

Your personal information

This privacy policy explains how we collect and process your personal data. Personal data, or personal information, means any information about an individual from which that person can be identified. This includes information that you tell us, what we learn from you and the choices you make about the marketing you want us to send to you. This policy explains how we do this, what your rights are and how the law protects you.

Changes to data protection law

The law in relation to data protection is changing on the 25 May 2018 when the General Data Protection Regulation comes into force in the United Kingdom and across Europe.

This privacy policy tells you about most of your rights under the new law.

There may be changes which we will be required to make to this privacy policy after the 25 May 2018. Any changes to this policy will appear on this website but we will notify you every time we make a material change to this policy. We may need to ask you to agree to the changes, or refresh your consent to us using your personal information.

1. Who we are and how you can contact us

We are Hammersmith Nominees Pty Ltd T/as Saddlery Brands International (ABN 41 008 829 392), PO Box 153, Perth, WA 6858, an Australian company.

In the EU we are represented by Saddlery Brands International UK Ltd at Unit 1 Marston House, Cromwell Business Park, Banbury Road, Chipping Norton, Oxfordshire OX7 5SR and in the United States we are represented by Saddlery Brands International USA LLC at 640 Freedom Business Center Drive, Suite 120, King of Prussia, 19406.

Saddlery Brands International, Saddlery Brands International UK Ltd, Saddlery Brands International USA LLC are representatives of Wintec Saddles and Bates Saddles brands which are used around the world.

You can contact us by email at enquiries@saddlerybrandsinternational.com or by calling us on +44 1865 670 888 in the UK or +1 (215) 315-4018 in the United States. If you need to you can write to us at Saddlery Brands International at Unit 1 Marston House, Cromwell Business Park, Banbury Road, Chipping Norton, Oxfordshire OX55SR in the United Kingdom and 640 Freedom Business Center Drive, King of Prussia, 19406 in the United States

If you are in the EU, our representative for all queries in relation to this policy and your data protection rights is Ellen Bates.

When we refer to our website, we mean our websites at wintec-saddles.com, bates saddles.com, caircushionsystem.com, easychangefitsolution.com, easychange gulletssystem.com and saddlerybrandsinternational.com.

2. Where we collect your personal information from

We may collect personal information about you in the following ways:

Data you give to us:

- When you use one of our websites (including when you sign up to receive one of our newsletters or to book a test ride for one of our saddles)
- When you provide your details to us at an event we are attending (for example, at a trade show or equestrian event)
- When you register a saddle, a guarantee or a warranty with us
- In emails or letters to us
- If you take part in our competitions or promotions
- When you give us feedback
- When you become a retailer / stockist of our products and/or services

Data we collect when you use our services:

- Payment and transaction data
- Profile and usage data, including data we gather from the devices you use to connect to those services such as computers and mobile phones, using cookies (please see our separate cookies policy) and other internet tracking software

Data from third parties we work with:

- Our retailers and stockists
- Social networks (including Facebook, Twitter and Instagram)
- Agents working on our behalf
- Other customers who may provide information about you

3. Data we collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity data – name, date of birth, gender, photograph or video

Contact data – billing address, delivery address, email address or telephone numbers

Financial data – bank account and payment card details and corporate details

Transaction data – details about payments to and from you and other details of products and services you have purchased from us

Technical data - internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website

Profile data – [your username and password], purchases or orders made by you, your interests and hobbies, preferences, feedback and survey responses

Usage data – information about how you use our website, products and services

Marketing and communications data – your preferences in receiving marketing from us and our third parties and your communication preferences

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any special categories of personal data about you. This includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

4. How we use your personal information

Your privacy is protected by law.

We are only allowed to use personal information about you if we have a legal basis to do so, and we are required to tell you what that legal basis is. We have set out in the table below: the personal information which we collect from you, how we use it, and the legal ground on which we rely when we use the personal information.

In some circumstances we can use your personal information if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on our legitimate interests, we have set that out in the table below.

