valid if there is a claim
 - the BDS printers so they can send BDS publications to you.

- BDS Publication Editors
- Our financial processing bureau who process our direct debit payments
- the BDS bank in order to receive your payment
- BDS legal team for legal purposes

BDS Officials Data

- If you tell us you are prepared to occupy any BDS Official position – ie: BDS Council Member, Committee Member, Assessor, Training Provider, Judge, Branch Chairman, Area Commissioner, Assistant Area Commissioner, Rights of Way Officer, etc, then your name and some contact details are shared with BDS Publication Editors for communications purposes to enable BDS Members to contact you.
- If you are a BDS Judge then your name and some contact details will be shared with Show Organisers.
- If you become a BDS Council Member then your name, address, date of birth and contact details will be shared with the BDS Accountant for the purposes of being filed at Companies House.
- BDS Accountant for bookkeeping and accounting purposes

We share data with the BDS Assessor and/or the Assessment Centre for the purposes of verifying your identity on the day of the test and so they can liaise with you direct to arrange date, time and venue and notify you if there are any last minute changes.

We share Horse Passport data with DEFRA and Central Equine Database (CED).

We share financial data with the BDS bank and Council Members are also required to provide information about their bank details and a signature to the BDS bank for the purposes of preventing fraud.

HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

Membership data is kept for 8 years for insurance purposes.

Direct Debit payment details are kept for 12 months, to enable us to collect payment for the next year.

Assessment Data is retained by us for your lifetime, in order that we are able to confirm to you, or to any authorised person or organisation for the purposes of Insurance, Local Authority Licence, Police, Health & Safety Executive, Trading Standards, or similar, that you hold a BDS Certificate of Competence. You may also authorise us to provide such information to a prospective employer.

Horse Passport Data is retained until we are notified of the death of the horse, or for 33 years if we have no notification of the horse's death.

Financial records are kept for 7 years, for tax purposes.

We retain your name, contact details and query for as long as it takes us to reply to your query or where correspondence about a subject is on-going, or recurrent, we will keep your correspondence on file for future reference.

REMOVING YOUR DATA – RIGHT TO BE FORGOTTEN

The GDPR gives you the right, in certain cases, to have your personal data erased from our records. There are legal exceptions.

If you tell us in writing/email that you wish to resign your annual Membership before the expiry date of 31st December, or if you do not renew your annual Membership by 31st May in any year, then we will remove your data from the Membership Database. We keep your name and address for 8 years on an ex-Members' Database so we can confirm your BDS membership to the BDS Insurance company if there is a claim against you. If you tell us in writing/email that you wish for your data deleted from our Ex-Membership Database, then we will remove you from our records but this could result in you being unable to rely upon the BDS Members' Insurance.

You cannot ask us to erase your Assessment data, as we are legally obliged to retain this for your lifetime.

You cannot ask us to erase your personal data from BDS Horse Passports or the BDS Horse Passport Database, as we are legally obliged to retain this until we are notified of the death of the horse, or for 33 years if we are not notified of the horse's death.

If you ask us to delete/destroy your written or emailed correspondence, then we will do so.

REGISTRATION AND REGULATION

The BDS is registered with Companies House, Limited by Guarantee, Company Registration No: 04612597.

The BDS is registered with the Information Commissioner's Office. Registration No: Z8010141. Regulators for the General Data Protection Regulations legislation.

The BDS is registered with the Department for Transport (DfT), as the sole Awarding Organisation for the Code of Practice Certificates for Drivers of Commercial Horse Drawn Vehicles on the Public Highway, for the purposes of enabling them to obtain Local Authority licences to either operate as Hackney Carriages or horse drawn Omnibuses, or as Private Vehicle Hire providers.

The BDS is a DEFRA Registered Horse Passport Issuing Organisation (PIO). DEFRA Registration No: 826049 for the purposes of issuing Horse Passports.