



POLICY:

Privacy Policy

FAO: Staff / Volunteers / Participants / Visitors

Sirona Therapeutic Horsemanship CIO is committed to protecting your personal information. Therefore, when you contact us (for whatever reason) you can be confident about how your personal information will be looked after and used.

This Privacy Policy sets out how we collect, use and protect your personal data, in accordance with the (UK) General Data Protection Regulation (GDPR), the Data Protection Act 2018, Data (Use & Access) Act, Privacy & Electronic Communications Regulations 2003) and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation'). If you have any questions, please contact Diane Cleave Diane@sironaequine.org.uk or write to: Sirona Therapeutic Horsemanship CIO, Buckhams Stables, Old School Farm, Dartington Estate, Totnes, TQ9 6EB

Sirona promises to respect any personal data you share with us and to keep it safe. We aim to comply with regulations, to be clear when we collect your data, to collect your consent and not to do anything you wouldn't reasonably expect. Please read this Privacy Policy carefully to understand our practices regarding your personal data and how we will treat it.

This Privacy Policy explains:

1. About Sirona
2. What information we collect and why
3. How we collect, use and keep your information safe
4. Who we share your information with
5. Your rights
6. Changes to this Privacy Policy
7. How to contact us

1. About Sirona Therapeutic Horsemanship

Sirona Therapeutic Horsemanship CIO (*hereafter referred to as Sirona) provides equine-assisted therapeutic and educational activities to young people with psycho-social support needs and other disadvantages and disabilities. At Sirona young people participate in equine-based activities



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within a positive learning approach set in the rural environment. Through developing relationships with the horses and learning challenging new skills, participants gain increased self-confidence and self-awareness, improved communication skills and learn responsibility and empathy. These are factors linked to resilience which is claimed to be essential in achieving positive life outcomes. Sirona Therapeutic Horsemanship CIO is a registered charity (no: 1169709). Our Data Protection Officer is Diane Cleave, who is responsible for assisting with enquiries in relation to the privacy notice or our treatment of your personal data. Should you wish to contact her you can do so using the contact details noted in Section 7.

2. What information we collect and why

The personal information we collect, and how we use it, will depend on your engagement with us but it may include your name and contact details (eg telephone, email and address). We require your personal information in the following circumstances:

- If we are providing you with a service or information
- If we are contacting you about our fundraising activities, campaigns or appeals
- If we are sending you our newsletter or event notifications
- In the context of offering employment or volunteering opportunities; or
- If we are entering into a contract with you

If you are making a donation or signing up to be a regular donor, we may also require your bank/credit/debit card details.

If we are providing you with a direct service pursuant to our charitable objects, we will require further detailed information from you.

We gather general information about the use of our website, for example which pages are the most visited. The data that we see about website usage is anonymous.

Special Categories Data

Owing to the services that we offer, Sirona needs to collect, store and process sensitive personal information (known as special category data) about you. Special category data is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs,



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trade union membership, genetic data, biometric data, and/or information concerning health. We collect and process information concerning your health (health data) for the purpose of assessing the suitability of our services. Where we collect such information, we will only request and process the minimum necessary for specified purposes. The legal basis for this processing is the compliance with our legal obligations, to protect your vital interests and consent.

3. How we collect, use and keep your information safe

3.1 How we collect the information

We collect information in the following ways:

- Directly from you when you:
 - Enquire about our activities
 - Register to attend a Sirona event
 - Register with us or subscribe to our newsletter and event notifications
 - Visit our website
 - Donate to, or fundraise for, Sirona
 - Receive a service from Sirona
 - Engage with us via social media
 - Submit an application for a job or volunteering opportunity
- Indirectly:
 - Via fundraising sites (for example Crowdfunder LTD) if you have indicated that you wish to support Sirona and you have given your consent for information to be shared
 - When you have given permission to other organisations to share your information
 - Via one of our referrers (such as CAMHS or Social Services)
 - When we deliver services as part of a contract



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3.2 How we use that information

We may use your information to:

