

MULLINGAR EQUESTRIAN CENTRE LTD

PRIVACY POLICY

Mullingar Equestrian Centre Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in a way, that is consistent with our obligations and your rights under the law.

1. Information About Us

Company Name: Mullingar Equestrian Centre Ltd.

Registered address: Rathcolman, Mullingar, Co Westmeath, Ireland N91 X456

CRO number: 178959

VAT number: IE6578959D

Email address: info@mullingarequestrian.com

Telephone number: +353 4493 48331

2. What Does This Notice Cover?

This Privacy information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.

- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way Part 6 explains more about how we use your personal data, including automated decision-making and/or profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Data Protection Commissioner's Office or your local Citizens Information Centre.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Data Protection Commissioner's Office.

5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Address;
- Email address;
- Telephone number;
- Mobile Number;
- Business name;
- Information about your preferences and interests;

6. Systems used to gather data:

Mullingar Equestrian Centre gathers information directly from you and also via our websites and other technical systems. These may include, for example:

- computer networks and connections
- websites – MullingarEquestrian.com
- email, letters, faxes and other printed forms
- telephones, voicemail, mobile phone records
- social media and direct/instant messaging

Cookies - When you use our websites we may gather information about you through cookies and other technical means. 'Cookies' are text files placed on your computer to collect Internet log information and user behaviour information. These are used to track website usage and monitor website activity and for other data processing reasons set out below.

7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you, and successfully process entries made by you for auction or to process purchases made by you at one or more of our auctions

- disclosures and exchange of information (to process entries made by you for auction)
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and/or post that you have opted-in to (you may unsubscribe or opt-out at any time by either; email - click on unsubscribe in the footer of the email or reviewing your newsletter subscriptions on IrishSportHorseAuctions.com, postal - please contact us using the details provided in Part 11)
- compliance with legal, regulatory and corporate governance obligations and good practice
- gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests
- operational reasons, such as providing information to you about Mullingar Equestrian Centre auctions and its activities and undertakings
- security vetting, investigating complaints and allegations of criminal offences
- statistical analysis
- to allow you to participate in interactive features included on our website

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

8. How Long Will You Keep My Personal Data?

The Company shall not keep personal data for any longer than is necessary in light of the purposes for which that data was originally collected and processed. When the data is no longer required, all reasonable steps will be taken to erase it without delay.

Data Disposal

When the data is no longer required or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:

- Personal data stored electronically (including any and all backups thereof) shall be deleted securely
- Personal data stored in hardcopy form shall be shredded

9. How and Where Do You Store or Transfer My Personal Data?

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data protection laws that are as strong as those in Ireland and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within Ireland and under the GDPR as follows.

10. Do You Share My Personal Data?

We may sometimes contract with the following third parties to supply products or services to you on our behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold, eg

- Encrypted payment portal
- Various delivery services, eg postal service

- Auction partners – in order to process your auction entries and transfer ownership of animals

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within Ireland and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of two months from the date we receive your request. You will be kept fully informed of our progress.

12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details;

Email address: info@mullingarequestrian.com | Telephone number: +353 4493 48331

Postal Address: Rathcolman, Mullingar, Co Westmeath, Ireland N91 X456.

13. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on www.mullingarequestrian.com.

April 2020