

# Pathway Ponies GDPR (Data Protection) Policy

## Policy Statement

Pathway Ponies is committed to protecting the privacy and security of personal data. This GDPR Policy outlines our approach to handling personal data in compliance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. We are dedicated to safeguarding the information we collect from our clients, employees, volunteers, and all other stakeholders.

## 1. Purpose of the Policy

This policy ensures that Pathway Ponies:

- Complies with data protection law and follows best practices.
- Protects the rights of clients, staff, and partners.
- Is transparent about how we collect, process, and store data.
- Maintains accountability for data protection and privacy standards.

## 2. Scope

This policy applies to all staff, volunteers, contractors, and any third parties who process personal data on behalf of Pathway Ponies.

## 3. Key Definitions

- **Personal Data:** Any information that can directly or indirectly identify an individual (e.g., name, address, phone number, email).
- **Processing:** Any activity involving personal data, including collection, storage, retrieval, use, disclosure, or deletion.
- **Data Subject:** Any individual whose personal data is collected by Pathway Ponies.

## 4. Data Collection

Pathway Ponies may collect personal data for the following purposes:

- Enrolling participants in our programs.
- Communicating with clients, staff, and volunteers.
- Managing bookings, schedules, and payments.
- Complying with health, safety, and safeguarding regulations.

The types of personal data we may collect include:

- **Basic Information:** Names, contact details, emergency contacts, and birth dates.
- **Sensitive Information:** Health and medical details, only collected with explicit consent and where necessary for participation.
- **Payment Information:** Payment records, processed securely for administrative purposes.

## 5. Legal Bases for Data Processing

Pathway Ponies will process personal data lawfully, transparently, and only for legitimate purposes. The legal bases for our data processing activities include:

- **Consent:** We obtain consent from individuals where required, such as for sharing photographs.
- **Contractual Necessity:** Personal data is processed to fulfil our service agreements with clients.

- **Legal Obligation:** We process data to comply with relevant laws and regulations.
- **Legitimate Interests:** We may process personal data to improve our services, ensuring the data subject's rights are not overridden.

## 6. How We Use Personal Data

Personal data will only be used for the purposes specified at the time of collection or for purposes consistent with the original intent. Typical uses of data include:

- Organising and coordinating services, activities, and events.
- Communicating with participants, families, and support workers.
- Meeting legal and safeguarding obligations.
- Conducting health and safety checks as required.

## 7. Data Sharing

Pathway Ponies will not share personal data with third parties unless:

- We have received explicit consent from the data subject.
- It is necessary for legal or regulatory purposes (e.g., safeguarding concerns).
- It is required for administrative or operational reasons
- It is in the best interest of the data subject's health and safety, especially in emergency situations.

Where data sharing is necessary, we will ensure that third parties have appropriate data protection practices in place.

## 8. Data Security and Storage

- **Physical Security:** Hard copies of personal data are stored securely in locked files accessible only to authorised personnel.
- **Digital Security:** Electronic data is stored on secure, password-protected systems. **Data Retention:** Personal data will be retained only as long as necessary to fulfil the purposes for which it was collected, in line with legal requirements. After this period, data will be securely deleted.

## 9. Data Subject Rights

Under GDPR, data subjects have the following rights:

- **Right to Access:** Individuals can request access to their personal data held by Pathway Ponies.
- **Right to Rectification:** Individuals can request corrections to inaccurate or incomplete data.
- **Right to Erasure (Right to be Forgotten):** Individuals can request the deletion of their data where it is no longer necessary for the purpose it was collected.
- **Right to Restriction of Processing:** Individuals can request a limit on how their data is processed.
- **Right to Data Portability:** Individuals can request their data in a commonly used electronic format.
- **Right to Object:** Individuals can object to data processing based on legitimate interests or direct marketing.
- **Right to Withdraw Consent:** Individuals have the right to withdraw consent at any time where processing is based on consent.

To exercise these rights, data subjects may contact Pathway Ponies at [pathwayponies@gmail.co.uk](mailto:pathwayponies@gmail.co.uk) or 07984 417772.

## 10. Data Breach Procedures

Pathway Ponies takes data breaches seriously and has a procedure in place to manage them. If a data breach is suspected or detected:

1. We will investigate the breach immediately.
2. If necessary, we will notify affected individuals and the Information Commissioner's Office (ICO) within 72 hours if there is a risk to individuals' rights and freedoms.
3. We will take corrective actions to prevent further breaches and improve our security protocols as needed.

## 11. Policy Review

This GDPR Policy will be reviewed annually or in response to changes in relevant legislation or data protection practices.

**Last Review Date:** 8th November 2024

**Next Review Date:** 8th November 2025

## 12. Contact Information

For questions or concerns regarding this policy or the processing of personal data, please contact:

**Pathway Ponies Data Protection Officer:** Carly Flower, 07984 417772,  
pathwayponies@gmail.com

### Approval and Implementation

This policy is approved by Carly Flower, Owner and is effective as of 8th November 2022.