



PRESTIGE EQUESTRIAN PRIVACY POLICY

8th December 2025
Version 2



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DOCUMENT CONTROL

Policy Title	Privacy Policy
Policy Purpose	To explain how Prestige Equestrian collects, uses, stores, shares and protects personal information in line with UK GDPR, data protection law, and its duty of care as an equestrian training and events provider.
Author	Helen Gallop – Managing Partner
Scope	All staff, contractors, instructors, volunteers and partners handling personal data on behalf of Prestige Equestrian.
Responsibility	The Company Director / Data Protection Lead
Legal Context	UK General Data Protection Regulation (UK GDPR) Data Protection Act 2018 Health and Safety legislation Insurance and duty of care obligations ICO CCTV Code of Practice
Review / evaluation	This policy will be reviewed annually, or earlier where there are significant legal, operational or regulatory changes. Next review due: January 2027 . Any person making alterations must clearly record and indicate all changes between the previous and revised versions.
Approval	This policy is approved and reviewed by the Company Director/Owner as part of Prestige Equestrian’s governance, risk management and information management responsibilities.
Change History	Version1 - 04/22/24: New Document created by Helen Gallop Version 2 – 08/12/2025 - Updated to fully reflect Prestige Equestrian’s current operations as an equestrian training and events provider operating within a risk sport - Expanded and clarified the categories of personal data collected, including rider registration, safety, risk and health-related information - Introduced a detailed lawful basis framework, including a summary table and explicit justification for special category data - Added clear transparency around data storage systems, third-party booking platforms, data sharing, retention periods and international transfers - Introduced a comprehensive CCTV and audio recording section, including animal welfare purposes and compliance with ICO guidance



POLICY STATEMENT

Prestige Equestrian (“Prestige”, “we”, “us”) provides equestrian training, coaching, events, and related services. We are committed to protecting the privacy and rights of riders, clients, event participants, staff, volunteers, and professionals who engage with our services.

This Privacy Policy explains how we collect, use, store, and share personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Because equestrian activity is a risk sport, we collect and process certain personal information to support rider safety, appropriate instruction, risk management, and emergency planning. All personal data is processed lawfully, fairly, and transparently, with appropriate security measures in place.

Where children or young people participate in training or events, their personal data is handled with additional care and confidentiality, and access is restricted to those who need it to deliver safe and appropriate services. We do not use children’s personal data for marketing or profiling.

We collect and process personal information only where it is necessary to deliver safe, appropriate, and effective equestrian training or services. We follow the principle of data minimisation, ensuring that no more information is collected or retained than is required for its intended purpose.

Prestige Equestrian does not use personal data for automated decision-making or marketing profiling. Personal data is never sold and is shared only with trusted third parties where necessary and lawful.

If you have any questions about how your personal data is handled, or wish to exercise your data protection rights, please contact our Data Protection Lead Helen Gallop:

Email: enquiries@prestige.training

Phone: 01452 720288



PERSONAL DATA WE COLLECT

INFORMATION ABOUT RIDERS AND PARTICIPANTS

We collect only the information necessary to deliver **safe, appropriate and effective equestrian training, coaching, events and related services**. Because equestrian activity is a **risk sport**, certain additional details are required to support rider safety, appropriate instruction and emergency planning.

This may include:

- Name, date of birth, and contact details
- Height and weight (where relevant to rider safety or equipment suitability)
- Emergency contact name(s) and telephone number(s)
- Riding history, experience and discipline(s)
- Frequency of riding and riding goals
- Relevant injury history or physical considerations where voluntarily disclosed
- Booking, registration and attendance records
- Risk assessment information relating to participation
- Where children or young people participate, their information is handled with **additional care and confidentiality**, and access is restricted to those who require it to deliver safe provision.

SPECIAL CATEGORY AND HEALTH-RELATED INFORMATION

In limited circumstances, riders may choose to disclose health-related or physical information that is relevant to safe participation (for example, injuries, medical considerations or access needs).

Where such information is provided:

- It is processed only where necessary for safety or risk management
- Access is strictly limited
- It is never used for marketing or profiling
- It is handled in line with UK GDPR requirements for special category data



PHOTOGRAPHS, AUDIO AND VIDEO

We may collect photographs or short video recordings where necessary for:

- Training feedback or coaching purposes
- Event administration or operational records
- Safety or incident review

Such media is **not used for marketing, publicity or social media** without **separate explicit consent** from the rider, or from a parent or guardian where the participant is under 18.

