



Channel Islands Horseracing Authority

What does this policy cover?

This policy describes how the Channel Islands Horseracing Authority Limited (also referred to as “the CIHA”, “we” or “us”) will make use of data provided to it by and about licensed, registered or permitted personnel and other participants in racing in relation to its Integrity processes. Processing carried out as part of the licence, registration or permit application is handled in the relevant notice/form.

This policy also describes your data protection rights, including a right to object to some of the processing which the CIHA carries out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

What information do we collect from you?

We collect and process personal data about you when you complete your initial licence or registration application and any subsequent renewals. This includes all the information you provide to us in the application forms and any attachments submitted alongside the form.

We collect and process personal data about you when you are subject to an investigation by the CIHA Integrity Team. Where you are charged under the Rules of Racing, we will also receive any representation you make as part of our investigations or proceedings.

What information do we receive from third parties?

Sometimes, we receive information about you from third parties. In particular:

- we may receive information about potential incidents or concerns from members of the public;
- we may receive information about you from foreign racing authorities in relation to your licensing and registration history, conduct and other relevant integrity matters;
- we may receive information about you from other licensed, permitted or registered personnel;
- we may collect information about you from publicly available sources such as the media and the internet;
- we may receive information about your integrity and discipline from racecourses and CIHA and racecourse stewards, and in particular we may receive CCTV footage from racecourses;
- we may also receive information about you from sources such as the press or bookmakers.

How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

- As required by the CIHA to conduct our business and pursue our legitimate interests, in particular:
 - o we will use your information to assess your suitability to be registered under the Rules of Racing;
 - o we will use your information to assess conduct against the Rules of Racing, maintain intelligence and take any enforcement action as required under the Rules of Racing in order to maintain the integrity of the sport. Where this involves your sensitive data or criminal records data, this is also done on the basis of the CIHA’s measures to protect the integrity of horseracing. We may also process such data to prevent or detect unlawful acts;
 - o we will contact you in relation to any rules or other information you may require as a person licensed or registered under the Rules of Racing and any questions we may have in relation to your conduct or the conduct of others;
 - o we will maintain records of our actions in investigating, maintaining intelligence and enforcing the Rules of Racing, including publishing our decisions in the event you are sanctioned under the Rules of Racing;
 - o we will use data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation), such as maintaining intelligence on particular individuals of interest.

- For purposes which are required by law:
 - o in response to requests by government or law enforcement authorities conducting an investigation, or in accordance with our statutory duties, including sharing information with the Gambling Commission and/or the police.

Relying on our legitimate interests

We have carried out balancing tests for all the data processing we carry out on the basis of our legitimate interests, which we have described above.

Who will we share this data with, where and when?

We will share information with racecourses in relation to entries, including any integrity concerns.

We will share information with the Gambling Commission and other relevant statutory bodies, bookmakers and/or the police where this is an appropriate course of action to help enforce the Rules of Racing or ensure that appropriate action is taken by a third party, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws as set out above.

We will share your information with foreign racing authorities as necessary to comply with our obligations under international commitments.

We will share your information with data processors that provide IT services to the CIHA, for the limited purpose of hosting, supporting and maintaining their software.

We will share your information with the official vet of the States of Jersey or the States of Guernsey in relation to any animal welfare concerns.

We will share your information with the individual racecourses where you have been disqualified from racing in order to enforce access controls.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules.

What rights do I have?

You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format and to ask us to share (port) this data to another controller.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement).

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the Data Protection (Jersey) Law 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

How do I get in touch with you, or your data protection officer?

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch at racing@cihorseracing.com or by writing to the Head of Racing or Data Protection Officer at our registered address.

How long will you retain my data?

Where we process registration application data, we do this for as long as you are registered and for ten years after this. We retain top level data recording your name and dates of registration indefinitely in order to keep a record of the sport.

Where we maintain records of racing results, we hold this information indefinitely in order to keep a record of the sport.

Where we hold case files in relation to breaches of the Rules of Racing by registered, licensed or permitted personnel, we hold these for the period of the investigation plus twenty years from the date that the investigation is closed or for as long as you hold a licence, registration and/or permit (whichever the longer) so that we maintain adequate records in the event that you return to horseracing in the same or another registered or licensed profession or otherwise remain a person of interest under the Rules of Racing, by remaining connected to other licensed personnel. In exceptional circumstances, we may retain case files for a longer period where the requirement for retention outweighs the requirement for deletion.

We publish decisions of our Judicial Panel on our website - these remain for seven years from the date of the decision, or in the case of disqualifications lasting longer than seven years, for as long as the disqualification is in place. We retain the written reasons of the Judicial Panel and top level details of the decision indefinitely in order to keep a record of the sport.

Where we process intelligence data, we will do this for a period of twenty years from the date of collection or for as long as you hold a licence, registration and/or permit (whichever the longer) so that we maintain adequate records in the event that you return to horseracing in the same or another registered or licensed profession or otherwise remain a person of interest under the Rules of Racing, by remaining connected to other licensed personnel.

Where we process investigations data, we will do this for the period of the investigation plus twenty years from the date that the investigation is closed or for as long as you hold a licence, registration and/or permit (whichever the longer) so that we maintain adequate records in the event that you return to horseracing in the same or another registered or licensed profession or otherwise remain a person of interest under the Rules of Racing, by remaining connected to other licensed personnel.