What we use your personal information for	What personal information we collect	Our legal grounds for processing	Our legitimate interests (if applicable)
<p>To register you as a new customer</p> <p>To enable you to register to receive our newsletter(s) or join our mailing lists</p> <p>To enable to you register a saddle and/or warranty with us</p>	<p>Identity data</p> <p>Contact data</p> <p>Marketing and communications data</p>	<p>Performance of a contract with you</p> <p>Our legitimate interests</p> <p>Our legal duty</p> <p>Your consent</p>	<p>Keeping our records up to date, working out which of our services may interest you and telling you about them</p> <p>Defining types of customers for new products and/or services</p> <p>Seeking your consent when we need it to contact you</p> <p>Being efficient about how we fulfil our legal and contractual duties</p> <p>To study how customers use our brands, products and services, to develop them, to promote and grow our business and to inform our marketing strategy</p> <p>To help understand the lifetime of our products, especially in the second-hand market</p>
<p>To process and deliver your orders</p>	<p>Identity data</p> <p>Contact data</p> <p>Transaction data</p> <p>Technical data</p>	<p>Performance of a contract with you</p> <p>Our legitimate interests</p>	<p>To provide you with a personalised service</p>
<p>To manage payments or collect and recover money owed to us</p>	<p>Identity data</p> <p>Contact data</p> <p>Transaction data</p> <p>Financial data</p> <p>Open Data and Public Records</p>	<p>Performance of a contract with you</p> <p>Our legitimate interests</p>	<p>Being efficient about how we fulfil our legal and contractual duties</p> <p>Complying with rules and guidance from regulators</p>
<p>To manage our relationship with you, including notifying you about changes to our terms or privacy notices</p>	<p>Identity</p> <p>Contact</p> <p>Transaction</p>	<p>Performance of a contract with you</p> <p>Necessary to comply with a legal obligation</p> <p>Our legitimate interests</p>	<p>To keep our records up to date and manage our business effectively and efficiently</p>
<p>To enable you to take part in a prize draw or competition, or to complete a survey</p>	<p>Identity data</p> <p>Contact data</p> <p>Transaction data</p> <p>Profile data</p>	<p>Performance of a contract with you</p> <p>Our legitimate interests</p>	<p>To study how customers and non-customers use our brands, products and services and to grow our business.</p>
<p>To administer and protect our business and our website</p>	<p>Transaction data</p> <p>Technical Usage data</p>	<p>Our legitimate interests</p>	<p>Running our business, provision of administration and IT services, network security</p>
<p>[To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you]</p>	<p>Identity data</p> <p>Contact data</p> <p>Marketing and communications data</p> <p>Usage data</p> <p>Profile data</p>	<p>Our legitimate interests</p>	<p>To study how customers and non-customers use our services, to develop them, to grow our business and to inform our brand and marketing strategy</p>

To use data analytics to improve our website, products / services, marketing, customer relationships and experiences	Usage data	Performance of a contract with you Our legitimate interests	Being efficient about how we fulfil our legal and contractual duties
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact Marketing and communications Technical Profile Usage	Our legitimate interests Consent	To develop our services and grow our brands and business, and help ensure we provide excellent service to you

5. Who we share your personal information with

We may share your personal information with any of the following organisations, for the purposes of providing the products and services which you have requested from us:

- Our group companies, including:
 - Hammersmith Nominees Pty Ltd T/as Bates Australia (ABN 41 008 829 392), PO Box 153, Perth, WA 6858 (AUSTRALIA)
 - Saddlery Brands International USA LLC (USA)
 - Saddlery Brands International UK Limited (UK)
- Our retailers and stockists (for example when you book a test ride of one of our saddles your local retailer or stockist)
- Courier and shipping/haulage companies
- Public regulators or authorities
- Companies that we have a joint venture or cooperation agreement with
- Third party organisations that provide applications/functionality, data processing or IT services to us. For example we use third parties to help provide, run and manage our internal IT systems, manage payments on our behalf, email marketing campaigns and customer analytics. These include providers of IT services, cloud-based software as services providers, data analysis, security and storage services

You can find details of how these third parties use your personal information by looking at their privacy policies, all of which should be available on the relevant websites, or on request.