INFORMATION ABOUT PARENTS, GUARDIANS AND RESPONSIBLE ADULTS

Where a rider is under 18, or where a parent or guardian is responsible for bookings or consent, we may collect:

- Names, addresses and contact details
- Emergency contact information
- Consent and authorisation details
- Relevant background information required to support safe participation

INFORMATION ABOUT PROFESSIONALS AND ORGANISATIONS

Where we work with coaches, officials, venues, insurers or partner organisations, we may collect:

- Names and professional contact details
- Role or organisational information
- Relevant administrative or contractual information

WEBSITE AND TECHNICAL INFORMATION

When you use our website, we may collect limited technical information including:

- IP address
- Device and browser type
- Pages visited and interactions with the site
- Cookies and preference settings
- Form submissions

We may collect limited location information derived from IP addresses to help secure our website and monitor performance. This information does **not** identify individuals and is not used for tracking or profiling.



HOW WE USE PERSONAL DATA

We process personal data in order to:

- Deliver equestrian training, coaching, events and related services
- Assess rider suitability and plan appropriate instruction
- Manage rider registration, bookings and attendance
- Maintain risk assessments, safety records and incident logs
- Support rider safety, welfare and emergency planning
- Communicate with riders, parents, guardians and relevant professionals
- Respond to enquiries and provide customer support
- Manage billing, finance and audit requirements
- Meet legal, health and safety, insurance and reporting obligations
- Protect the safety and wellbeing of riders, staff and horses
- Improve our website and services through analytics (where consent is given)

Prestige Equestrian **never sells personal data** and does not use personal data for marketing profiling or automated decision-making.

OUR LEGAL BASES FOR PROCESSING

Depending on the context and nature of the service, we rely on the following lawful bases under UK GDPR:

- **Contract** – where processing is necessary to deliver training, events or services requested by a rider or booker
- **Legitimate Interests** – to operate our services safely and effectively, respond to enquiries, and manage risk
- **Legal Obligation** – to comply with health and safety law, insurance requirements, financial and tax regulations
- **Vital Interests** – where processing is necessary to protect someone's life or physical safety in an emergency
- **Consent** – only where required, such as for marketing communications, optional photography, or analytics cookies

We select the most appropriate lawful basis for each processing activity and document this where required.



SPECIAL CATEGORY DATA

In limited circumstances, we may process **special category personal data**, such as health-related or physical information relevant to rider safety.

Where this occurs, we rely on one or more of the following lawful bases:

- **Explicit consent** – where riders voluntarily provide relevant health or physical information
- **Vital interests** – where information is required to protect a rider or others from serious harm
- **Substantial public interest** – under the Data Protection Act 2018 (Schedule 1), where processing is necessary for health and safety, safeguarding of children or individuals at risk, or the safe provision of sporting activities

Such data is handled with enhanced confidentiality, restricted access and appropriate security measures.

CCTV AND AUDIO RECORDING

Prestige Equestrian operates closed-circuit television (CCTV) systems across its site for the purposes of safety, security, animal welfare and incident management.

CCTV is used to help ensure that:

- Horses and other animals on site are safe, appropriately supervised and cared for
- Animals are **handled and treated correctly** by staff, riders and visitors
- Horses are present in the **correct locations** and managed in line with welfare expectations
- Some CCTV systems may include **audio recording** in specific locations where this is necessary and proportionate to support safety, security, animal welfare or incident investigation.

PURPOSE OF CCTV USE

CCTV (and where applicable, audio recording) is used to:

- Promote the safety of riders, staff, visitors and horses
- Protect property and facilities
- Deter and detect crime or unsafe behaviour
- Support investigation of accidents, incidents or complaints
- Assist with insurance, legal or regulatory requirements

CCTV is **not used** for routine staff monitoring, performance management, or marketing purposes.



LAWFUL BASIS FOR CCTV PROCESSING

CCTV footage (and any associated audio) is processed under the following lawful bases:

- **Legitimate interests** – maintaining site security and safety in a risk environment
- **Legal obligation** – meeting health and safety and duty of care requirements
- **Vital interests** – where footage is required to protect life or physical safety

Audio recording is used only where it is **necessary and proportionate** for these purposes.

ACCESS, STORAGE AND RETENTION

- CCTV recordings are stored securely with restricted access
- Access is limited to authorised individuals with a legitimate need
- Footage is retained for a **limited period** and deleted unless required for investigation, insurance or legal purposes
- Where footage is required for an incident or claim, it may be retained for longer in line with our retention policy

TRANSPARENCY AND SIGNAGE

Clear signage is displayed across the site to inform individuals that CCTV (and where applicable, audio recording) is in operation.

