



Privacy Statement

The Irish Equine Foundation CLG (IEC), and Irish Diagnostic Laboratory Services Ltd (IDLS), Johnstown, Naas, Co. Kildare share your concern about the protection of your information and are committed to safeguarding your privacy.

This document covers information we collect about you.

Please read it carefully to understand how your information will be treated.

At the IEC and IDLS we are committed to processing information about our customers in ways that comply with our legal obligations as well as being clear with our customers about what we do with their information. Some of the key points of IEC's privacy statement are:

- ✓ We don't sell your data to third parties
- ✓ We do make it easy for you to manage your information, you can change your communication preferences at any time
- ✓ We do use data to help us provide great customer service, which includes tailoring the information we share with you to help ensure that it's relevant, useful and timely

We will be the "controller" of the information which you provide to us or which we collect from you.

1. Information that we collect

We collect a range of business and information relating to you, including your:

- Trading name;
- Email address;
- Telephone number;
- Credit or debit card information and/or other payment information;
- IP address; and;
- Any other information that you choose to provide to us when you joined us as a Customer or which you regularly update us on.

2. How we use your information

We use your information as follows:

- To maintain our relationship with you whilst you are a customer;
- To process orders and provide agreed goods and services to you;
- For invoicing, processing payments, account set up and maintenance;

- To communicate with you, including to respond to information requests /enquiries submitted and/or to obtain your feedback on our products and services;
- For record keeping, statistical analysis and internal reporting and research purposes;
- To ensure data security and to provide you with access to secure areas of our Website;
- To notify you about changes to our products and services;
- To decide on and notify you about price changes;
- To monitor the quality of our products and services;
- For logistical purposes, including to plan and log delivery/collection routes;
- To investigate any complaint you make;
- To provide evidence in any dispute or anticipated dispute between you and us;
- To obtain credit references, credit checks and for debt collection, fraud detection and prevention and risk management purposes;
- To protect the rights, property, and/or safety of the IEC and IDLS, its personnel and others.

3. Automated decision making/profiling

Credit Checks

We use technology provided by the credit reference agencies like the Irish Credit Bureau that processes information that you provide to us, in order to analyse your creditworthiness, which helps us to decide if we are able to offer you an account, through which you can purchase products and services. We will also continue to exchange information about you with the ICB on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. The ICB will share this information with other organisations, which may use it to make decisions on future applications for credit.

The ICB provides a Credit Reference Agency Information Notice (“CRAIN”) with further information about how it uses and shares information that it receives about you and/or your business, which is available to review at this link: www.icb.ie

If you pass our credit checks, and our other account opening criteria (details of which can be made available to you during the account opening process) you will be entitled to open an account with us and order any of our products and services. If you do not pass our credit checks you will not be able to set up an account but you may still be entitled to order our products or services (in accordance with our General Conditions of Sale) at our discretion, by making payment upfront.

4. Legal basis for processing

In terms of the legal bases we rely on to process your information, these are as follows:

- For the performance of a contract with you (such as a contract for the provision of good and services) or to take steps at your request prior to entering into this contract;
- To comply with legal obligations, including in relation to health and safety and environmental legislation, performing anti- money laundering, terrorism prevention and sanctions screening checks, complaints and investigations or litigation;
- For our legitimate interests in:
 - management of your account (including processing payments) and our relationship with you, and communicating with you
 - our internal business purposes which may include processing for the purposes of: record keeping, research, reporting and statistics, data security, to ensure the quality of our products and services, investigating and responding to queries and complaints, obtaining credit references and credit checks, providing payment performance data to credit reference agencies, changing our pricing, debt collection, fraud detection and prevention, risk management, recruitment and training of our personnel, and protecting our rights, property and safety (and that of others).

5. How we share your information

When we use your information for the purposes specified above, we may share your information with:

- Third party providers in order for us to process payments that are due to us, in doing so we provide bank card details to such providers;
- Licensed credit reference agencies, debt collection agencies and lawyers when we carry out credit checks, to report on your payment performance and/or or seek to recover debts due to us;
- Our accountants, auditors, lawyers or similar advisers when we ask them to provide us with professional advice;
- Emergency services in the event that we need to report accidents or incidents or request emergency assistance;
- Any Government Department, public body or other third party where we believe in good faith that the law requires this; in the interests of public health and safety; or in order to protect the rights, property, or safety of the IEC/IDLS, its employees or others;
- Any other third parties, if authorised by you to do so.

