

ROYAL PIGEON RACING ASSOCIATION & BRITISH HOMING WORLD

PRIVACY NOTICE

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership or contact with us. This notice explains how we comply with the law on data protection, what your rights are and for the purpose of data protection we will be the controller of any of your personal information.

This notice applies to you if you are either:

1. a member of the Royal Pigeon Racing Association (RPRa);
2. a user of the RPRa website (www.rpra.org) and associated sites including but not limited to RPRa One Loft Race site (www.rpraoneloft.org/southern) and RPRa auction site (auction.rpra.org)
3. a user of our stray reporting system

References to **we**, **our** or **us** in this privacy policy are to the Royal Pigeon Racing Association, Unit 35-41 Upper Mills Trading Estate, Stonehouse, Gloucestershire GL10 2BJ and British Homing World, Severn Farm Enterprise Park, Severn Road, Welshpool, Powys, SY21 7DF

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

- Personal contact details such as name, title, postal address, email addresses, telephone numbers, mobile numbers and date of birth;
- Membership details including loft numbers, loft locations, rings records, affiliated organisations, membership payment history and any other items covered by RPRa Rules;
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us such as transfer requests, stray pigeon reporting;
- Any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- Use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT systems identifying information;
- Images in video and/or photograph form and voice recording

2. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information

- via our affiliated organisations when you join them as a member;
- when you logon to our websites to purchase any service or product
- when you make a query and/or complaint
- or when you correspond with us by phone, email or some other way.

This information may be held at Club, Region and /or HQ level.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps us analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its

operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

3. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories for your information and our lawful basis for being able to do this.

Purpose	Personal Information Used	Lawful basis
To administer any membership you have with us and managing our relationship with you, and dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences if supplied by you.	This is necessary to enable us to properly manage and administer your membership contract with us.
To arrange and manage any contracts for the provision of any merchandise, products and/or services	All contact and membership details, transaction and payment information	This is necessary to enable us to properly administer and perform any contract for the provision of merchandise, products or services.
To send you information such as stray reports and ring transfer notifications.	All contact details	We have a legitimate interest to enable us to properly manage and administer services you request.
To send you marketing information if you have explicitly instructed us to do so.	All contact and membership details and marketing preferences.	Where you have given your explicit consent to do so, or we consider the sending of such information to be in your legitimate interests.
To answer your queries and complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issue.
Retention of records	All personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and in some cases, we may have a legal or regulatory obligation to retain records.
Security of our IT systems	Your usage of our IT systems and online portals	We have a legitimate interest to ensure that our IT systems are secure.

For the purposes of promoting the sport of pigeon racing and events organised by us.	Images in video and /or photographic form.	Where you have given us your explicit consent to do so, or where the use of such images is compliant with the 'Special Purposes' as defined within Clause 24(1) or the GDPR
To comply with health and safety requirements	Records of attendance	We have a legal obligation and a legitimate interest to provide you and members of our organisation with a safe environment in which to participate in the sport and at events organised by us.

For some of your personal information you will have a legal and contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate you position as a member. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting Us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain benefits or services to you.

4. DIRECT MARKETING

Email, post and SMS marketing: We do not currently participate in direct marketing.

5. LINKS TO OTHER WEBSITES

Our websites may contain links to other websites run by other organisations. This privacy policy applies only to our websites, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access those using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- Any party approved by you

- **To any governing bodies or regional bodies or affiliated bodies for the pigeon racing sport** to allow them to properly administer the sport on a local, regional, national and international level.
- **Other service providers:** for example payment processors, data analysis, contractors or suppliers and IT services (including website providers, printers, magazine distributors).
- **Our supply chain partners & sub-contractors**, such as couriers, import/export agents, shippers;
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above.

7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards and required under data protection laws. For further details please contact us by using the details set out in the “**Contact Us**” section below.

8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason we collected it from you. However, in some cases personal information may be retained on a long-term basis; for example, personal information that we need to retain for legal purposes will normally be retained in accordance with the usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of six years after your last contact with us. Exceptions to this rule are:

- Public members’ personal information relating to stray reports may be retained up to three months.
- Information that may be relevant to personal injury claims or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked for us.
- Past members’ personal information will be kept up to 20 years after your membership lapses to enable us to assist the repatriation of strays or validation of pigeon performances.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can contact us by using the details set out in the “**Contacting Us**” section below.

9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- The right to be informed about how your personal information is being used;
- The right to access the personal information we hold about you;
- The right to request the correction of inaccurate personal information we hold about you;
- The right to request the erasure of your personal information in certain limited circumstances;
- The right to restrict processing of your personal information where certain requirements are met;
- The right to object to the processing of your personal information;
- The right to request that we transfer elements of your data either to you or another service provider; and
- The right to object to certain automated decision-making processes using personal information.

You should note that some of these rights, for example the right to request us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your rights to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the information commissioner's website at <https://ico.org/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the "Contacting Us" section below.

If you are unhappy with the way we are using your personal information, you can complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

10. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

11. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email gdpr@rpra.org or write to us at Royal Pigeon Racing Association, Unit 35-41 Upper Mills Trading Estate, Stonehouse, Gloucestershire GL10 2BJ or British Homing World, Severn Farm Enterprise Park, Severn Road, Welshpool, Powys, SY21 7DF

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