OPERATION CENTAUR

# Privacy Policy

| Version | Date | Action | By |
|---|---|---|---|
| 1 | June 2026 | Written | Sammi Woodward |

## Purpose

Operation Centaur Ltd, TRP Working Horses Ltd and Richmond Park Polo Club ("the Organisations", "we", "our" or "us") are committed to protecting and respecting the privacy of all individuals whose personal information we collect and process.

This Privacy Policy explains how we collect, use, store, protect and share personal information in connection with our activities, services, facilities, events, employment, volunteering opportunities, equine-assisted programmes, polo activities and associated business operations.

We are committed to processing personal information fairly, lawfully and transparently in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable legislation.

## Scope

This Policy applies to all personal information collected by or on behalf of:

- Operation Centaur Ltd
- TRP Working Horses Ltd
- Richmond Park Polo Club

The Policy applies to information relating to, but not limited to:

- Employees
- Freelancers and contractors

- Volunteers
- Riders and polo players
- Clients and customers
- Therapy participants
- Horse owners
- Visitors
- Event participants
- Suppliers and service providers
- Individuals making enquiries or engaging with our services

## Information We Collect

Depending on your relationship with us, we may collect the following information:

### Personal Information

- Name
- Date of birth
- Address
- Telephone numbers
- Email addresses
- Emergency contact details
- Photographs and video recordings
- Identification documents
- Driving licence information
- Insurance information
- Qualifications and certifications
- Employment or volunteering information
- Attendance and participation records

### Medical and Welfare Information

Where relevant and appropriate, we may collect information relating to:

- Medical conditions
- Allergies
- Medication
- Emergency medical information
- Injury history
- Recent surgeries

- Accessibility requirements
- Welfare and safeguarding information

This information is collected only where necessary to support health, safety, safeguarding, welfare, service delivery, risk management or emergency response.

### Therapy and Equine-Assisted Service Information

For participants engaging in therapy, educational or equine-assisted programmes, we may collect additional information relevant to the safe and effective delivery of those services, including health, welfare, assessment and support information where appropriate.

## How We Use Personal Information

We may use personal information to:

- Deliver our services, activities and programmes
- Manage participation in riding, polo, therapy and educational activities
- Communicate with individuals and their families or representatives
- Maintain health and safety standards
- Respond to emergencies and incidents
- Manage employment, volunteering and contractor relationships
- Verify identity and eligibility where required
- Manage insurance and risk requirements
- Administer bookings, events and memberships
- Comply with legal, regulatory and safeguarding obligations
- Protect the welfare of participants, staff, volunteers and horses
- Improve our services and operational effectiveness

## Photography, Filming and Media

Photographs, video recordings and other media may be captured during activities, events, training sessions, matches, programmes and day-to-day operations. The collection and use of such media is governed by our Photography, Filming & Media Notice, which is provided as part of our onboarding, registration and participation processes.

The use of photography, video and other media **does not apply to confidential therapy or support services**, unless specific informed consent has been obtained in advance.

## Sharing Information Between the Organisations

Operation Centaur Ltd, TRP Working Horses Ltd and Richmond Park Polo Club operate with shared administrative functions and resources.

Personal information may therefore be accessed and processed by authorised personnel acting on behalf of any of the three Organisations where this is necessary for administration, service delivery, operational management, safeguarding, health and safety, welfare, legal compliance or legitimate business purposes.

Access to information is restricted to individuals who require it for their role.

## Sharing Information with Third Parties

We do not sell personal information to third parties.

Information may be disclosed where necessary to:

- Emergency services and medical professionals
- Insurers and insurance representatives
- Professional advisers including solicitors, accountants and auditors
- Regulatory or law enforcement authorities
- Safeguarding agencies
- Technology and service providers supporting our operations
- Other organisations where required by law

Where possible, only the minimum information necessary will be shared.

## Medical Emergencies

Where there is a genuine concern for an individual's health, safety or welfare, relevant medical and emergency contact information may be disclosed to first aiders, paramedics, doctors, hospitals or other healthcare professionals for the purpose of providing appropriate medical care.

## Storage and Security

Personal information is stored electronically using secure business systems, including Google Workspace and Google Drive, together with other approved business tools where required.

We take reasonable technical and organisational measures to protect personal information against unauthorised access, loss, misuse, alteration or disclosure.

Access to personal information is restricted to authorised personnel and is reviewed periodically to ensure continued appropriateness.

## Data Retention

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, to provide services, to meet legal and regulatory requirements, to protect legitimate organisational interests and to resolve disputes where necessary.

Retention periods may vary depending on the type of information and the nature of the individual's relationship with the Organisations.

## Your Rights

Under UK GDPR, individuals may have the right to:

- Access their personal information
- Request correction of inaccurate information
- Request deletion of information where appropriate
- Restrict or object to certain processing activities
- Request transfer of information where applicable
- Withdraw consent where processing relies on consent
- Lodge a complaint with the Information Commissioner's Office (ICO)

Not all rights apply in every circumstance and certain legal exemptions may apply.

## Contact Us

If you have any questions about this Privacy Policy or wish to exercise your data protection rights, please contact:

Davy Hawkes
Business Support

Email: davy@operationcentaur.com

## Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our services, legal obligations or organisational practices.

The most current version will be made available through our websites, onboarding forms and other appropriate channels.