



HORSE SPORT

IRELAND

Horse Sport Ireland Data Protection Policy

1. Introduction

In its everyday business operations, Horse Sport Ireland (HSI) makes use of a variety of data about identifiable individuals, including data about:

- Current, past and prospective employees
- Customers
- Users of its websites and digital platforms
- Subscribers
- Other stakeholders

In collecting and using this data, HSI is subject to a range of legislation controlling how such activities may be carried out and the safeguards that must be put in place to protect personal data.

The purpose of this policy is to set out the relevant legislation and describe the steps HSI is taking to ensure full compliance.

This policy applies to all systems, people and processes that constitute the organisation's information systems, including board members, directors, employees, suppliers, contractors and other third parties who have access to HSI systems.

2. Scope

This policy applies to all personal data processed by HSI in both electronic and manual formats.

It applies to all employees, consultants, contractors and third parties who have access to personal data held by or on behalf of HSI.

Data protection compliance is a shared responsibility across Horse Sport Ireland.

Key responsibilities include:

Board of Directors

Providing oversight of data protection governance and ensuring appropriate policies and controls are in place.

Chief Operations Officer

Responsible for overseeing HSI's data protection compliance and implementation of this policy.

CEO, CFO, Managers and Department Heads

Ensuring that staff within their areas comply with this policy and follow appropriate procedures when handling personal data

All Staff and Contractors

Ensuring that personal data is handled securely and in accordance with this policy and applicable procedures

3. Legislative Framework

Horse Sport Ireland complies with:

- **The General Data Protection Regulation (EU) 2016/679 (GDPR)**
- **The Data Protection Acts 1988–2018 (Ireland)**, which give further effect to the GDPR under Irish law.

4. The General Data Protection Regulation

The GDPR is one of the most significant pieces of legislation affecting the way HSI carries out its information processing activities. Significant fines are applicable if a breach occurs, with penalties of up to €20 million or 4% of global turnover (whichever is greater).

It is HSI's policy to ensure that compliance with GDPR and associated legislation is clear and demonstrable at all times.

5. Definitions

The key definitions under the GDPR relevant to this policy include:

Personal data – any information relating to an identified or identifiable natural person ('data subject').

Processing – any operation or set of operations performed on personal data, whether automated or manual, including collection, storage, use, disclosure, erasure or destruction.

Controller – the natural or legal person, public authority or other body which determines the purposes and means of processing personal data.

Personal Data Breach – a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

6. Principles Relating to the Processing of Personal Data

HSI adheres to the fundamental principles of GDPR, ensuring that personal data is:

1. **Processed lawfully, fairly and transparently**
2. **Collected for specified, explicit and legitimate purposes** (purpose limitation)
3. **Adequate, relevant and limited** to what is necessary (data minimisation)
4. **Accurate and kept up to date** (accuracy)
5. **Kept no longer than necessary** for its purpose (storage limitation)
6. **Processed securely** to protect against unauthorised access, loss or damage (integrity and confidentiality)

HSI is responsible for and can demonstrate compliance with these principles (**accountability**).

Horse Sport Ireland implements appropriate technical and organisational measures to ensure the security and confidentiality of personal data.

These measures include, but are not limited to:

- Access controls restricting data access to authorised personnel only
- Secure IT systems and password protection
- Encryption or pseudonymisation where appropriate
- Regular system monitoring and security updates
- Staff confidentiality obligations
- Secure storage and disposal of physical records

These measures are regularly reviewed to ensure that personal data remains protected against unauthorised access, accidental loss, destruction or damage.

7. Rights of the Individual

Data subjects have the following rights under GDPR:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision-making and profiling

These rights are supported by internal procedures to ensure responses within the required timescales (see **Table 1**).

HSI will respond to requests relating to the exercise of data subject rights without undue delay and within one month of receipt of the request.

Where a request is particularly complex or where multiple requests are received from the same individual, Horse Sport Ireland may extend the response period by up to two further months. Where this occurs, the individual will be informed within one month of receipt of the request and provided with the reasons for the extension.

Horse Sport Ireland will not charge a fee for responding to an initial request for access to personal data.

However, where a request is manifestly unfounded or excessive, in particular because it is repetitive, Horse Sport Ireland may either charge a reasonable fee based on the administrative costs of providing the information or refuse to act on the request.

Where a data subject requests additional copies of personal data that has already been provided following an access request, Horse Sport Ireland may charge a reasonable fee based on administrative costs.

Where a request is refused or a fee is applied, the individual will be informed of the reasons for the decision and advised of their right to lodge a complaint with the Data Protection Commission.

“Horse Sport Ireland may request proof of identity before responding to a data subject request where necessary.”

8. Lawfulness of Processing

HSI ensures that every processing activity has a lawful basis under GDPR. The lawful bases include:

1. **Consent** – freely given, specific and informed.
2. **Performance of a contract** – necessary to fulfil or prepare for a contract with the data subject.
3. **Legal obligation** – required to comply with national or EU law.

