

## **HPower Group Privacy Policy in relation to Horse World Remembers**

### **1. Introduction**

This privacy policy (**Privacy Policy**) sets out the ways in which all members of the **HPower Group** (by which we mean Horsepower International Ltd, registered in the United Kingdom (Company Number 02383294), Windsor Equestrian Promotions Ltd, registered in the United Kingdom (Company Number 03161418), and HPG Endurance Ltd, registered in the United Kingdom (Company Number 10056565) may use your personal data.

In this Privacy Policy:

- **'we', 'us' or 'our'** means the HPower Group entity with which you are interacting as detailed above. For example, the HPower Group entity organising the event you are attending, or managing the website you are using. We will make it clear to you which entity this is;
- **'the website'** means the Horse World Remembers website you are visiting or engaging with; and
- **'you' and 'your'** means you, the person engaging with us by interacting with our website.

By visiting our website or otherwise interacting with us, we will process your personal data in accordance with this Privacy Policy.

### **2. How you can contact us:**

**Address:**       **FAO the Data Protection Officer**, HPower Group Ltd, Stable House, St Albans Close, Windsor, Berkshire SL4 1UT, United Kingdom.

**Email:**         [info@hpower.co.uk](mailto:info@hpower.co.uk)

### **3. Information we may collect about you**

- **Information you give us:** We collect any information you provide to us when you leave a message for the book of condolence. This information might include your name, email address, and your personal message for the service that you're registering for.
- **Information we collect about you:** We will collect any information contained in any correspondence between you and us via contact forms on the websites, and emails or telephone calls.
  - We collect information about you visiting our website and how you use it. This may include your IP address, geographical location, device information, browser type, referral source, length of visit, operating system, number of page views, which pages you viewed and similar information. This information may be collected by a third party website analytics service provider on our behalf and/or may be collected using cookies. We also use cookies and pixels in our emails to track delivery and open rates, the results of which are stored against your email address and profile. For more information on cookies please refer to paragraph 6 below

### 3. How we use information about you

We may use your information for the following purposes, depending on the relationship we have with you. Prior to submitting your personal data to us, we will provide you more specific information where necessary about how we will use your data, and link you to this privacy policy.

| <b>We use personal data to:</b>  | <b>The purpose of this is:</b>   | <b>The applicable legal basis:</b>  |
|--|--|---|
| Provide you with information that you have requested from us, in relation to events we run, or other services we provide (for example e-newsletters).          | We will need to use your contact details to keep you updated about the products or services you have indicated you are interested in.              | By specifically entering information into the book of condolence, you are consenting to us using your personal data for the purposes of communicating with you should we need to. |
| For general administration and organisation of our events, for example to contact you with information about an event that you're exhibiting at, or attending. | We will need to use your details for planning and logistics, to provide you customer service in relation to the event, and general administration. | Where you have made an entry into the book of condolence, we need to use your personal data in this way to perform our contractual obligations to you.                            |

|  |  |  |
|--|--|--|
| Analyse user traffic to measure use of our websites and improve their content. | We may use information such as your IP address for analytical purposes of our pages, this could also include improving the content of our websites and services. | We have identified web analytics as a legitimate interest of our business, and allow us to better meet your needs as a customer. |
| To comply with or abide by legal obligations or requirements.                  | We may need to use or process your personal data to comply with some legal requirements.   | Where we need to process your data for these reasons, the legal basis will be compliance with a legal obligation.                |

You can find out more information on the privacy **notice** provided at the time you submit your data to us or in your contract with us (if applicable).

#### 4. Who we might share your data with

In certain circumstances we may share your personal information with:

- a. Other entities in the HPower Group.
- b. Selected third parties that we work with, where necessary for the purposes of delivering to you services that you request from us. Where we use such third parties, we enter contracts which ensure that the third party is obligated to provide at least the same level of data protection as the HPower Group entity entering into that contract, and we take reasonable, appropriate steps to ensure that the contractor effectively processes the personal data in a manner consistent with this Privacy Policy and our internal policies relating to the protection of Personal Data.
- c. Any other third parties where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

#### 5. Cookies

We use cookies to ensure that you get the most out of our website. Cookies are small text files which we store on the device you use to access the website. Cookies allow us to monitor your use of the software and simplify your use of the website. For example, a temporary cookie is also used to keep track of your "session". Without that temporary cookie (which is not stored after you quit your browser) you would have to log on every time you access a new page.

If you do not wish for cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings please consult the "Help" section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). Please note that, if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of our websites.

#### 6. Third Party Content, Sites, and Contributions

Some of our websites may contain content and links to other websites or apps that are operated by third parties. We don't control these third party websites or apps (including whether or not they store cookies) and this Privacy Policy does not apply to them. Please consult the terms and conditions and Privacy Policy of the relevant third party website or app to find out how that site/app collects and uses your information and to establish whether and for what purpose they use cookies.

#### 7. How we look after your data and how long we keep it for

We use a variety of technological and operational security measures to protect your information against any unauthorised access to, unlawful use of, and modification and destruction of any personal data we store.

We will retain your information for as long as is necessary (but no longer than 6 months) to provide you with the services that you have requested from us, or for as long as the law otherwise permits. After this period we will delete your data, unless we have an obligation to retain it for longer (for example for taxation purposes).

Transmission of information over the internet can be insecure, and although we employ measures to protect your information from unauthorised access we cannot always guarantee the security of information sent over the internet.

## **8. Where we store your information**

Where you are interacting with an HPower Group entity located inside the EU, our servers are situated inside the European Economic Area (EEA) and all of the information that we collect about you will be stored on these servers.

In certain circumstances your information may be processed outside of the EEA such as when we engage third parties based outside of the EEA. This could also be for example where you have signed up to exhibit, sponsor or attend an event outside the EEA. In such circumstances, we will take all steps necessary to ensure that any of your information is adequately protected and processed in accordance with this Privacy Policy, and where necessary, we put in place relevant safeguards to ensure the safe processing of your data.

## **9. Your rights in relation to your Personal Data**

You have the right to:

- a. Request a copy of the personal data that we keep about you, by making a request in writing to the Data Protection Officer. Our Data Protection Officers details are provided on Page 1 of this policy. You can ask us to provide the data in a commonly used, machine readable format, and where we are able to; transmit this data to another organisation.
- b. Contact the Data Protection Officer if you are concerned that any of the information we hold on you is incorrect, to have that data corrected.
- c. Contact the Data Protection Officer to ask us to stop processing your data, or withdraw consent where we are relying on consent as the legal basis for any processing of your data.
- d. Contact the Data Protection Officer to request that we delete your personal data.
- e. To lodge a complaint with the data protection authorities if you believe we have not complied with any applicable data protection law. In the UK, the relevant authority is the Information Commissioners Office, you can find their details at [www.ico.org.uk](http://www.ico.org.uk).

## **10. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. Updated privacy policies will be updated on the relevant HPower Group website, or provided to you at your request.

This privacy policy was last updated on: 12<sup>th</sup> April 2021