

HORSE RACING IRELAND

PRIVACY & COOKIES POLICY

(last revised on 13 December 2023)

1. WHO WE ARE

We are Horse Racing Ireland, a body corporate established pursuant to the Horse and Greyhound Racing Act 2001, (hereinafter referred to as **HRI, we, us** or **our**, and which terms shall also include our Affiliates. **Affiliates** means any entity that directly or indirectly controls, is controlled by, or is under common control with us. **Control** means direct or indirect ownership or control of more than 50% of the voting interests of the subject entity (please see section 8 below for details of our Affiliates)). We are the national authority for thoroughbred racing, with responsibility for the governance, development and promotion of the industry (the **Business**).

Your privacy is of paramount importance to us. This privacy and cookies policy (the **Policy**) applies to the Business and the hri-ras.ie website (the **Websites**), applications and services related thereto (the **Service**). This Policy is designed to protect you, our users, by informing you what Personal Data is collected, how we will use Your Personal Data, with whom we share it, how long we keep it and how to contact us if you have any queries or concerns about our use of Your Personal Data. Your use of the Website is subject to your agreement with this Policy.

HRI Business	Company Name	Website
Funded by HRI	Equip	https://equip.ie
Funded by HRI	ITM	https://www.itm.ie/
Funded by HRI	Ownership	https://www.racehorseownership.ie/
HRI	HRI Corporate	https://www.hri.ie
HRI	HRI Goracing	https://www.hri.ie
HRI	HRI RAS Admin	https://admin.hri-ras.ie/
HRI	HRI RAS Industry	https://www.hri-ras.ie/
HRI Events	Irish Champions Weekend	https://www.irishchampionsweekend.ie
HRI Racecourse	Fairyhouse	https://www.fairyhouse.ie/
HRI Racecourse	Leopardstown	https://www.leopardstown.com
HRI Racecourse	Leopardstown Golf	https://www.leopardstowngolfcentre.com/
HRI Racecourse	Navan	https://www.navanracecourse.ie
HRI Racecourse	Tipperary	https://www.tippearyraces.ie

In this Policy, the term **Personal Data** means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, our possession, and includes Personal Data as described in Data Protection Laws (as defined below).

Please read the following carefully. Registering for an account (**Your Account**) on our Website(s) or any mobile application, use of Your Account or our Website(s) or otherwise accepting the terms of this Policy indicates that you have reviewed this Policy and have agreed to be bound by it. If you do not agree to these terms you must leave our Website(s) immediately. If you no longer consent to our processing of Your Personal Data, you may request that we cease such processing by contacting us. See 'How to Contact Us' below.

We will handle Your Personal Data in accordance with Data Protection Laws. **Data Protection Laws** means the Data Protection Acts 1988 to 2018, the General Data Protection Regulation (EU) 2016/679 (**GDPR**), and any other applicable law or regulation relating to the processing of Personal Data and to privacy, including the E-Privacy Directive 2002/58/EC and the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011, as such legislation shall be supplemented, amended, revised or replaced from time to time and all guidance and codes of practice issued by a relevant supervisory authority, from time to time and which are applicable to us.

We are a controller (as defined in Data Protection Laws) in relation to any Personal Data which we collect from you through your or any other user's use of the Service and the set-up of Your Account. This Policy sets out the basis on which any such Personal Data will be processed by us.

You may be a data subject (as defined in Data Protection Laws) or you may be a controller. When you are a controller in respect of the Personal Data of other data subjects, then you must comply with all of your controller obligations under Data Protection Laws. When you are a controller, we and you act as independent controllers, unless agreed otherwise.

2. **INFORMATION WE GATHER FROM YOU**

We fully respect your right to privacy in relation to your interactions with the Service and endeavour to be transparent in our dealings with you as to what Personal Data we will collect and how we will use Your Personal Data. We only collect and use Personal Data where we are legally entitled to do so. Information in relation to Personal Data collected by Irish entities is available on www.dataprotection.ie, the Website(s) of the Irish Data Protection Commission (**DPC**).

We may collect Personal Data from you in the course of your use of the Service. The information that we process includes the following:

Basic Information	such as your first and last name (including prefix or title), gender, age range, date of birth, national identity documentation such as passports and work visas;
Contact Information	such as your billing, home and/or business postal address, email address and phone number(s);