- Provide you with the service, advice or information you have asked for
- Keep a record of your relationship with us; keep your information up-to-date and accurate and to ensure we comply with your communication preferences (in accordance with fundraising regulations, UK GDPR and the Data Protection Act 2018)
- Administer your donation, support your fundraising, process Gift Aid
- Send you our newsletter and/or e-Newsletter if you have given your consent
- Send you fundraising updates and appeals we think might be of interest to you if you have given your consent
- Process applications for employment or volunteering opportunities
- Understand how we can improve our services, products and information
- Undertake analysis and statistical reporting. Where we undertake this activity the data is usually anonymised unless and except where we have advised and confirmed this with you in advance
- Segment our databases (for example by geographical or demographical information) to help us to target our resources more effectively and to provide an improved experience to people who choose to support us
- Fulfil a contract

Our supporters have a choice about what information they receive from Sirona. You can Sign up to our mailing list. If you wish to amend what you receive from us you can follow the link at the bottom of our newsletters.

3.3 How we keep your information safe

We ensure that there are appropriate technical, physical and organisational measures in place to protect your personal information both online and off-line.



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Information that we hold on you will be stored securely and only be kept as long as is reasonable and necessary, for as long as you continue to engage with us and in line with any statutory obligations placed on Sirona (for example Gift Aid information).

In cases where we may need to transfer or process your personal information outside the UK we will comply fully with our legal obligations.

When you are using our secure online donation pages, your donation is processed by a third party payment processor.

We use Mailchimp to manage our mailing list. The relevant information, such as your name and your email address, will be stored with Mailchimp and assessable to us. You are in control of this and can sign up or unsubscribe at any time.

Our website may contain links to other websites. Please note that these other websites are not covered by this Privacy Policy.

4. Who we share your information with

- Sirona may be required to share information in specific cases where we are providing a direct service/contract; or where we are required by law, for example employment law
- Where we engage a third party to deliver a service on our behalf, only required data will be shared. This will be in line with data protection legislation
- Where you have chosen to share your story to help further our work and you have given your explicit consent we may share sensitive information in materials promoting our campaigning, services or fundraising work or in specific documents. Where we undertake this activity the data is usually anonymised unless and except where we have advised and confirmed this with you in advance
- Sirona will comply and co-operate with regulatory authorities when we are legally required to do so – in such cases personal information would be passed on in accordance with the data protection legislation
- Where there is a perceived threat to life due to suicidal intent or serious concern regarding a child, Sirona may be required, in line with its duty of



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care, to report these concerns to the police or social services. In circumstances other than those noted above, Sirona will not share your information with any other organisation for marketing, market research, fundraising or commercial purposes.

Data Security

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

5. Your rights

You have a right to:

- Request to see the personal information we hold about you. In such cases we may require proof of identity before we provide you with this information
- Request that inaccurate information about you be corrected
- Change your 'opt-in'/ communication preferences
- Unsubscribe from email communications - if you no longer wish to receive email communications from us. You can do this by clicking on the 'unsubscribe' link at the bottom of our email communication
- Withdraw consent and request that your details be removed from our database, or otherwise erased or destroyed.

If you feel that any data we hold, handle or use is causing damage or distress or if you have any other complaints please contact us using the details in Section 7 and we will endeavour to rectify the situation.

If you are unhappy with how we have handled your information you can contact the ICO.



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Your Duty to Inform us of Changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes which we need to be made aware of by contacting us, using the details in Section 7.

6. Changes to this Privacy Policy

This Privacy Policy was approved at a Board meeting of the Trustees on 25th May 2018. It will be reviewed annually thereafter or more frequently if appropriate. Any changes will be incorporated into an updated version of this document and if the changes are significant we will provide a more prominent notice.

7. How to contact us

If you have any questions about this Privacy Policy or any other data protection queries; would like to make a request to receive a copy of your personal information held by Sirona, please contact: Diane@sironaequine.org.uk Or you can write to us at:

Diane Cleave,
Sirona Therapeutic Horsemanship CIO
Buckhams Stables,
Old School Farm,
Dartington Estate,
Totnes, TQ9 6EB