



## Channel Islands Horseracing Authority

### Summary of how we use your data

The Channel Islands Horseracing Authority uses the data you provide in this form, and medical attachments, to administer your licence application, administer and regulate horseracing in the Channel Islands and to ensure your health and welfare when racing in Channel Islands.

In order to ensure that your information can be provided to: Racecourse Medical Officers; doctors and nurses employed by the racecourses; physiotherapists; other healthcare professionals; and concussion testing centres and neuropsychologists engaged to assess your care, we ask that you consent to the sharing of your medical information with such third parties. This consent is required for us to share your confidential medical records. The CIHA uses your data otherwise for the purposes of occupational medicine. If you fail to provide this consent, or withdraw it in the future, we may still retain your data and may be required and entitled to prevent you from racing on safety grounds.

The Channel Islands Horseracing Authority may ask you to provide information in relation to your unspent criminal records history. This information will be processed to ensure the integrity of the sport, and we will be entitled to retain this information for this purpose.

The Channel Islands Horseracing Authority may also gather information about you from third party sources, particularly in relation to our integrity activities. More details on the information we collect from third party sources are set out in the CIHA's General Privacy Notice, available on the CIHA website.

The Channel Islands Horseracing Authority may share information in relation to your licence history (including your medical information) with foreign racing authorities in other countries. Some of these authorities may be located outside of the European Economic Area.

### 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 riders, particularly as part of the licence application process. It does not describe the processing carried out by the CIHA in relation to its integrity which are covered in the CIHA's General Privacy Notice available on the CIHA website.

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 application and subsequent renewals and also when you register any non-riding interests pursuant to the Rules of Racing. This includes all the information you provide to us in the application forms and in the medical attachments submitted alongside the form.

We may also generate information about you in order to help you complete your applications and help regulate and manage horseracing and ensure your welfare. In particular, we may hold and use information on whether you need particular assistance with completing your applications, need to be permitted to take specific medications or should be prevented from racing whilst recovering from an illness or injury.

### What information do we receive from third parties?

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

- we receive information about you from training providers in relation to your training and performance;
- we receive, where you have given your consent to the appropriate health professional, assessments or details of your health as part of your medical attachments and otherwise during the course of your licence;
- 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 process your application for a new or renewed licence and ensure your suitability and requirements for licensing or permitting in accordance with measures we take to ensure the integrity of the sport;
  - 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 selecting individuals for anti-doping testing;
  - 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;
- 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 may share information (including your medical information) relating to you with foreign racing authorities so that they may determine your fitness to ride in those jurisdictions or where you wish to participate otherwise in horseracing in a different jurisdiction or in order that they may contact you to request your assistance in an investigation. Some of these authorities may be located outside of the European Economic Area;

We will share your information with the racecourse medical officers for the purposes of assessing your fitness to ride.

Where you give your consent we will share information with third parties with whom you would like us to share data, such as medical specialists to assess an injury you have suffered;

We will share limited information with racecourses in relation to entries and declarations.

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.

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](mailto: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 hold copies of your medical records, we hold these for ten years following the date that your licence expires or is otherwise terminated. We will, where we can contact you, ask if you would like to have your records shared with a relevant medical professional responsible for your ongoing care prior to deleting records.