

# Privacy Policy

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Weatherbys Limited ("we", "us", "our") is committed to protecting and respecting your privacy at all times. We aim to be clear and transparent regarding how we process your personal data, but should you have any queries, we would be very happy to discuss them with you.

This policy (together with our terms and conditions and any other documents referred to in it) sets out the basis on which any personal data you provide to us, or we obtain, will be processed by us.

Please read through the following sections to understand:

**[What Personal Information we collect about you](#)**

**[Where we collect information from](#)**

**[Why we collect your personal data and the lawful basis we rely on to process it](#)**

**[How we use your information to make decisions](#)**

**[Who we share your personal information with](#)**

**[Your rights in relation to your personal data](#)**

**[How long we keep your personal data](#)**

**[Changes to our Privacy Policy](#)**

If you wish to read a particular section, please click on the relevant heading above to take you directly to that section.

Weatherbys Limited is the data controller. Our address is 52-60 Sanders Road, Wellingborough, Northamptonshire, NN8 4BX, United Kingdom. Our Data Protection Officer can be contacted by email at [dpo@weatherbys.co.uk](mailto:dpo@weatherbys.co.uk) or by telephoning our office on 01933 440077.

If you have any difficulty reading this Policy you can increase the font size through your browser.

## **What Personal Information we collect about you**

In order to provide you with our services and comply with the law and regulations by which we are bound, we will need to collect and process personal data about you. If you do not provide the information we require, whether it's necessary to enter into a contract with you and/or comply with our legal and regulatory obligations, it may delay or prevent us from meeting our obligations and may mean that unfortunately we will not be able to provide our services or products to you.

We use many different types of information which we have put into groups as set out below. Not all will apply to you or be required in our provision of services to you.

| Type of personal information | Description  |
|------------------------------|--|
| Financial                    | Your financial position, status and history  |
| Contact                      | Where you live and how we contact you, including email and telephone   |
| Socio-demographic            | This includes details about your employment, income, nationality   |
| Transactional                | Details about payments to and from your account(s) with us   |
| Contractual                  | Details about the products and services we provide to you  |
| Locational                   | Data we obtain about where you are for example, the address you connect a computer to the internet (IP address)  |
| Behavioural                  | Details about how you use our products and services  |
| Technical                    | Details of the devices and technology you use  |
| Communications               | What we learn about you from letters, emails and our conversations with you  |
| Social relationships         | Details regarding your family, friends and other relationships you provide to us   |
| Open data and public records | Details about you that are in public records, e.g. electoral register, and information about you that is available on the internet   |
| Usage data                   | Other data about how you use our products and services   |
| Special categories of data   | <p>The law states that some types of data are special category data. We will only collect this type of data with your consent. Such data includes but is not limited to your:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic or biometric data</li> <li>• Health data</li> <li>• Criminal convictions and offences</li> </ul> |
| Consents                     | Any permissions, consents or marketing preferences you give to us, including how you want us to contact you  |
| National identifier          | A number or code given to you by a government body to identify who you are such as a national insurance number or TIN number   |

## Cookies

We may use information about your general internet usage by using a cookie file which is stored on the hard drive of your computer or device. Cookies contain information that is transferred to your computer or devices' hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern;
- To store information about your preferences, and so allow us to customise our site according to your individual interests;
- To speed up your searches;
- For security; and
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

## Where we collect information from

We collect information from a variety of sources as set out below.

| Source of information                                  | How we collect the information  |
|--|---|
| Information you give to us                             | When you apply for or purchase our products and services<br><br>When you talk to us on the telephone (all calls are recorded and monitored for training and in order to improve our services to you) or face to face<br><br>When you use our websites or mobile device Apps<br><br>From emails and letters<br><br>If you take part in any of our client surveys, competitions or promotions |
| Information we collect from third parties we work with | This includes information provided by companies or individuals including: credit reference agencies; insurers; fraud prevention agencies; public sources of information such as Companies House; government and law enforcement agencies  |

## Why we collect your personal data and the lawful basis we rely on to process it

Data Protection law says that we are only allowed to process your personal information if we have one or more of the following lawful reasons:

- To fulfil a contract we have with you; or
- When it is needed to comply with our legal duty; or
- When it is in our legitimate interest; or
- When you give us your consent.

A legitimate interest means that we have a commercial or business reason to use your information, However, even then it must not unfairly go against what is right for you. If we rely on our legitimate interest, we will tell you what that is.

We have set out in the table below the ways in which we will use your information and which of the reasons we are relying on.

| What we use your personal information for   | The reason we are relying on  | Our legitimate interest   |
|---|---|---|
| To provide administration services to you for horseracing and horse breeding.<br><br>To provide product sales from our Bloodstock Services and Print Services divisions.<br><br>To provide information on badges for racecourse admission.<br><br>To sell you books and service subscriptions<br><br>To collect and recover any money that is owed to us. | Fulfilling a contract<br><br>Our legitimate interests<br><br>Legal duty     | Ensuring we are efficient in fulfilling our contractual and legal duties  |
| To contact you by telephone, email, text, online, via our mobile apps or by post to help you receive the services you have requested from us.   | Fulfilling a contract<br><br>Our legitimate interests<br><br>Our legal duty | Ensuring we are efficient in fulfilling our legal and contractual duties  |
| To allow us to pursue our legitimate business interests which may include performing credit checks. We will also use your information to assess and improve our services and for training and quality   | Our legitimate interests  | Ensuring that we run our business efficiently, achieve our business objectives and operate in our client's best interests |

|  |         |  |
|--|---------|--|
| purposes. For example we record all telephone calls.   |         |  |
| To provide details of products and services we have carefully selected for you but only where you have provided your advance consent. We will never pass your information to a third party for them to use in their own direct marketing | Consent | Ensuring that we inform our clients of all suitable products and services which may be of interest to them |

