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HPA PRIVACY POLICY

Who we are

The Hurlingham Polo Association, (HPA) is the national governing body of the sport of polo and we respect and take your privacy seriously. This Privacy Notice describes our privacy practices regarding the collection, use, and disclosure of your information through the HPA websites, Membership Platform and other services we provide both online and offline (collectively referred to as “Services”), along with our marketing and advertising practices.

Sport 80 are the HPA partner who have designed and run the cloud-based management tool specifically designed for the sports industry.

The HPA operates the website www.hpa-polo.co.uk (the “website”). Sport 80 manage the Membership Platform (the “platform”).

The HPA, Is a data controller under the data protection rules and our Data Protection Officer is Will Mawby contactable at the HPA, Manor Farm, Little Coxwell, Faringdon, OXON, SN7 7LW or via email at will@hpa-polo.co.uk.

Information we gather.

The HPA gathers certain information about you. Information about you is also used by our affiliated entities, namely HPA accredited polo clubs and overseas polo organisations.

We collect information in the following ways:

Information you give us.

When you become a member of the HPA you will give us information. You may also give us information when using our Website or Membership platform. Information may include your name, date of birth, postal address, email address, phone number, financial and credit card information, disability, ethnicity, your polo handicap and relevant qualifications.

Information we get from your use of our Website and services.

Each time you visit our Website, we may automatically collect certain information. This information includes technical information, such as Internet Protocol (IP) addresses used to connect your computer to the internet, your login information, browser type and version, browser plug-in types and versions, operating system and platform and information relating to what pages you have viewed (e.g. using cookies as described further below);

Information about you from third parties.

We work closely with third parties (including, for example, The HPA’s business partners, associate bodies, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers,) and may receive information about you from them.

How we may use your information

We rely on the legitimate interest basis to use your personal information in some circumstances. For example, when you apply to become a member of the HPA, we have a legitimate organisational interest to use your information to respond to you and give you the benefits of being a member as explained on the Website regarding features of being a member.

We may use your information for a number of purposes including the following:

1. Compliance with legal, regulatory and corporate governance obligations and good practice

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2. To provide you with information about our work or our activities that you have agreed to receive;
3. Building profiles

When building a profile, we may analyse geographic, demographic and other information relating to you in order to better understand your interests and preferences in order to contact you with the most relevant communications. We may use additional information from third party sources when it is available. Such information is compiled using publicly available data about you, for example addresses, listed Directorships or typical earnings in a given area.

We do not carry out profiling in relation to children.

1. Ensure we know how you prefer to be contacted
2. Keep a record of your relationship with us.

We will use the information we get from your use of our Website and services to:

1. administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
2. improve our Website to ensure that content is presented in the most effective manner for you and for your computer;
3. allow you to participate in interactive features of our service, when you choose to do so;
4. as part of our efforts to keep our Website safe and secure;
5. measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
6. make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them; and
7. any other reasonable purposes of The HPA, acting always in accordance with the data protection law (as amended from time to time).

We will use the information you give us to:

1. perform services you have requested (such as providing you with Membership Benefits or providing you with information you have asked for);
2. administer the sport of polo, The HPA, for instance by organising tournaments;
3. provide you with information about other goods and services that we offer that are similar to those that you have already purchased or enquired about;
4. where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please email enquiries@hpa-polo.co.uk
5. notify you about changes to our service, including but not limited to any changes to the Member Benefits;
6. ensure that content from our Website is presented in the most effective manner for you and for your computer; and
7. any other reasonable purposes of The HPA, acting always in accordance with the data protection law (as amended from time to time).

Marketing

We may contact you for marketing purposes by email if you have agreed to be contacted in this manner. By subscribing to HPA emails or opting in to email communication from the HPA, you grant us the right to use the email for both email marketing purposes and advertisement targeting.

We may include information from other organisations in these communications.

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It is your choice as to whether you want to receive information about our work, how we raise funds and the ways you can get involved. If you do not want us to use your personal information in these ways please tick the relevant box situated on the form on which we collect your data.

You may opt-out of our marketing emails at any time by clicking the 'unsubscribe' link at the end of our marketing emails.

You can also change any of your contact preferences at any time including telling us that you don't want us to contact you for marketing purposes by telephone, or by post by using the online Members' platform or contacting our membership services team on enquiries@hpa-polo.co.uk Should you have a query regarding this please contact our Data Protection Officer.

We will not use your information for marketing purposes if you have indicated that you do not wish to be contacted for such purposes. However, we will retain your details on a suppression list to help ensure that we do not continue to contact you.

Information Sharing and Disclosure

We may share your information with the following selected third parties:

1. Associate bodies such other HPA affiliated clubs and other recognised International Polo Associations in order they may communicate with you regarding Polo events and allow the associate bodies to manage the running of the sport in their areas.
2. Analytics and search engine providers that assist us in the improvement and optimisation of Our Site.

We may disclose your personal information to third parties:

1. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
2. If The HPA or substantially all of its assets are acquired by a third party, in which case personal data held by it about individuals who have applied for Membership (whether successfully or unsuccessfully) will be one of the transferred assets;
3. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply other agreements; or
4. to protect the rights, property, or safety of The HPA, Our Members, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction. *No data outside of EEA?*

We require these third parties to comply strictly with our instructions and data protection laws and we will make sure that appropriate controls are in place. We enter into contracts with all of our data processors and regularly monitor their activities to ensure they are complying with The HPA's policies and procedures.

We may disclose your personal information to third parties if we are under a duty to disclose your personal data in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

Users under 18

If you are under 18 and would like to get involved, please ensure that you have consent from a parent or guardian before giving us your personal information. When we collect data about a child or young person aged under 18 we will make it very clear as to the reasons for collecting this data and how it will be used.

Keeping your records

We keep records only for as long as required to operate the service in accordance with legal requirements and tax and accounting rules.

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Where we may store your information

The data that we collect from you will be transferred to, and stored at The HPA's registered office and online systems.

By submitting your personal data, you agree to this transfer, storing or processing.

The HPA will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Your rights

You have the right to:

1. Have any inaccuracies in your data corrected. If you would like to update the details we hold about you other than online, please contact our Data Protection Officer via email or by letter.
2. Request that we delete your personal data.
3. Object to profiling. Profiling is any automated processing of personal data to evaluate any feature of your behaviour preference or location, including online tracking and behavioural advertising.
4. Request that we do not process your personal data for marketing purposes.
5. You have a right to request a copy of the personal information we hold about you. We require you to prove your identity with two pieces of approved identification. Please address requests to the Data Protection Officer and we will respond within one month, of receipt of your written request and confirmed ID. Please provide as much information as possible about the nature of your contact with us to help us locate your records. This request is free of charge unless the request is manifestly unfounded or excessive.

Changes to this notice and the way we treat personal information

We may update the terms of this privacy notice at any time, so please do check it from time to time.

We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us or by placing a prominent notice on our Website. By continuing to use our Website you will be deemed to have accepted such changes.

Enquires and Complaints

The Data Protection Officer is the first point of contact regarding any enquires arising from this Privacy Notice. Where possible, please raise all enquires in writing.

If you are unhappy with our work or something that we have done or failed to do, please inform us in writing. The HPA will acknowledge receipt of all complaints and will endeavour to investigate the complaint within 15 working days

All complaints should be sent to:

The HPA
Manor Farm, Little Coxwell
Faringdon
Oxon
SN7 7LW

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You may also complain directly to the Information Commissioner's Office if you are concerned with how we are handling your personal information using their online form which can be found here: <https://ico.org.uk/concerns/handling/>.

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