

TATTERSALLS (IRELAND) LIMITED

Data Protection Notice

We recommend that you read this Data Protection Notice carefully. Any changes to this Data Protection Notice will be posted clearly on our Website www.tattersalls.ie.

Who Controls Your Personal Data?

This Website is provided by Tattersalls (Ireland) Limited with registered number 49072 of Fairyhouse, Ratoath, County Meath (Tattersalls). “Personal Data” means any data relating to a natural person who can be identified either directly from the data itself or indirectly in conjunction with other information. Tattersalls controls your Personal Data.

Contact Us

Questions, comments and requests regarding this Data Protection Notice and the information we hold are welcome and should be addressed to Declan O’Connor, Privacy Compliance Officer, Tattersalls (Ireland) Limited, Fairyhouse, Ratoath, Co. Meath or to dataprotection@tattersalls.ie

Scope of This Data Protection Notice

Tattersalls provides certain Bloodstock Sale services to you including but is not limited to the processing of sales entries and the publication of sales related information and the sharing of information with respect to sales or sales related activities (Services). In order to manage our business and our Website and to provide our Services to you, Tattersalls collects and processes a certain amount of Personal Data as a data controller.

Tattersalls recognises that protecting Personal Data is very important to you and that you have an interest in how we collect, use, store and share such information. We always respect our customers’ privacy and Personal Data and we take this matter very seriously.

This Data Protection Notice (together with the Cookie Policy) which is available on our website, sets out the bases on which we gather, use, process and disclose any Personal Data we collect about you or that you provide to us via the Website. It also applies to any third parties whose Personal Data you provide to us in respect of which we are a data controller.

Please note: You have the right to object to the processing of your Personal Data where that processing is carried out for our legitimate interests or for direct marketing purposes.

What Personal Data Do We Collect?

We collect and process the following information:

- your name, email address and telephone number;
- information that you may voluntarily provide to us by filling in forms on our Website, which may from time to time include making an order;
- your IP address;
- information provided (as applicable) at the time of subscribing to a service we provide;
- information that you make available for publication, such as in sale catalogues and marketing materials;
- any communication or correspondence which you send to us by email or otherwise including when you request information from us or submitting comments;
- your entry or other participation in a competition or promotion;
- details of transactions you carry out through our Website, at our premises or otherwise;
- your image taken via our CCTV cameras located in our sales room and on our premises;
- details of your visits to our Website and the resources that you access;
- details of your preferences, such as your marketing preferences

How Do We Collect Your Personal Data?

You provide us with your Personal Data when you register or use our Services. We also collect information about your uses of our Website, your visits to our Website and details transactions you carry out on our Website, through the use of cookies. For more information, please see our Cookie Policy which is available on our website