### **Who we share your personal information with**

In order to provide you with our services and to comply with the law and other regulations, we may share your personal data with other third parties. However those third parties are also bound to keep your personal data secure and confidential. We may transfer and disclose your information to:

- Any authorities we are required to share information with by law or for regulatory purposes for example, HMRC and Information Commissioners Office.
- Persons acting on your behalf.
- Our service providers (including their sub-contractors) such as mailing houses.
- Financial institutions such as fraud prevention agencies, credit reference agencies and debt recovery agents
- Companies or individuals that you ask us to share your information with

If we share any information with organisations in a country outside the UK, we will ensure that they have or agree to apply equivalent levels of protection unless this is not possible but we are required by law to share the information in any event.

### **How we use your information to make profiling decisions**

- We do not do this.

### **Sending your information outside the EEA**

We will only send your information outside the EEA if we are following your instructions, complying with a legal duty or working with Fraud Prevention Agencies.

### **Marketing**

We may use your information to tell you about relevant products and services which we consider would be interesting or suitable for you. We can and will only send you marketing if you have positively given us your consent in advance.

## **Your rights in relation to your information**

Under the Law you have various rights in relation to your information. These rights are explained below:

### **1 How to get a copy of your information**

You are entitled to request access to your personal data at any time by contacting us. We will provide you with access to your information without delay and within 1 month of receiving your request, or at the latest within 3 months.

Access will be provided free of charge unless your requests are excessive or unfounded in which case we are entitled to charge a reasonable administrative fee or we may refuse to respond. We will provide you with an explanation in either case.

Before complying with your request, we are obliged to verify your identity.

If a large amount of information is involved we may ask you to specify the information you wish to access.

### **2 What to do if you think your information is incorrect**

You can ask us to correct your information if you think it is incorrect. Please contact us if you want to do this.

We will correct information without undue delay and at the latest within one month of receiving the request from you.

If we have disclosed it to a third party, we will endeavour to contact them and inform them of the changes unless this is not possible or it would be disproportionate to do so.

### **3 What to do if you want us to stop using your information**

You have the right to object to us using your information, ask us to restrict our use of it or ask us to delete it if there is no need for us to keep it. This is known as the "right to object", the "right to restrict" and the "right to be forgotten". There may however be legal or other reasons why we need to keep your information, however we will inform you of this when you make your request.

You can ask us to stop processing your information where we are doing so for our legitimate interests or where you wish to withdraw your consent.

## **Marketing**

If you no longer wish us to contact you for marketing purposes, you have the right to ask us to stop by withdrawing your consent. This can be done by:

- telephoning us on 01933 440077;
- sending an email and/or using the unsubscribe link at the bottom of emails we send to you;
- by writing to the Data Protection Officer, Weatherbys Limited, Sanders Road, Wellingborough, NN8 4BX.

You can choose any of the above methods, regardless of the method you chose to give us consent to marketing in the first place. When we receive your withdrawal of consent, we will update our records accordingly and ensure that you no longer receive marketing from us. You can of course change your mind and ask us to send you marketing in the future. We would however need to obtain new consent from you.

Please note that we are entitled to have processed your information up until the time that you withdraw your consent.

You can ask us to restrict the use we make of your information if:

- It's not accurate
- It's been used unlawfully but you don't want us to delete it
- It is not relevant any more, but you want us to keep it for use in legal claims
- You have already asked us to stop using it but you are waiting for us to tell you if we are allowed to keep on using it

Where we have restricted processing, we will tell you when that restriction has been lifted.

You can ask us to delete your information where:

- We no longer need it;
- You have withdrawn your consent or objected to us processing it and we have no other reason to keep it.

However this does not apply where we need it to fulfil our contract with you or comply with the Law or to deal with a legal claim.

#### **4 What to do if you want a reusable copy of your personal data**

You have the right to receive a copy of the personal data we process in a format that can be reused or ask us to transfer your information to another organisation where possible. This only applies to personal data that is we hold electronically.

#### **How long we keep your personal data**

We will keep your personal data in accordance with our Data Retention Policy. In most cases, we will keep it for 7 years after you have ceased your relationship with us, in order to respond to any questions or complaints; show that we have treated you fairly or to maintain records according to rules that apply to us.

We may keep your information for longer than 7 years after you have ceased your relationship with us, if it is needed for legal or regulatory reasons. We may also keep it for statistical purposes. If we do, we will make sure that your privacy is protected and only use your information for those purposes.

#### **Changes to our Privacy Policy**

We will keep our Privacy Policy under regular review and will place any amendments on our website [www.weatherbys.co.uk](http://www.weatherbys.co.uk). This Privacy Policy was last updated in May 2018.

#### **What to do if you are unhappy about the way in which we use your information**

If you are unhappy with any aspect of how we treat your personal information, please contact our Data Protection Officer. You also have the right to make a complaint to the Information Commissioners Office (ICO) by contacting them at:

- [www.ico.org.uk](http://www.ico.org.uk)
- By telephone: 0303 123 1113 or from outside the UK +44 1625 545 700
- By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF