



## **PONTEFRACT RACECOURSE CONTRACTORS PRIVACY NOTICE**

### **1 INTRODUCTION**

- 1.1 The Ponterfract Park Race Company Ltd (“**we**” or “**us**”) are a data controller of the personal information we receive from or collect about you. We are registered as a data controller with the Information Commissioner's Office and our registration number is ZA034218. We can be contacted at The Administration Offices, Ponterfract Racecourse, Ponterfract Park, Park Road, Ponterfract, West Yorkshire WF8 4QD.
- 1.2 We are committed to protecting the privacy and security of your personal information.
- 1.3 This Privacy Notice describes how we collect and use personal information about you during and after your relationship with us.
- 1.4 This Notice applies to all current, former, and future contractors who are instructed by us to carry out works on our behalf at Ponterfract Racecourse. This Notice does not however form part of any contract which may exist or have existed between us and we may update or amend it at any time.
- 1.5 For more information about our approach to data protection, please see our Privacy Policy which can be viewed on our website [www.ponterfract-races.co.uk](http://www.ponterfract-races.co.uk)
- 1.6 The contents of this Privacy Notice are overseen by our Data Protection Manager who can be contacted at the address stated in 1.1 above or by email to [richard@ponterfract-races.co.uk](mailto:richard@ponterfract-races.co.uk).

### **2 THE KIND OF INFORMATION WE HOLD ABOUT YOU**

- 2.1 We may collect, store, use and share information about you in order to carry out our activities as a business. In particular, we will process personal data for the purposes of complying with legal obligations, performing the contract we have entered into with you and pursuing our legitimate interests where the law permits or requires it.
- 2.2 We will collect your personal contact details such as name, title, address, telephone number(s) and email address.
- 2.3 We will also collect your Bank or Building Society Details, tax status, VAT registration and other Government identifications details.
- 2.4 We will also collect details of the work you do, and performance and conduct information relative to that work.
- 2.5 We may also collect information about your usage of our website as well as information about you from emails or letters that you send to us.
- 2.6 We may also collect details of any disabilities or other health issues that you or your staff have if we need them to administer your visit to our racecourse.
- 2.7 We will record CCTV footage of you when you attend the racecourse.
- 2.8 We may also record and monitor incoming telephone calls.

### **3 HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

- 3.1 We collect personal information about you through the application and recruitment process, either directly from you or sometimes from an employment agency or

background check provider. We may sometimes collect additional information from third parties including former clients, credit reference agencies or other background check agencies.

- 3.2 We will collect additional personal information in the course of job-related activities throughout the period during which you work for us.
- 3.3 We will also collect your name and email address and that of your employees and workers if, you, or they use our free wifi network at the racecourse.

#### **4 HOW WE WILL USE INFORMATION ABOUT YOU**

- 1.1 Most commonly, we will use your personal information in the following circumstances:
  - (a) where we need to perform the contract we have entered into with you;
  - (b) where we need to comply with a legal obligation;
  - (c) where we consider it necessary for our legitimate interests (or those of a third party).
- 1.2 We may also use your personal information where we need to protect your interests (or someone else's interests) or where it is needed in the public interest.
- 1.3 If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of your workers).
- 1.4 Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.
- 1.5 Data protection legislation identifies certain "special categories" of data, including information about medical conditions.
- 1.6 We may use information about physical or mental health, or disability, to ensure the health and safety of anyone carrying out work on our behalf at the racecourse and to assess their fitness to carry out that work and, to provide appropriate workplace adjustments.
- 1.7 We do not need your consent if we use special categories of your personal information to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with details of the information that we would like and the reason(s) we need it, so that you can consider whether you wish to consent.
- 1.8 We will usually only collect information about criminal convictions if it is appropriate given the nature of the work being carried out and where we are legally able to do so. Where appropriate, we may collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you or others in the course of you carrying out work for us.
- 1.9 We do not envisage that any decisions will be taken about you using automated means. We will notify you in writing if this position changes.

#### **5 DATA SHARING**

- 5.1 We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you, or where we have another legitimate interest in doing so.
- 5.2 "Third parties" includes third-party service providers (including other contractors and designated agents).

- 5.3 Our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.
- 5.5 We may share your personal information with other third parties, for example if our business or assets are to be acquired by another company. We may also need to share your personal information with a regulator or otherwise to comply with the law.
- 5.5 We may transfer personal information about you outside of the European Economic Area (EEA). To ensure that your personal information receives an adequate level of protection we will put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection.

## **6 DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we aim to limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

## **7 DATA RETENTION**

- 7.1 We will only retain your personal information for as long as we consider it necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, the applicable legal requirements and other factors that we consider relevant.
- 7.2 We retain CCTV footage for a period of 21 days.
- 7.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **8 YOUR DUTY TO INFORM US OF CHANGES**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

## **2 YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION**

- 2.1 Under certain circumstances and subject to certain conditions, by law you have the right to:
- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you.
  - **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
  - **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove

your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
  - **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
  - **Request the transfer** of your personal information to another party.
- 2.2 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- 2.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
- 2.4 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing. To withdraw your consent, please contact our Data Protection Manager (see Paragraph 1.6 above). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
- 2.5 If you are not satisfied with our response to any data protection issues you raise with us you have the right to make a complaint to the Information Commissioners Office (ICO). The ICO is the authority in the UK which is tasked with the protection of personal data and privacy.

### **3 CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this Privacy Notice at any time. We may also notify you in other ways from time to time about the processing of your personal information.

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