4. **Vital interests** – necessary to protect someone’s life or well-being.
5. **Public interest or official authority** – necessary for the performance of a task carried out in the public interest.
6. **Legitimate interests** – necessary for HSI’s legitimate business interests, provided these do not override data subject rights.

In certain circumstances, Horse Sport Ireland may process special category data, such as health information or other sensitive personal data. Where such data is processed, HSI will ensure that an appropriate lawful basis under Article 9 of the GDPR applies and that additional safeguards are implemented to protect the rights and freedoms of individuals.

Horse Sport Ireland recognises that children require additional protection when their personal data is processed. Where personal data relating to children is processed, HSI will ensure that appropriate safeguards are applied and that parental or guardian consent is obtained where required under applicable data protection legislation.

9. Privacy by Design and Default

HSI adopts the principle of **Privacy by Design**, ensuring that data protection is embedded into all systems and processes from the outset.

A **Data Protection Impact Assessment (DPIA)** will be undertaken for all new or significantly changed systems involving personal data, assessing:

- The nature and purpose of processing
- Necessity and proportionality
- Risks to individuals
- Controls required to mitigate those risks

Where appropriate, techniques such as **data minimisation** and **pseudonymisation** will be implemented.

10. Contracts Involving the Processing of Personal Data

HSI ensures that all third-party relationships involving personal data are governed by a written contract compliant with Article 28 of the GDPR, setting out the responsibilities of both parties and appropriate data protection clauses.

11. International Data Transfers

Transfers of personal data outside the European Union are reviewed in advance to ensure compliance with GDPR restrictions.

Transfers will only occur where:

- The European Commission has deemed the destination country to have adequate data protection standards; or
- Appropriate safeguards (such as Standard Contractual Clauses or Binding Corporate Rules) are in place.

11A. Horse Sport Ireland will only retain personal data for as long as necessary to fulfil the purposes for which it was collected, including satisfying legal, regulatory, accounting or reporting requirements.

HSI maintains a Data Retention Schedule which sets out the retention periods for different categories of personal data. Once personal data is no longer required, it will be securely deleted, destroyed, or anonymised in accordance with HSI's records management procedures.

12. Data Protection Responsibility

Horse Sport Ireland has designated the Chief Operations Officer as the person responsible for overseeing data protection compliance and ensuring adherence to this policy and applicable data protection legislation.

Please contact dataprotection@horsesportireland.ie

All staff handling personal data must follow this policy and complete mandatory data protection training.

13. Personal Data Breach Management

All suspected personal data breaches must be reported internally to the designated data protection contact immediately upon discovery. In the event of a personal data breach likely to result in a risk to individuals' rights or freedoms, HSI will:

- Notify the **Data Protection Commission (DPC)** within **72 hours** of becoming aware of the breach;
- Record the breach and remedial actions taken;
- Notify affected individuals without undue delay if the breach poses a high risk to their rights or freedoms.

Failure to comply with this policy may result in disciplinary action and may expose Horse Sport Ireland to legal, financial and reputational risks.

14. Accountability and Continuous Compliance

To ensure ongoing compliance, HSI will:

- Maintain clear documentation of all processing activities;
- Review and update data protection procedures regularly;
- Provide annual data protection training to staff;
- Ensure routes are available for data subjects to exercise their rights;
- Embed privacy considerations into project design and procurement.

The following records are maintained:

- Purposes of processing
- Categories of data and recipients
- Details of international transfers and controls
- Retention schedules
- Technical and organisational security measures

15. Complaints and Escalation

If an individual believes that HSI has not handled their personal data properly, they may raise a complaint with HSI at dataprotection@horsesportireland.ie.

If the issue remains unresolved, they may contact the **Data Protection Commission (DPC)**:

Data Protection Commission
21 Fitzwilliam Square South, Dublin 2, D02 RD28
Website: www.dataprotection.ie

Table 1 – Timescales for Data Subject Requests

Data Subject Request	Timescale
Right to be informed	When data is collected (if supplied by the data subject) or within one month (if not)
Right of access	Without undue delay and within one month*
Right to rectification	Without undue delay and within one month*
Right to erasure	Without undue delay and within one month*
Right to restrict processing	Without undue delay and within one month*
Right to data portability	Without undue delay and within one month*
Right to object	On receipt of objection
Rights in relation to automated decision-making and profiling	Not applicable

* Where requests are complex or numerous, Horse Sport Ireland may extend the response period by up to two further months in accordance with Article 12(3) of the GDPR. Where this occurs, the individual will be informed within one month of receipt of the request and provided with the reasons for the extension.

16. Contact Information

Horse Sport Ireland

1st Floor, Beech House, Millennium Park, Osberstown, Naas, Co. Kildare, W91 TK7N

Email: dataprotection@horsesportireland.ie

Website: www.horsesportireland.ie

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