YOUR RIGHTS IN RELATION TO CCTV

Individuals have the right to:

- Request access to CCTV footage in which they appear
- Request deletion of footage, where lawful and appropriate

Requests are handled in line with data protection law, and we may need to obscure or redact third-party images to protect others' privacy.

LAWFUL BASIS TABLE

Purpose of Processing	Lawful Basis	Notes
Delivering equestrian training, coaching and events	Contract	Processing is necessary to deliver services requested by riders or bookers.
Rider registration, safety planning and risk assessment	Contract / Legitimate Interests	Essential to ensure safe participation in a risk sport.
Safeguarding, incident management and emergency response	Legal Obligation / Vital Interests	Required to meet duty of care and protect life or physical safety.
Processing health or physical information relevant to riding	Explicit Consent / Vital Interests / Substantial Public Interest	Limited to what is necessary for safety and risk management.
Communication with riders, parents and guardians	Legitimate Interests	Necessary for safe and effective service delivery.
Finance, invoicing and audit	Legal Obligation	Required for tax, accounting and financial compliance.
Website analytics	Consent	Analytics cookies are used only where consent is given.
Site security, safety, animal welfare and incident management (CCTV and audio recording)	Legitimate Interests / Legal Obligation / Vital Interests	Used to protect riders, staff, animals and property; footage is accessed only where necessary and retained for limited periods.



HOW WE STORE YOUR INFORMATION

We store personal information securely using a combination of technical safeguards, trusted service providers, and controlled access procedures.

We use the following systems and measures:

- SiteGround – secure website hosting and databases for <https://prestige.training>
- Forminator – secure collection and storage of form submissions, including enquiries and registrations
- Ultimate Member – secure management of rider registration and user account information
- Microsoft OneDrive – encrypted cloud storage for administrative, operational, and safety-related records
- Password protection and encryption across systems where available
- Two-factor authentication on key accounts and services
- Role-based access controls, ensuring personal data is accessible only to authorised individuals
- Audit and activity logs where supported by systems
- Regular system updates and security monitoring

Access to personal data is restricted to those who require it to deliver services safely, manage bookings, respond to enquiries, or meet legal and insurance obligations.

All individuals with access to personal data are expected to understand and follow our data protection responsibilities.

WHERE WE STORE PERSONAL INFORMATION

We store personal information using secure systems and reputable service providers, as follows:

- **Prestige Equestrian website submissions:** stored on **SiteGround** servers located in the UK and/or EU
- **Rider registration and user account data:** stored within **Ultimate Member** on our SiteGround-hosted website
- **Operational and administrative documents:** stored on **Microsoft OneDrive**, using encrypted cloud storage
- **Emails and communications:** stored within **Microsoft Office 365** secure email systems



THIRD-PARTY BOOKING AND MANAGEMENT PLATFORMS

In order to book and manage certain riding activities, events or lessons, riders may be required to use third-party booking platforms. These platforms operate independently from Prestige Equestrian and have their **own privacy policies and terms of use**.

The platforms we use include:

- **My Riding Life** (<https://www.myridinglife.com>)
Used by riders to register for and manage entries for events at show centres. Riders must create an account directly with My Riding Life in order to use this service.
- **Versum** (<https://prestigettraining.versum.com>)
Used to manage lesson bookings, schedules and tuition-related administration. Riders register and manage their booking information directly within the Versum system.

Where riders choose to use these services:

- Personal data is provided **directly by the rider** to the third-party platform
- Prestige Equestrian accesses only the information necessary to manage bookings, schedules or participation
- Each platform acts as an **independent data controller** for the information held within its system

We encourage riders to review the privacy policies of these platforms to understand how their personal data is processed.

INTERNATIONAL DATA TRANSFERS

Some third-party service providers, including Microsoft and booking platforms, may store or process personal data outside the UK or European Economic Area.

Where international transfers occur, appropriate safeguards are in place, including: **UK International Data Transfer Agreements (IDTAs)**, or **Standard Contractual Clauses (SCCs)**, and GDPR-compliant contractual protections



SHARING YOUR INFORMATION

We share personal information only where it is necessary, lawful, and proportionate.

