



PRIVACY POLICY

Updated: May 2019

TurfTrax takes your privacy very seriously.

This Privacy Policy sets out how we use and look after the personal information we collect. We are the data controller, responsible for the processing of any personal data we are provided. We take reasonable care to keep your information secure and to prevent any unauthorised access to or use of it.

The General Data Protection Regulation (GDPR)

The GDPR is a new European regulation for the protection of personal data that came into force on 25 May 2018 and has been put into UK law through the Data Protection Bill which was unveiled by the government in August 2017. Before 25 May 2018, the 1998 and 2003 Data Protection Acts apply.

What personal information does TurfTrax Limited hold?

Personal data means any information about an individual from which that individual can be identified.

We collect, use, store and transfer some personal data relating to our staff, customers and suppliers and other business-related parties.

This personal data is only used for the purpose of efficiently running of the business.

We can hold names, addresses, email addresses, phone numbers and any preferences explicitly provided to us.

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What does TurfTrax do with the data?

We will only use personal data for any purpose for which it has been specifically provided.

The reason we need personal data is to be able to run the business and update, correspond and manage events in a timely manner. Our lawful basis for processing your personal data is that we have a contractual obligation to you or your organisation to provide or be provided with services.



We use the data we collect in the following ways:

- We use the data to maintain records within our internal systems, such as Invoicing, CRM and Supplier systems.
- We use the data for Customer and Supplier communications.
- Direct marketing purposes to communicate with industry prospects.

We will only publish your personal data in a public domain with the express authority of the organisation and / or the individual as required.

How we collect information

We collect data in the following ways:

- Through Capsule, our online CRM system.
- Through online systems that we use to efficiently administer the business.
- Individuals can subscribe to our mailing lists online.
- Social Media

Who we share your personal data with

- Appropriately authorised staff.
- We may pass information to the Regulator.
- We may share your personal data with selected third parties, suppliers and sub-contractors such as banks to make payments. Third-party service providers will only process your personal data for specified purposes and in accordance with our instructions.
- We may disclose your personal information to third parties to comply with a legal obligation.

Security

TurfTrax data is held in the following places:

- Our secure, password-protected CRM system, our online banking system which can only be accessed by authorised individuals.
- Our in-house IT systems which can only be accessed by authorised individuals.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.



How long do we hold your personal data?

We keep personal data while they continue to hold a relationship with TurfTrax or otherwise actively involved with the Company. We will delete this data 12 months after the individual has ceased to hold a relationship, or sooner if specifically requested and we are able to do so.

We may need to retain some personal data for longer for legal or regulatory purposes. For example the UK tax authority requires TurfTrax to hold certain information for 7 years.

Data removal

If you do not wish us to use your data, you can:

- Request to unsubscribe via any of the direct marketing communications that we send.
- Email the Company Administrator on turftrax@turftrax.co.uk and request removal.

Email our Data Controller Mr Steve Bird who can be emailed on steve.bird@turftrax.co.uk

What restrictions are there on the use of TurfTrax data for marketing?

- Communications can only be sent when:
 - There is legitimate interest for the communication.
 - individuals have opted in to receive them.
- All communications must be relevant and proportionate.
- All communications must contain a clear opportunity to opt-out from future correspondence.
- All requests to opt-out are honoured.
- Data used for marketing must be recently updated (i.e. within the past month) to ensure it is as up to date as possible.



Your rights regarding your personal data

As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data; to restrict or object to certain kinds of processing of your personal data, including direct marketing; to the portability of your personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.

As a data subject you are not obliged to share your personal data with the Company. If you choose not to share your personal data with us, we may not be able to fulfil the Companies contractual obligations, and in such a situation we will make the individual aware.

We may update this Privacy Notice from time to time and will inform you to any changes in how we handle your personal data.