6. How long we keep your information

We retain your information for no longer than is necessary for the purposes for which it is collected. When determining the relevant retention periods, we will take into account factors including:

- Legal obligation(s) under applicable law to retain data for a certain period of time;
- Statute of limitations under applicable law(s);
- (potential) disputes, and;
- Guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

7. Security

We use reasonable security methods to protect the information that we process, including Internet standard encryption technology (“SSL“ or “Secure Socket Layer“ technology) to encode information that you send to us through our Website. SSL works by using a private key to encrypt data that’s transferred over the SSL connection. To check that you are in a secure area of the Website before sending any information to us, please look at the bottom right of your website browser and check that it displays an image of a closed padlock or an unbroken key.

However, please note that whilst we take appropriate technical and organisational measures to safeguard the information that you provide to us, no transmission over the Internet can be guaranteed to be secure. Consequently, please note that we cannot guarantee the security of any information that you transfer to us over the Internet.

8. Your rights

The following section explains your rights. The various rights are not absolute and each is subject to certain exceptions or qualifications.

We will grant your request only to the extent that it follows from our assessment of your request that we are allowed and required to do so under data protection laws. Nothing in this Privacy Statement is intended to provide you with rights beyond or in addition to your rights as a data subject under data protection laws.

a. The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Privacy Statement.

b. The right of access

You have the right to obtain a copy of your information (if we're processing it), and other certain information (similar to that provided in this Privacy Statement) about how it is used.

This is so you're aware and can check that we're using your information in accordance with data protection law.

We can refuse to provide information where to do so may reveal information about another person or would otherwise negatively impact another person's rights.

c. The right to rectification

You can ask us to take reasonable measures to correct your information if it's inaccurate or incomplete. E.g. if we have incorrect details about your business.

d. The right to erasure

This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it or its use is unlawful. This is not a general right to erasure; there are exceptions, e.g. where we need to use the information in defence of a legal claim.

e. The right to restrict processing

You have rights to 'block' or suppress further use of your information when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

f. The right to data portability

You have rights to obtain and reuse certain information for your own purposes across different organisations. This enables you to move, copy or transfer your information easily between our IT systems and theirs (or directly to yourself) safely and securely, without affecting its usability. This only applies to your information that you have provided to us that we are processing with your consent or to perform a contract which you are a party to (such as pay and compensation services), which is being processed by automated means.

g. The right to object

You have the right to object to certain types of processing, on grounds relating to your particular situation, at any time insofar as that processing takes place for the purposes of legitimate interests pursued by the IE/ IDLS or by a third party. We will be allowed to continue to process the information if we can demonstrate "compelling legitimate grounds for the processing which override [your] interests, rights and freedoms" or we need this for the establishment, exercise or defence of legal claims.

You have the right not to be subject to a decision based solely on automated processing (including profiling), which significantly affects you, subject to some exceptions. Where this is the case, you have the right to obtain human intervention, voice your concerns and to have the decision reviewed.

9. Updating this statement

We review our privacy practices from time to time. We reserve the right to modify this policy effective seven (7) days after the posting of the revised Privacy Statement.

10. Contact us

For further information regarding these rights, about this Privacy Statement generally or to make a complaint please contact our Company Secretary at pkelly@irishequinecentre.ie or call us on 045 866 266.

Please provide as much information as possible to help us identify the information you are requesting, the action you are wanting us to take and why you believe this action should be taken.

Before assessing your request, we may request additional information in order to identify you. If you do not provide the requested information and, as a result we are not in a position to identify you, we may refuse to action your request.

We will generally respond to your request within one month of receipt of your request. We can extend this period by an additional two months if this is necessary taking into account the complexity and number of requests that you have submitted.

We will not charge you for such communications or actions we take, unless:

- **You request additional copies of your data undergoing processing, in which case we may charge for our reasonable administrative costs, or**
- **You submit manifestly unfounded or excessive requests, in particular because of their repetitive character, in which case we may either: (a) charge for our reasonable administrative costs; or (b) refuse to act on the request.**

If after contacting the IEC/ IDLS you are still unhappy you may also complain to the Information Commissioner, all contact details are available on the Information Commissioner's Website: dataprotection.ie