EXTERNAL PROCESSORS (ACTING ON OUR BEHALF)

These organisations process personal data solely to support our operations and only in accordance with our instructions:

- **SiteGround** – website hosting and secure databases
- **Microsoft OneDrive** – encrypted cloud storage
- **Ultimate Member** – user account and rider registration management
- **Forminator** – secure form submissions
- **Google Analytics** – website analytics (used only where consent is given)
- **Email service providers** – communication and administration
- **IT support providers** – operating under confidentiality and data protection agreements

All processors are required to implement appropriate technical and organisational security measures and to process personal data in compliance with UK GDPR.

OTHER DATA CONTROLLERS (WHERE NECESSARY)

In some circumstances, we may share personal information with other organisations that act as **independent data controllers**, including:

- **Third-party booking platforms**, such as **My Riding Life** and **Versum**, where riders choose to use those services
- **Event venues or show centres**, where information is required to manage entries or participation
- **Insurers or legal advisers**, where required for claims, incidents or compliance
- **Medical or emergency services**, where necessary to protect life or physical safety
- **Regulatory or law enforcement bodies**, where required by law

Information is shared only to the extent necessary for the relevant purpose.

NO SALE OR TRADING OF DATA

Prestige Equestrian does **not** sell, rent or trade personal data to third parties for marketing or commercial purposes.



SAFEGUARDING & SPECIAL CATEGORY INFORMATION

As an organisation delivering equestrian training and activities within a **risk sport**, Prestige Equestrian applies enhanced confidentiality controls and access restrictions to all safety-related, wellbeing and risk information.

Only authorised individuals with a legitimate operational need may access such records, and access is strictly limited to what is necessary for safety, instruction, emergency response or compliance purposes.

Prestige Equestrian may process sensitive or special category information where necessary to:

- Protect the safety and wellbeing of riders, staff, horses or others
- Enable appropriate instruction, supervision and risk management
- Respond to accidents, incidents or medical emergencies
- Meet legal, insurance, health and safety or regulatory requirements
- Safeguard children and young people where they participate in activities

Where children or young people are involved, their information is handled with **additional care and confidentiality**, and is never used for marketing, profiling or unrelated purposes.

All processing of special category or safety-critical information is **lawful, proportionate, securely managed**, and carried out in line with Prestige Equestrian's duty of care.



YOUR RIGHTS UNDER UK GDPR

Under the UK General Data Protection Regulation, you have the right to:

- **Access** the personal information we hold about you
- **Request correction** of inaccurate or incomplete information
- **Request erasure** of your personal data (this is not an absolute right)
- **Request restriction** of processing or **object** to processing in certain circumstances
- **Request data portability**, where applicable
- **Withdraw consent**, where consent is the lawful basis for processing

Some rights may be limited where processing is necessary to:

- Meet legal, health and safety, insurance or regulatory obligations
- Maintain records relating to incidents, accidents or risk management
- Protect the safety and wellbeing of riders, staff or others

We will respond to all valid requests within the timescales set out in data protection law.

RETENTION PERIODS

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, including legal, safety, insurance and operational requirements. Retention periods are reviewed regularly and applied consistently.

The following retention periods apply:

- **Rider registration, booking and participation records** – retained for **6 years** after the last activity
- **Risk assessments, incident and accident records** – retained for **6 years** after the incident, or longer where required for insurance or legal purposes
- **Health or safety-related information** (where provided) – retained only for as long as necessary to manage risk and meet duty of care obligations
- **Financial and invoicing information** – retained for **6 years** in line with HMRC requirements
- **Lesson and tuition records (including schedules and attendance)** – retained for **6 years** after last contact
- **General enquiries** – retained for **12 months**
- **Website analytics data** – retained for **26 months**

Where children or young people participate, certain records relating to safety or incidents may be retained for a longer period where necessary to meet legal or insurance obligations.



HOW TO CONTACT US

For questions or requests about this policy you can apply in writing via email at enquiries@prestige.training

COMPLAINTS

We aim to resolve any concerns **quickly and fairly**.

If you wish to raise a complaint about how your data has been handled, please contact us in writing:

Data Protection Lead

Helen Gallop

Email: enquiries@prestige.training

We will acknowledge your concern and provide a full written response within **one calendar month**, in line with UK GDPR.

For complex matters, we may extend this by up to **two additional months**, but we will always inform you.

If you remain dissatisfied, you may contact the Information Commissioner's Office (ICO):

Information Commissioner's Office

Website: <https://ico.org.uk>

Telephone: 0303 123 1113