Why We Process Personal Data and What Is Our Legal Basis

Reason for Processing your Personal Data	Legal Basis for Processing your Personal Data
We collect the Personal Data you provide to us as part of your registration on the Website and any further Personal Data you provide to update your registration details from time to time. We process this information in order to manage your online account efficiently.	The use is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering a contract.
To carry out obligations in relation to contracts entered into between you and Tattersalls such as the provision of bloodstock services.	The use is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering a contract.
To respond to your requests for information and other correspondences you send to us.	The processing of certain of this information is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering a contract. Other information is necessary for our legitimate business interest of ensuring our customers have all the information they need in order to engage in our products or services, attend events or deal with customer queries, provided such interests are not overridden by your interests and rights.
To record details of your purchase and sales transaction history.	The use of certain of this information is necessary for the purpose of our legitimate interests in keeping our records updated, to review issues with our products/services and to recover debts due to us, provided such interests are not overridden by your interests and rights. We are also required to retain this information for compliance with our legal and regulatory obligations in respect to Revenue audits.
To provide you with information on Sales or events or sales related updates that might interest you.	The use is necessary for the purpose of our legitimate interests in promoting our commercial offerings and to optimize the delivery of communications to that effect to audiences that are most likely to find them relevant. However, where we are legally required to obtain your consent to provide you with certain marketing materials, we will only provide you with such marketing materials where we have obtained such consent from you. Your consent can be withdrawn at any time. Please see the Direct Marketing section below for more information.
To notify you about any changes to the Website or Services	The use is necessary for the purpose of our legitimate business interests of managing our business (to keep records updated, to review issues with our products/Services and provide updates on products/Services) and to enhance your user experience provided such interests are not overridden by your interests and rights. In certain instances the processing of certain Personal Data is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering a contract.
To manage and improve the Website and to ensure that content on the Website is presented in the most effective manner for you and your computer.	The use is necessary for the purpose of our legitimate business interests of managing our business (to keep records updated, to review issues with our products/Services, to keep our Website updated and provide updates on products/Services) and to enhance your user experience provided such interests are not overridden by your interests and rights.
To provide you with customer care.	The use is necessary for the purpose of our legitimate business interests of managing our business (to keep records updated, to review issues with our products/Services and provide updates on products/Services) provided such interests are not overridden by your interests and rights. In certain circumstances the processing of Personal Data for this reason will be necessary to perform a contract entered into by you.
For security and fraud prevention purposes, which includes the use of CCTV footage	The use is necessary for the purpose of our legitimate business interests of managing our business, keeping your Personal Data safe and secure and providing a safe and secure sales environment, provided in each instance such interests are not overridden by your interests and rights. The processing of Personal Data for this purpose is also in also necessary for compliance with our legal obligations in certain circumstances.
To check that you have or are likely to have the means to pay us for any Bloodstock related Services you have processed via the Website	The use is necessary for the purpose of our legitimate business interests of managing our business (to recover debts due to us) and to enhance your user experience provided such interests are not overridden by your interests and rights.
To maintain administrative and legal records about our business to enable us to understand what we have sold, how, when, where and at what price and account to the Revenue Commissioners for the related taxes that we have to pay.	The processing is necessary to support our legitimate interests in managing our business (to keep our records updated) provided such interests are not overridden by your interests and rights. The processing of Personal Data for this purpose is also in also necessary for compliance with our legal obligations in certain circumstances.
To enable us to conduct focused market research based on trends that we identify, which we can then use to further improve our products and services for all our customers.	The processing is necessary to support our legitimate interests in managing our business (to study how customers use our services, to develop them and grow our business) provided such interests are not overridden by your interests and rights.
To enable us to understand what our customer and user base looks like across our business. We do this by combining your information with information about our other customers and users of the Website, so we can spot trends and common factors.	The processing is necessary to support our legitimate interests in managing our business (to keep our records updated and to study how Website users use our products/services) provided such interests are not overridden by your interests and rights.

Reason for Processing your Personal Data	Legal Basis for Processing your Personal Data
To analyse whether the money we spend on advertising on trade publications and trade websites, online and in search engines represents good value.	Where you have given consent to the processing of your Personal Data for direct marketing – which you may withdraw at any time. Please see the Direct Marketing section below for more information.
For the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure; or 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.	Our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
The processing of certain of this Personal Data is also necessary for compliance with our legal obligations. Obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice.	Our legitimate interests, namely the proper protection of our business against risks.

Consequences of Failure to Provide Your Personal Data

If you do not provide us with your Personal Data, we may not be able to provide the Services to you.. We will tell you when we ask for information which is a contractual requirement or needed to comply with our legal obligations.

Who Do We Disclose Personal Data To?

We may disclose your Personal Data to other companies in the Tattersalls Group including, without limitation, for the following reasons: in order to run global processes, carry out group wide reporting, or make decisions impacting our business.

It may be necessary from time to time for us to disclose your Personal Data to third parties or agents, including without limitation to the following:

- Third parties to assist in the administration, processing and management of certain activities pertaining to the Services Tattersalls provided such as providers of pedigree research, printers, post and distribution partners, marketing and promotion administrative partners, ticketing and accommodation partners, media partners with respect to the publication of sales results;;;
- Individuals or companies employed by Tattersalls to carry out specific services, functions or consultancy work IT support, auditors, banks and other financial institutions;
- Regulatory bodies to whom we are obliged or required to disclose information including but not limited to Revenue, the Property Services Regulatory Authority, the Central Statistics Office, Courts and Court-appointed persons;
- Other third parties where required to comply with any applicable law, a summons, a warrant, a court or regulatory order, or other statutory requirement.
- Our professional advisers for example lawyers or accountants when they need it to provide advice to us.
- Potential purchasers or bidders of Tattersalls;
- Purchasers or potential purchasers/bidders of horses at our sales or auctions;
- Relevant Government departments and agencies;
- Other support service providers necessary to assist Tattersalls with the above; and
- Industry Bodies.

