

# Privacy

## HOW WE USE YOUR DATA

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# Our Principles

AVANSCE is all about developing your riding performance and improving your communication with your horse. We help you achieve more from your riding. So that we can help you, sometimes we'll need to know some things about you. While we collect and use your data, we fully understand that you value your privacy.

We believe privacy is about freedom and being able to decide for yourself how your data is used and by whom. This is why we have established our Privacy Principles:

- 1. We will always keep you fully informed about your data**

We make sure you understand which data from or about you we use, why we use it, how long we use it and who can use it.

- 2. We enable you to remain in control of your data**

We consider the data from or about you to be yours. We only use it for the purposes for which you have given it to us, or for which we collected it from you. At any time you can opt-out or opt-in using our software and websites.

- 3. We protect your data**

Your data is yours. We keep it that way by protecting it as best as we reasonably can to prevent it from falling into the wrong hands.

# Our ten promises to you

1. We will tell you which data from or about you we use, why we use it, how long we use it, who else can use it and where it is kept.
2. We will only use your data for the purposes we have explained to you.
3. We keep as little of your data as possible and only for as long as we need it. When we no longer need data we destroy it or we irreversibly anonymise it, so it is no longer linked to you.
4. If we ask your permission to use your data for specific purposes, we also allow you to withdraw your permission.
5. If we have not been able to ask your permission to collect and use your data and you don't want us to do so, you can tell us and we will act accordingly.
6. We will allow you to access and correct your data if it is linked to your Synchronicity® account.
7. We will keep protecting your data against unauthorized access and accidental loss as best as we reasonably can.
8. If we engage others to use your information on our behalf, we will ensure they act in accordance with our policies.
9. If we share your data with others, we will first ask you for permission, unless there is a legal obligation that prohibits us from asking.
10. We are open to any questions you may have about how we use your data and we will answer them.

# AVANSCE policy on privacy and processing of personal data

We operate according to the privacy laws applicable in your country. Because we are rooted in the UK, UK laws also apply. These laws are considered to be the most extensive in the world. They offer a high level of protection to you by only allowing us to use your data according to the strict conditions of these laws. Our company policy on privacy and processing of personal data reflects these laws and we apply this policy globally.

## Definitions

**Personal Data:** any information relating to an identified or identifiable natural person ('Data subject', user); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity;

**Processing of Personal Data 'processing':** any operation or set of operations which is performed upon Personal Data, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

1. AVANSCE will process Personal Data fairly and lawfully.
2. AVANSCE will collect Personal Data for specified, explicit and legitimate purposes and will not further process Personal Data in a way incompatible with those purposes.
3. AVANSCE will ensure Personal Data is adequate, relevant and not excessive in relation to the purposes for which they are collected and/or further processed.
4. AVANSCE will ensure Personal Data are accurate and, where necessary, kept up to date.

5. AVANSCE will keep Personal Data in a form which permits identification of its users for no longer than is necessary for the purposes for which the Personal Data were collected or for which they are further processed.
6. AVANSCE will process Personal Data only if:
  - a) the user has unambiguously given his consent; or
  - b) processing is necessary for the performance of a contract to which the user is party or in order to take steps at the request of the user prior to entering into a contract; or
  - c) processing is necessary for compliance with a legal obligation to which AVANSCE is subject; or
  - d) processing is necessary for the purposes of the legitimate interests pursued by AVANSCE, except where such interests are overridden by the interests for fundamental rights and freedoms of the user and in particular his right to privacy.
7. AVANSCE will avoid processing Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, or Personal Data concerning health or sex life.
8. AVANSCE will avoid processing Personal Data related to persons under the age of 13 years.
9. To ensure fair processing of Personal Data, AVANSCE will inform its users of
  - a) The purposes of the processing;
  - b) The categories of the Personal Data concerned;
  - c) The categories of the recipients of the Personal Data;
  - d) How to access and rectify their Personal Data.
10. AVANSCE implements appropriate technical and organizational measures to protect Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, in particular where the processing involves the transmission of Personal Data over a network, and against all other unlawful forms of processing. AVANSCE does so having regard to the state of the art and the cost of their implementation, ensuring a level of security appropriate to the risks represented by the processing and the nature of the Personal Data to be protected.

