

Privacy and Cookies Policy

1. Introduction

1.1 We are committed to safeguarding the privacy of our website visitors and members.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and members; in other words, where we determine the purposes and means of the processing of that personal data.

1.4 In this policy, “we”, “us” and “our” refers to the Great British Bonus Scheme (the “**GBB Scheme**”), founded by The Thoroughbred Breeders’ Association or “The TBA” for short. For more information about us, see Section 11.

2. How we use your personal data

2.1 In this Section 2 we have set out:

- (a) the general categories of personal data that we may process;
- (b) the purposes for which we may process personal data; and
- (c) the legal bases of the processing.

2.2 We process your GBB Scheme account registration data (“**account data**”). The account data includes your name, details about your horse(s), company name (if applicable), address, date of birth, contact telephone numbers and email address. If you are a member of The TBA, we will also process your TBA membership number to validate any discounts available. The account data may be processed for the purposes of operating our website, providing the GBB Scheme, ensuring the security of our website, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of the GBB Scheme, to which you have registered.

2.3 We process your personal data that are provided in the course of your use of the GBB Scheme (“**service data**”). The service data may include the account data specified above plus any bonuses you have received and details of the performance of your horse(s). The service data is processed for the purposes of operating our website, providing the GBB Scheme, ensuring the security of our website and the GBB Scheme, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of the GBB Scheme services which you have registered for.

2.4 We process information contained in any enquiry you submit to us regarding the GBB Scheme (“**enquiry data**”). The enquiry data are processed for the purposes of offering and marketing relevant GBB Scheme services to you. The legal basis for this processing is our legitimate business interests, namely responding to enquiries in an efficient and helpful manner.

2.5 We process information relating to transactions that you enter into with us as a result of your registration with the GBB Scheme (“**transaction data**”). The transaction data includes your contact details, your card details and the transaction details. The transaction data are processed for the purpose of providing the GBB Scheme and keeping proper records of those transactions. The legal basis for this processing is the performance of the GBB Scheme registration contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of the GBB Scheme.

2.6 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (“**notification data**”). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is your consent to receive such email notifications and / or newsletters as part of your registration to the GBB Scheme.

2.7 We process information contained in or relating to any communication that you may send to us (“**correspondence data**”). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of the GBB Scheme, our website and communications with our users.

2.8 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

2.9 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

2.10 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.11 Please do not supply any other person's personal data to us, unless you have permission from that person to do so.

3. Providing your personal data to others

3.1 We disclose the names of GBB Bonus recipients to the Horserace Betting Levy Board because the Horserace Betting Levy Board part fund the Bonus payments. We share this data with them in our legitimate business interests, namely the transparency of the GBB Scheme.

3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.3 We may disclose your postal or email address to our email and postal subcontractors insofar as reasonably necessary for posting your mailings from the GBB Scheme and emailing membership information.

3.4 Financial transactions relating to our website and services are handled by our payment services providers, namely SagePay. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://www.sagepay.co.uk/policies/privacy-policy>

3.5 Weatherbys Limited assist The TBA with administering the GBB Scheme, thus we may disclose your data to them as our data processor.

3.6 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. International transfers of your personal data

4.1 We do not transfer your information outside of the European Economic Area save to our marketing Service Providers, as set out below:

The Rocket Science Group LLC d/b/a MailChimp.

4.2 The hosting facilities for our website are situated in UK, which meets the standards required by the EU's data protection laws.

4.3 You acknowledge that personal data that you submit for publication through our website or the GBB Scheme may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

5. Retaining and deleting personal data

5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

6.1 We may update this policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7. Your rights

7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;

(g) the right to complain to a supervisory authority; and

(h) the right to withdraw consent.

7.3 Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

7.4 There are exclusions to the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

7.5 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.6 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.7 You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this Section 7.

8. About cookies

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies that we use

9.1 We use cookies for the following purposes:

(a) authentication – we use cookies to identify you when you visit our website and as you navigate our website. This cookie is strictly necessary for the performance of the website so does not require your advance consent.

(b) status – we use cookies to help us to determine if you are logged into our website. These cookies are not linked to a persistent identifier. This cookie is strictly necessary for the performance of the website so it does not require your advance consent.

(c) personalisation – we use cookies to store information about your preferences and to personalise the website for you. This cookie is not linked to a persistent identifier. This cookie is strictly necessary for the performance of the website so it does not require your advance consent.

(d) security – we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally. This cookie is strictly necessary for the performance of the website so does not require your advance consent.

(e) announcements – we use cookies to help us to store your responses to announcements that are made on the website, such as the items in your basket if you are not logged into your account. This cookie is strictly necessary for the performance of the website so does not require your advance consent.

(f) cookie consent – we use cookies to store your preferences in relation to the use of cookies more generally. This cookie is strictly necessary for the performance of the website so does not require your advance consent.

10. Managing cookies

10.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

(a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);

(b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);

(c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);

(d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

(e) <https://support.apple.com/kb/PH21411> (Safari); and

(f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

10.2 Blocking all cookies will have a negative impact upon the usability of our website.

10.3 If you block cookies, you will not be able to use all the features on our website.

11. Our details

11.1 This website is owned by The TBA.

11.2 We are registered in England and Wales under registration number 07073259, and our registered office is at Stanstead House, 8, The Avenue, Newmarket, Suffolk, CB8 9AA.

11.3 Our principal place of business is at the registered address above.

11.4 If you have any questions about your personal data or this Privacy Policy, you can contact The TBA:

(a) by post, to the postal address given above;

(b) using our website contact form;

(c) by telephone, on 01638 661321; or

(d) by email, using the email address published on our website from time to time oralix.jones@thetba.co.uk.

12.5 If you have any questions about the GBB Scheme, please refer to the Great British Bonus FAQ's. If you can't find the information you're looking for, you can contact Weatherbys:

(a) by post, to The GBB Administration Team, Weatherbys Limited, Sanders Road, Wellingborough, Northamptonshire, NN8 4BX.

(b) by telephone: 01933 440077; or

(c) by email, to info@greatbritishbonus.co.uk