Data Security

As you will know, the nature of the internet is such that we cannot guarantee the security of the information that you send to us. This isn't unique to Tattersalls though because no data that is sent over the internet can be guaranteed to be 100% secure. We do, however, take all reasonable steps as required by data protection law to ensure the safety, privacy and integrity of your Personal Data. We securely store your Personal Data in a centralised database, with controlled access to such database. Access to your Personal Data in both electronic and paper form is restricted to individuals who have a legitimate and justifiable reason to view such data.

How Long Do We Keep Your Personal Data?

We will keep your Personal Data for the longest of the following periods:

- As long as you are a Tattersalls customer and your Tattersalls account is active in order to maintain our on-going relationship with you, or as needed to provide you with the products, Services or information which you are entitled to or can otherwise reasonably expect to receive from us;
- For as long as necessary for the purpose for which we collected it or for which you supplied it to us in accordance with any product or Service relevant activity or process;
- Any retention period that is necessary to comply with our legal obligations (12 years in the case of Revenue audits), to resolve disputes, and enforce our agreements;
- The end of the period where retention is advisable in light of our legal position, such as in regard to applicable litigation or investigations; or,
- No longer than a period of seven (7) years after the termination of your use of our Services so as to support compulsory audit requirements imposed on us by applicable laws and regulations.

Where Is Your Personal Data Held?

Your personal data is held electronically on our secure servers which are hosted by Everything IT a third party service provider located in Ireland. Any of your Personal Data held in hard copy is stored at Everything IT, Unit 1a, Bracken Business Park, Bracken Rd, Sandyford, Dublin D18H283.

What Are Your Rights?

You have several rights in relation to your Personal Data. You have a right to:

- access a copy of your Personal Data held by Tattersalls;
- request rectification of your Personal Data if it is inaccurate or incomplete;
- request erasure of your Personal Data in certain circumstances;
- restrict our use of your Personal Data in certain circumstances;
- move (or port) Personal Data which is automated in certain circumstances;
- object to the processing of your Personal Data where our legal basis for processing your data is our legitimate interests;
- not to be subject to a decision based on automated processing, including profiling which has legal or similar significant affects;
- withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal. From that point on we would no longer be able to carry out the processing we were carrying out with your consent. We do not generally rely on consent for processing Personal Data and if we do, we will make that clear to you.
- lodge a complaint with the Office of the Data Protection Commission (if you are unhappy with how your Personal Data is being handled). Their contact details are: Canal House, Station Road, Portarlington, County Laois, Telephone: +353 (0)761 104 8000, Telephone: +353 (0)57 868 4800, LoCall Number: 1890 252 231, Email: info@dataprotection.ie

However, these rights may not be exercised in certain circumstances, such as when the processing of your Personal Data is necessary to comply with a legal obligation or for the exercise or defence of legal claims. If you wish to exercise any of your rights in this regard please contact Privacy Compliance Officer by using the details contained in the "Contact Us" which is available on our website. We will respond to your request as soon as practicable. We may request proof of identification to verify your request. We will respond to your request in writing, or orally if requested, as soon as practicable and in any event not more than one month after receipt of your request.

What About Other Websites Linked On This Website?

Our Website may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any Personal Data to those websites.

Direct Marketing

When you give us your Personal Data, we will ask you if you would like to receive information about goods, services, events and offers from us via post, telephone, email or SMS communications.

Where you have specifically consented, we will use your Personal Data to send you information by SMS or email relating to our products, services or events which may be of interest to you.

You can however opt out of receiving any direct marketing communications at any time by contacting us by phone or email (details in the "Contact Us" section) and requesting to be removed from our mailing list or click on the "unsubscribe" link in any email or SMS communications which we send you.

If you do any of these actions, we will arrange for your preferences to be updated or the information to be deleted as soon as reasonably practicable We will never sell your details to an unconnected third party for marketing purposes.