We require all organisations who we share your data with to respect the security of your personal data and to treat it in accordance with the law. We do not allow any of our service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Failing to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

7. Third party links

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice or policy of every website you visit.

8. Transferring your personal information outside the EEA

The EEA is the European Economic Area, which consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal information outside the EEA we have to tell you.

If you are outside Australia, please be aware that you are sending information (including personal information) to Australia where our business is based and our servers are located. That information could then be transferred within Australia or to other countries outside your country of residence, depending on the type of information and how it is stored by us.

These countries (including Australia) may not necessarily have data protection laws as comprehensive or protective as those in your country of residence (especially if you live in the EEA); however, our collection, storage and use of your personal information will at all times continue to be governed by this policy.

9. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator (in the UK, this would be the ICO) of a breach where we are legally required to do so.

10. How long do we keep your personal information

We will keep your personal information for as long as you are our customer.

After you stop being a customer, because you have stopped regularly purchasing our products, we may keep your personal information for so long as necessary to fulfil the purposes we collected it for, including, for one of the following reasons:

- To respond to any questions or complaints from you
- To ensure our lifetime guarantee can be fulfilled
- To maintain our records
- To comply with laws applicable to us

11. Marketing

We may use your personal information to tell you about relevant products or services [and any upcoming offers].

We can only use your personal information to send you marketing messages if we have either your consent or a legitimate interest to do so.

You can ask us to stop sending you marketing messages at any time – you just need to contact us, or use the opt-out links on any marketing message sent to you.

We will get your express opt-in consent before we share your personal data with any company outside our group of companies for marketing purposes. You can ask a third party company to stop sending you marketing messages at any time, by adjusting your marketing preferences in relation to that company or by using the opt-out links on any marketing message sent to you.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of purchasing our products or services or any other transaction between you and us.

12. Your rights

You have certain rights which are set out in the law relating to your personal information. The most important rights are set out below.

Getting a copy of the information we hold

You can ask us for a copy of the personal information which we hold about you, by writing to us at enquiries@saddlerybrandsinternational.com. This is known as a data subject access request.

You will not have to pay a fee to access your personal data, unless we believe that your request is clearly unfounded, repetitive or excessive. In such circumstances we can charge a reasonable fee or refuse to comply with your request.

We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month and in that case we will notify you and keep you updated.

Telling us if information we hold is incorrect

You have the right to question any information we hold about you that you think is wrong or incomplete. Please contact us at enquiries@saddlerybrandsinternational.com if you want to do this and we will take reasonable steps to check its accuracy and, if necessary, correct it.

Telling us if you want us to stop using your personal information

You have the right to:

- object to our use of your personal information (known as the right to object); or
- ask us to delete the personal information (known as the right to erasure); or
- request the restriction of processing; or
- ask us to stop using it if there is no need for us to use it (known as the right to be forgotten).

There may be legal reasons why we need to keep or use your data, which we will tell you if you exercise one of the above rights.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Withdrawing consent

You can withdraw your consent to us using your personal information at any time. Please contact us at enquiries@saddlerybrandsinternational.com if you want to withdraw your consent. If you withdraw your consent, we may not be able to provide you with certain products or services.

Request a transfer of data

You may ask us to transfer your personal information to a third party. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

13. Making a complaint

Please let us know if you are unhappy with how we have used your personal information by contacting us at enquiries@saddlerybrandsinternational.com.

If you are in the EU, you also have a right to complain to the local data protection regulator in your country of residence (in the UK, this is the Information Commissioner's Office whose contact details you can find at www.ico.org.uk). We would be grateful for the chance to deal with your concerns before you approach the relevant EU regulator so please contact us in the first instance.