

Privacy Policy

Pegaso Saddlery is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice so that you are aware of how and why we are using such information.

Data Protection principles

Pegaso Saddlery are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

We will comply with data protection law. This says that the personal information we hold about you must be:

- 1. Used lawfully, fairly and in a transparent way.*
- 2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.*
- 3. Relevant to the purposes we have told you about and limited only to those purposes.*
- 4. Accurate and kept up to date.*
- 5. Kept only as long as necessary for the purposes we have told you about.*
- 6. Kept securely.*

The kind of information we hold about you

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers and personal email address
- Date of Birth
- Gender
- Any relevant physical/medical conditions

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

How is your personal information collected?

We collect personal information about customers from messages, emails, texts or phone calls and face to face provided by yourself or your representatives.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- *Where we need to perform the contract we have entered into with you.*
- *Where we need to comply with a legal obligation.*
- *Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.*
We may also use your personal information in the following situations, which are likely to be rare:

- *Where we need to protect your interests (or someone else's interests).*
- *Where it is needed in the public interest (or for official purposes).*

Situations in which we will use your personal information

We need all the categories of information in the list above (see: The kind of information we hold about you) primarily to allow us to perform our contact with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below:

- [Making decisions to fulfil our contract with you]
- [Contacting you in relation to your contract or other things of potential interest to you]
- [When making an order with a manufacture or supplier]
- Providing some relevant information to the Society of Master Saddlers (SMS) for non-commercial purposes.

Some of the above grounds for processing will overlap and there may be several groups which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

Change of purpose

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another purpose and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal bases which allows us to do so.

Please note that we may process your personal information without your

knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data sharing

We may have to share your data with third parties, including third party providers and other entities in the group.

We require third parties to respect the security of your data and treat it in accordance with the law.

We may transfer your personal information outside the UK.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might we share your personal information with third parties?

We might share your personal information with third parties where required by law, where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third party service providers process your personal information?

“Third parties” include third party service providers (including designated agents), the SMS and other entities within the SMS. The following activities are carried out by third party service providers: Paypal payment services

How secure is your personal information with a third party service provider and other entities within the SMS?

All our third party service providers and other entities within the SMS are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third party service providers to use your personal data for their own purposes. We only permit them to process your personal data for the specified purposes and in accordance with our instructions.

When might your personal information be shared with other entities within the SMS?

We will share your personal information with other entities within the SMS when required to by the SMS for monitoring purposes or if there is a dispute/complaint.

What other third parties might your personal information be share with?

We may share your personal information with other third parties, for example in the context of the possible sale or restricting of the business. We may also need to share your personal information with a regulator or to comply with the law.

Data Security

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

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

Data Retention

How long will your information be kept for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying and legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once our contract with you is complete we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Pegaso Saddlery will retain your personal information for a period of:

- 2 years after your last purchase/saddle fitting

- 12 months after an enquiry which did not lead to a purchase/saddle fitting

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in correction with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access

request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

We have put in place measures to protect the security of your information. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

- **Request correction** of the personal information that we hold about you. This enables you to have and incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information

about you, for example if you want us to establish its accuracy or the reason for processing.

- **Request the transfer** of your personal information to another party. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Becky Simmons, Registered Qualified Saddler, in writing.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Becky Simmons, Registered Qualified Saddler. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer

Pegaso Saddlery does not have a Data Protection Officer but is committed to comply with this privacy notice /We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact Becky Simmons, Registered Qualified Saddler. You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice,

Please contact

Becky Simmons Registered Qualified Saddler

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