11. In case processing is carried out on AVANSCE's behalf, AVANSCE will choose a processor providing sufficient guarantees in respect of the technical security measures and organizational measures governing the processing to be carried out, and will ensure compliance with those measure. In these cases AVANSCE will ensure the processing is governed by a contract binding the processor to the controller and stipulating in particular that:
  - a) The processor shall act only on instructions from AVANSCE;
  - b) The provisions of (10) are applied to the processor.
12. In principle AVANSCE will process Personal Data in the UK. In those cases where Personal Data is transferred or processed outside the UK by AVANSCE or on AVANSCE's behalf, AVANSCE will ensure adequate safeguards with respect to the protection of the privacy and fundamental rights and freedoms of individuals and as regards the exercise of the corresponding rights by applying appropriate contractual clauses or other acceptable legally binding instruments.
13. In case AVANSCE remotely stores information, or gains access to (any) data already stored, in a device of a user, AVANSCE will ensure the user concerned has given his or her consent, having been provided with clear and comprehensive information, about the purposes of the processing. This shall not prevent AVANSCE from any technical storage or access for the sole purpose of carrying out the transmission of a communication over an electronic communications network, or as strictly necessary in order for AVANSCE to provide a service explicitly requested by the user.

# Data we collect

When you use our sites, our products and our services, we collect data from you or about you. What data we collect depends on what you use and how you use it. In general there are 3 categories of data we collect and use:

## Data you provide

This is the data you enter yourself when using our sites, products and services. This data includes, for example, your username, family (given) name, email address, the search terms you enter, your address and favourite locations, your phone number, your horse's name, gender, age and free text comments etc.

## Data collected via sensors

Many of our products come equipped with one or more sensors or use the sensors of the devices they run on. Examples of sensors are GPS receivers, WiFi or Bluetooth transceivers, a camera, a microphone, accelerometers, gyroscopes, force sensors and touch sensitive screens. These sensors, when activated, will automatically collect data. Depending on the purpose for which it was captured, the data in combination with data that identifies you or your device can be sent to AVANSCE and others for subsequent use.

## Metadata

This refers to any data that is collected or automatically generated while you use AVANSCE sites, products or services. In many cases metadata is collected or generated inherent to you using a computing device or inherent to transmitting data over computer networks, such as the internet. This data includes user interface and other device usage events, IP-addresses, unique device identifiers, WiFi and Bluetooth MAC addresses, cookies and records of computer activity.

## Data we receive from others

We receive data from third parties that they have collected, under their responsibility and in accordance with their privacy policy, and shared with us. We use that data within the limits of what these third parties allow us to do with it while also adhering to our own privacy principles and policy. We receive reports of bugs and app malfunctions and reports of interaction with our apps such as frequency of use. We use this data only after we have made sure it cannot be linked back to you.

We also receive data from others about you when you have interacted with them, for example when you have visited their websites or used their mobile apps. This data can include IP-addresses, unique device identifiers, advertising identifiers, Wi-Fi and Bluetooth MAC addresses, cookies and other records of computer activity, as well as indications of your behaviour, interests and demographic.



# Your Synchronicity® account

AVANSCE uses your Synchronicity® account to grant you access to downloadable content, services you are subscribed to or have activated, software upgrades and sections of our website which need registration. We also use your Synchronicity® account when you want to purchase additional items and to tailor our offerings to you. The way in which AVANSCE uses your Synchronicity® account also depends on the software and device or system you use.

To create your Synchronicity® account, as a minimum you need to supply your name and email address and choose a password. AVANSCE advises you to keep your Synchronicity® account details confidential and use a password you do not use elsewhere.

We will use your email address occasionally to send information related to the products and services registered to your Synchronicity® account. We will only do this if there are updates you need to be aware of to ensure you can use your product in a safe, reliable way, without interruption or if there is a legal requirement to contact you. We may use SMS or in-app notifications to send information to you. You can opt-out of any or all of these methods of communication if you so wish.

Using your Synchronicity® account, you can also subscribe to the AVANSCE News email, which provides the latest news, product information and special offers from AVANSCE and others we select. You can opt-out of receiving the AVANSCE News email at any time by clicking on the appropriate link in the emails you receive.

Should you wish to delete your Synchronicity® account, please visit

<http://www.AVANSCE.com/support>.

We will not share your Synchronicity® account details with anyone else, unless they work under our responsibility, according to our instructions or when explicitly and lawfully ordered to do so following due legal process.