

PRIVACY POLICY - BURGHLEY HORSE TRIALS 2023

Effective Date: 25 July 2023

This Privacy Policy explains how we collect, use, disclose, and protect your personal data when you interact with our website and services that have been produced on behalf of Burghley Horse Trials. We are committed to ensuring the privacy and security of your personal data in compliance with the General Data Protection Regulation (GDPR) and other applicable data protection laws.

INTRODUCTION

RFIdentikit ("we," "us," or "our") operates as a data processor, providing data processing services to our clients ("Data Controllers"). This Privacy Policy applies to the personal data we collect and process on behalf of Burghley Horse Trials. For detailed information about your personal data collected directly by our clients as Data Controllers, please refer to their respective privacy policies.

PERSONAL DATA WE COLLECT

We collect and process personal data on behalf of Burghley Horse Trials in order to provide our services. This data will either be collected through our web portal, in person at the accreditation window or will be sent to us by Burghley Horse Trials prior to the event. The types of personal data we collect may include:

- Key Personal Data
 - This is information like name, date of birth, preferred language and nationality.
- Contact Information
 - This would be email addresses, phone numbers or home addresses.

Lawful Basis

We collect personal data based on the lawful basis as defined by Burghley Horse Trials, who acts as the Data Controller. The lawful basis for processing may include:

- Consent: When we have obtained valid consent from you for processing your data – for example when you use our web portals and are required to agree to terms and conditions.
- Contractual Necessity: When processing is necessary for the performance of our contract with Burghley Horse Trials or to take steps at their request prior to entering into a contract.
- Legal Obligation: When processing is necessary to comply with a legal obligation imposed on Burghley Horse Trials of which we have been approached to assist with this obligation.
- Legitimate Interests: When processing is based on Burghley Horse Trials's legitimate interests or those of a third party, provided that such interests are not overridden by the individuals' rights and interests. In this instance the interest would be the safety and security of Burghley Horse Trials 2023 event site.

UK

3 Albert House, Knap Close, Letchworth, Herts, SG6 1AQ, UK
uk@rfidentikit.com

AU

40 Kent Road, Mascot, NSW, 2020, Australia
au@rfidentikit.com

RFIDENTIKIT.COM



USE OF PERSONAL DATA

We process personal data on behalf of Burghley Horse Trials for the following purposes:

- To manage applications that come into the system with requests to access the event site
- To create passes that are used as security devices and represent a persons access
- To control the access to certain areas of the site based on a persons role

There is no other way to achieve the same level of security without processing personal data as generic access media is inherently insecure and introduces risks that we are actively trying to remove.

We retain personal data in accordance with the instructions provided by Burghley Horse Trials, the Data Controllers. We will not retain personal data longer than necessary for the purposes for which it was collected, unless required by law.

The data is collected and processed under contractual obligation.

DATA SHARING AND DISCLOSURE

We do not sell or rent personal data to third parties for marketing purposes. However, we may share personal data with the following entities:

- Legal Compliance: We may disclose personal data to comply with legal obligations, respond to lawful requests, enforce our rights, protect our property and safety, or those of others.
- Business Transfers: In the event of a merger, acquisition, or sale of all or a portion of our assets, personal data may be transferred to the acquiring entity or third party involved.

INTERNATIONAL DATA TRANSFERS

We may transfer personal data to countries outside the European Economic Area (EEA) if required for the purposes specified in this Privacy Policy. We will ensure that such transfers are made in accordance with the GDPR's requirements, including the use of appropriate safeguards.

Our company is based in the UK and therefore all data will be accessed by key members of staff in the UK. Safeguarding will remain in accordance with GDPR.

DATA SECURITY

We implement technical and organisational measures to protect personal data against unauthorized access, loss, alteration, or destruction. We regularly review and enhance our security measures to maintain a high level of data protection.

YOUR RIGHTS

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RFIDentikit Limited, registered in England and Wales. Number 10001091 - Registered Address, RFIDentikit, Albert House, Knap Close, Letchworth, Herts, SG6 1AQ, UK
RFIDentikit Australia Pty Limited, registered in Australia, ACN 629 673 598 - Registered Address, RFIDentikit Limited, 40 Kent Road, Mascot, NSW, 2020, Australia



As the personal data we process is on behalf of Burghley Horse Trials, your rights under the GDPR should be exercised directly with Burghley Horse Trials. We will assist Burghley Horse Trials, as instructed, in fulfilling their obligations to respond to your requests concerning your personal data.

Under the General Data Protection Regulation (GDPR), individuals have the right to lodge a complaint with a supervisory authority if they believe that their personal data is being processed in violation of their privacy rights. The supervisory authority is an independent public authority responsible for overseeing and enforcing data protection laws within their respective jurisdictions. If you, as a data subject, wish to exercise this right, you have the option to contact the supervisory authority in your country of residence or the location where the alleged infringement occurred. The supervisory authority will investigate the matter and take appropriate actions, which may include conducting audits, issuing warnings, and imposing fines on the data controller or processor if they are found to be in breach of GDPR regulations. We are committed to cooperating with the supervisory authorities and assisting you in addressing any concerns you may have regarding the processing of your personal data.

UPDATES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. The most recent version will be indicated by the "Effective Date" at the top of the policy. Any changes will be effective immediately upon posting the updated Privacy Policy.

CONTACT US

If you have any questions, concerns, or requests regarding this Privacy Policy or the processing of your personal data, please contact the respective Data Controller or our Data Protection Officer at info@rfidentikit.com.

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