



# Rainbow Horses

## Learning Centre CIC

### PRIVACY POLICY

#### **BACKGROUND:**

Rainbow Horses Learning Centre CIC 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 families 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**

Rainbow Horses Learning Centre CIC.

Registered in England under company number 07493737.

Registered address: 7 Top Road, Ruddington, Nottingham NG11 6HQ.

Operating address: Langar Lane, Harby LE14 4BL.

Data Protection Officer: Sarah Rice.

Email address: [sarah.rice@rainbow-horses.co.uk](mailto:sarah.rice@rainbow-horses.co.uk).

Telephone number: 07732 334451

Postal Address: Rainbow Horses Learning Centre, Langar Lane, Harby LE14 4BL

#### **2. What Does This Policy 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:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy 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.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) 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.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) 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.

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 Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information 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;
- Child(ren)'s name,
- Child(ren)'s date of birth;
- Child(ren)'s diagnosis/health issues;
- Address;
- Email address;
- Telephone number;
- Other details as necessary to allow us to work with your child(ren) effectively.

6. **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 will be used for the following purposes:

- Providing Equine Facilitated Therapeutic Learning sessions for your child(ren)
- Letting you know about events that we may be running
- Communicating with you. This may include responding to emails or calls from you.

7. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- 3 years after your child's last session at Rainbow Horses Learning Centre CIC;

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

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

The security of your personal data is essential to us and to protect your data, we take a number of important measures, including the following:

- all paper data is kept in a locked filing cabinet.
- electronic data is stored in an encrypted file on a business laptop or on a secure software platform

9. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties unless you request that we share information, subject to one important exception.

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.

10. **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 11.

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 2 weeks and, in any case, not more than one month of receiving it. 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 three months from the date we receive your request. You will be kept fully informed of our progress.

#### 11. **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 (for the attention of Sarah Rice):

Email address: [sara.rice@rainbow-horses.co.uk](mailto:sara.rice@rainbow-horses.co.uk)

Telephone number: 07732 334451.

Postal Address: Rainbow horses Learning Centre Langar Lane,  
Harby, Melton Mowbray LE14 4BL

#### 12. **Changes to this Privacy Policy**

We may change this Privacy Policy 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 our website [www.rainbowhorses.co.uk](http://www.rainbowhorses.co.uk).

#### 13. **What Happens in the Event of a Personal Data Breach**

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes.

If this occurs, and it is likely that the breach poses a risk to an individual's rights and freedoms, Rainbow Horses Learning Centre will complete the self assessment tool on the Information Commissioner's Office website <https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach-assessment/>

If the assessment shows that the data breach poses a significant risk then the Data Protection Officer will notify the ICO without undue delay, and at the latest within 72 hours after having become aware of the breach.

If the data breach poses a high risk to those individuals affected then they will also be informed, unless the protection measures that we have already put in place, ensure that the risk is no longer likely to materialise.

#### 14. **Staff Training**

All staff will complete the GDPR training available to them through the TES Develop Online Training package that Rainbow Horses Learning Centre provides.

Last Reviewed 27 April 2023

Next review due April 2023