



# Data Protection (GDPR) Policy

Part of the policy Framework

## Our Mission

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To promote high standards of Western Equitation  
and stimulate the growth of these riding disciplines

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## Document Metadata

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## 1. Purpose

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This policy outlines how the Western Equestrian Society (WES) manages personal data in compliance with the UK General Data Protection Regulation (UK GDPR). It ensures that WES:

- Respects the privacy of its members and contacts
- Processes data lawfully, fairly, and transparently
- Retains only what it needs
- Protects data from misuse or unauthorised access

## 2. Scope

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This policy applies to all personal data held by WES in electronic or paper form, including:

- Membership records
- Council, WES Pros, and volunteer data
- Event bookings and show entries
- Digital communications and marketing lists
- Complaint or disciplinary records

It applies to all Officers, Council members, volunteers, and third parties acting on behalf of WES.

## 3. Definitions

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- **Personal Data:** Information that identifies a living individual (e.g. name, email, address)
- **Special Category Data:** Sensitive data including health, race, or disability status
- **Data Subject:** The person whose data is being held or processed
- **Controller:** The organisation deciding why and how data is used (WES)
- **Processor:** A third party acting on behalf of WES (e.g. Member Mojo, SurveyMonkey)
- **Data Breach:** Any loss, unauthorised access, or improper disclosure of personal data

## 4. Policy Statement

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WES collects and uses personal data to support membership services, event management, governance, and Society communication. We only collect data we need, store it securely, and use it for clear purposes.

All processing is based on one or more lawful grounds under UK GDPR, typically:

- **Contractual:** Managing membership or event participation
- **Legitimate interest:** Running the Society effectively
- **Consent:** Optional newsletters or photo permissions
- **Legal obligation:** Retaining financial or safeguarding records

WES does **not** sell or share data for commercial purposes.

## 5. Roles and Responsibilities

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<b>Role</b>	<b>Responsibility</b>
Secretary	Acts as WES Data Lead; maintains policy, breach log, and ensures compliance
Treasurer	Ensures financial records meet HMRC and GDPR retention standards
All Officers	Handle data securely and report any breaches or concerns
Council	Oversees data protection governance; approves updates and handles escalation

## 6. Policy Detail / Procedures

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### 6.1 Data Collection and Use

- Only data needed to deliver services will be collected
- Consent will be used for optional communications or photography and must be active, informed, and revocable
- Sensitive data (e.g. medical conditions) will be collected only where necessary for safeguarding or access needs

### 6.2 Data Storage

- Membership and email data is stored via secure cloud systems (e.g. Member Mojo, Google Workspace, JotForm, Tally Forms)
- Access is restricted to relevant Officers and protected by passwords and 2FA where available

### 6.3 Data Sharing

- Data may be shared internally only where necessary for operations (e.g. Secretary providing event list to Show Co-ordinator)
- No personal data will be shared externally unless legally required or explicitly consented to
- Third-party platforms must provide GDPR-compliant terms and security standards

### 6.4 Data Retention

- Membership and contact data: Retained for 10 years (due to renewal opportunities)
- Event records: retained for indefinitely (due to points collation record keeping)
- Financial data: retained for 6 years as per HMRC rules
- Complaints and disciplinary records: retained for 6 years from case closure

### 6.5 Subject Access Requests (SARs)

- Requests must be made in writing to the Secretary
- WES will respond within 30 days, free of charge, unless the request is manifestly unfounded or excessive
- The response will confirm what data is held, its source, and how it is used

### 6.6 Breach Management

- Any data breach must be reported to the Secretary immediately
- A breach log will be maintained
- If the breach is serious (risk of harm or legal breach), WES will consider whether to notify the ICO and affected individuals within 72 hours

## 7. Related Policies and References

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- Subject Access Request (SAR) Procedure
- Confidential Records Protocol
- Data Breach Incident Log
- Risk Management Policy
- Disciplinary Procedure

## 8. Compliance and Breach Handling

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Failure to handle personal data responsibly or to report a breach may result in disciplinary action. WES reserves the right to restrict access or role privileges where compliance is not assured.

## 9. Review and Version Control

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Version	Date	Author	Changes Made
0.1	18/07/2025	DG	Initial policy draft
0.5	08/10/2025	DG	Changes following chairmans review
1.0	04/11/2025	DG	Published

## 10. Approval Record

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Approved By	Date	Notes
Full Council	04/11/2025	Approved for immediate use