



# KOOIKERHONDJE CLUB OF GREAT BRITAIN



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## GDPR Privacy Notice

### 1. Introduction

- 1.1. The Kooikerhondje Club of Great Britain is committed to protecting your personal information and respecting your privacy.
- 1.2. This Privacy Notice sets out the basis on which any personal data that we collect from or about you, or that you provide to us, will be processed by us.
- 1.3. For the purpose of the General Data Protection Regulation [the GDPR], the data controller is the Kooikerhondje Club of Great Britain whose registered office is that of the Hon Secretary (see above).
- 1.4. We may update this Privacy Notice from time to time. Any changes we make in the future will be posted on our website at <http://www.kooikerhondje.org.uk> / . Please check back regularly to see any updates or changes to this Policy.

### 2. Data Protection Contact

- 2.1. The contact details for our Secretary for any data protection queries are as per the letterhead above.

### 3. Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

#### **4. Particulars of processing**

- 4.1. We process personal data about members, judges, ring stewards and competitors/exhibitors to our events. The categories of person about whom we process personal data are described in more detail in the Particulars of Processing that are set out in the Annex to this Privacy Notice.

#### **5. Your rights as a data subject**

- 5.1. It is important that we tell you your rights that you have as a data subject under the General Data Protection Regulation – these are set out below.
- 5.2. The General Data Protection Regulation provides the following rights (subject to some exemptions):
- 5.2.1. The right to request access to the personal data that we hold about you;
  - 5.2.2. The right to request rectification of the personal data that we hold about you;
  - 5.2.3. The right to request erasure of the personal data that we hold about you;
  - 5.2.4. The right to request restriction of processing about you;
  - 5.2.5. The right to object to processing; and
  - 5.2.6. The right to data portability.

If at any point you believe the information we process on you is incorrect, incomplete or out of date then please let us know and we will make sure that your data is corrected.

If you wish to raise a complaint on how we have handled your personal data, you can contact our Secretary at the details below

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office (ICO) full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

#### **6. How we will use information about you**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest [or for official purposes].

7.1 We will generally process your personal data for contractual necessity in providing membership services and events. We may also use personal information for additional relevant and related purposes where you might reasonably expect us to do so, where the benefits of doing so are not outweighed by your own interests or fundamental rights or freedoms. The law calls this the “Legitimate Interests” condition for processing. This may include:

To maintain our records and other administrative purposes, including updating your details and preferences.

To assist with queries, complaints and dispute resolution;

Communications related to membership and invitations to participate in canine market research or canine health studies.

Upholding our club constitution and taking action in cases where there is a breach of the Club rules or Codes of Ethics.

7.2 We will ask for your direct consent IF we intend to use your personal data for marketing purposes. Where our processing of personal data is based on your having given consent, you have the right as a data subject to withdraw that consent at any time. If you wish to invoke this right, please notify the Secretary using the contact details set out in Section 2 above.

7.3 You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

## 8 Recipients of Data

8.1 We may use service providers to help us provide you with our services. Personal data may be transferred to such service provider, who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed.

8.2 Such third parties have contracted with us as data processors under the requirements in the GDPR. They are contractually bound to only use personal data for the agreed purpose(s). Relevant persons working for these third parties will have access to your personal data under the terms of the data processor contract, but only to the extent necessary to perform their services for us.

8.3 These data processors agree to implement reasonable contractual and technical protections, to keep your data confidential, not sell your personal data to third parties and to not disclose your personal data to third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy.

8.4 In appropriate circumstances we may disclose data to authorised bodies as required by law.

## **9 Contact details**

9.1 Please contact the Secretary above if you have any questions or concerns about personal data and privacy matters.

## ANNEX

This Annex sets out the Kennel Club's processing of personal data relating to breed clubs

### What personal data do we process?

- Name (members and judges)
- Address (members and judges)
- Email address (members and judges)
- Telephone number (members and judges)
- Affixes (members only)
- Last and next judging appointments (judges only)

### Where do we obtain your personal data from?

Most of the above personal data is received direct from you (the data subject). However, information may be received from third parties (e.g. the Kennel Club Breed Supplements for puppies, imported and sold dogs).

### Why do we process your personal data and what is the lawful basis?

We process your personal data for the following purposes:

- |   |                       |
|---|-----------------------|
| • Provision of membership services including administration and transactional communications relating to membership | Contractual Necessity |
| • Upholding the Club/society Rules and Code of Ethics   | Contractual Necessity |
| • Compliance with Kennel Club Rules and Regulations   | Contractual Necessity |
| • Contacting you by <b>email</b> to provide related information and information /marketing communications           | Consent               |

We also process personal data for the Club's legitimate interests as we have outlined in the main Privacy Notice (paragraph 4.3). Please be assured that we will always take account of your personal data rights in doing so.

### How long do we hold your personal data for?

Personal data will be retained in accordance with statutory requirements, Kennel Club requirements and recommendations and the club's retention policy which is available on request.

### Are you obliged to provide us with your personal data?

You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we will be unable to perform any contract we have with you for the provision of membership or event services.

## **Recipients of your personal data**

We disclose data to the following outsourced data processors, in line with section 5 of our main Privacy Policy, for the purposes of :

- Ensuring that our Dutch mother Club (the Vereniging Het Nederlandse Kooikerhondje, VHNK) is able to keep comprehensive world wide records of the breed. The VHNK is GDPR compliant.
- Ensuring that full health and veterinary test results for the Kooikerhondje breed for hereditary diseases specified at the time are recorded centrally through the VHNK-run ZooEasy system. ZooEasy is GDPR compliant.

If the Club decides to use show printer/entry handlers these organisations will send your data to us for our events and for results services.

## **Do we use your data for any automated decision-making?**

No personal data is processed for automated decision-making

**Any financial data arising from a transactional process will be held securely by the [organisation] in accordance and compliance with all statutory, HMRC and Financial Authority requirements.**

## **Kennel Club records**

The Kennel Club will hold the personal data of officers of the Club as a part of the implementation of Kennel Club Rules and Regulations.

We provide the Kennel Club with details of Kooikerhondje Club of Great Britain officers (and Challenge Certificate winners should the Kooikerhondje ever become at CC breed) at our events in order to meet requirements in the Kennel Club Rules and Regulations.

We provide show entrants' data to our show printer for inclusion in the show catalogue.