WhatsApp Profile Contact Information	WhatsApp profile username, profile picture and contact number;
Profile Information	including your username and password, client or customer number, your purchase of tickets or hospitality (when you enter into a competition/promotion or avail of our services or supports, including betting services), your organisation, your areas of interest, information relating to your registration to access any of our restricted content, feedback and survey responses;
Financial Information	including your VAT number, bank account or card details and bank account details for payment processing purposes;
Newsletter Information	which is information provided by you when you opt-in to receive our newsletter;
Marketing Information	your interests and preferences in receiving newsletter, WhatsApp marketing communications or other marketing communications from us and third parties and your communication preferences (i.e. email, WhatsApp or SMS).
Technical Information	such as information from your visits to our Website(s) or applications (including internet protocol (IP) address and login data, browser or client application information, language preference, operating system and application version, device type and ID, and device model and manufacturer, and other technology on the devices you use to access the Website(s) or applications) or in relation to materials and communications we send to you electronically;
Location Data	relating to you (including real-time geographic location of your computer or device through GPD, Bluetooth and your IP address, along with Wi-Fi hotspot and cell tower locations, if you use location-based features and turn on the location service settings on your device and computer);
Communication Data	communications you exchange with us or direct to us via letters, emails, chat service, calls and social media and telephone conversations from/with you;
Employment Data	employment applications including your personal information, education and training information, your photograph;
Sensitive Personal Data	some personal details about your physical and mental health and information relating to alleged commission or conviction of criminal offences;
Equine-related Information	information about the horse(s) you own or are interested in for racing or breeding purposes and race card information;
CCTV footage Data	CCTV footage when you visit our premises; Please see CCTV policy;

Call Recordings	Phone calls may be recorded. If this is the case it will be announced prior to commencing the recording;
Images and Photographs	using photographs or film footage that have been taken of you by our photographers or third party photographers attending or participating in ticketed and non-ticketed horseracing events for promotional and marketing purposes and to broadcast our racing events to a wider audience on television and online;
Cookie Data	data collected from your interaction with the Websites, including this Website, through cookies and similar identifier technologies (such as pixels and social plugins) which collect user data, such as clicks, language and login preferences, device specifications, location and search history. Please see section 5 below for further information on cookies and other identifiers and how we use them;
Personal Data of individuals under the age of 18 (“minors”)	Name, address, email address, phone number, signature, date of birth, bank details and name and contact details of parent or guardian; and
Any Other Information	Any other information relating to you which you may provide to us.

Any Personal Data that we collect from you for the above purposes is referred to in this Policy as **Your Personal Data**. Your Personal Data is separate from and should be distinguished from User Uploaded Data (as defined below).

We endeavour to keep Your Personal Data accurate and up-to-date. As such, you must tell us about any changes to such information that you are aware of as soon as possible.

Please note that we do not process personal data relating to minors, except where a minor registers as a jockey with HRI.

The legal basis or bases on which we may process the personal data of minors is set out below. Where we rely on the consent of minors as the legal basis for processing their personal data, HRI shall ensure that the minor is of sufficient age and maturity to provide such consent.

3. **WHY WE COLLECT/HAVE ACCESS TO YOUR INFORMATION**

We may collect information from you as necessary in the course of providing our Service. We may collect your Personal Data while monitoring our technology tools and services, including our Website(s) and email communications sent to and from us. We gather information about you when you provide it to us, or interact with us directly.

We may use Your Personal Data on any one or more of the following legal bases: (i) to perform a contract with you; (ii) for our legitimate business purposes in providing the Service to you (in which case, our legitimate interests will not override your fundamental privacy rights); and/or (iii) in limited circumstances, where you have given us your express consent. We may also use or disclose your Personal Data to comply with a legal obligation to which we are subject.

We have set out below, in a table format, a description of all the ways we plan to use Your Personal Data, and which of the legal bases we rely on to do so on a non-exhaustive basis and as may be updated from time to time. We have also identified what our legitimate interests are, where appropriate.

Note that we may process Your Personal Data for more than one legal basis, depending on the specific purpose(s) for which we are using Your Personal Data. Please contact us if you need details about the specific legal basis we are relying on to process Your Personal Data where more than one ground has been set out in the table below. See 'How to Contact Us' below.

Where we process any special category data, such as health data, we will ensure that we have a legal basis for processing, that a data protection impact assessment is carried out, where required and that additional safeguards are put in place to protect the data, where required.

Purpose	Categories of data	Legal basis for processing and, where necessary, the basis of legitimate interest
To respond to an enquiry from you/provide customer support.	basic information, and contact information.	Necessary to take steps at your request prior to entering into a contract with you.
To register you as a customer of our Website(s).	basic information, contact information, profile information, equine-related information, and financial information.	Performance of a contract with you. Necessary for our legitimate interests in protecting our business from insolvent customers and fraud.
To make suggestions and recommendations to you about goods or services that may be of interest to you/personalise the products and services we offer you (including ascertaining the platform or mobile devices which you use). We may contact you with information regarding promotions and ancillary services through our	basic information, contact information, WhatsApp profile contact information, profile information, cookie data, marketing information, and newsletter information.	Necessary for our legitimate interests (to develop our products/services and grow our business). Consent for direct marketing purposes.

Purpose	Categories of data	Legal basis for processing and, where necessary, the basis of legitimate interest
newsletter, via WhatsApp or via other e-communications (SMS/email) and post.		
To administer and protect our business and improve our Website(s) and Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	basic information, contact information, profile information, cookie data, newsletter information, and technical information	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).
To provide and improve our Website(s), including auditing and monitoring its use, providing and improving our Service to you and managing and administering our relationship with you.	basic information, contact information, marketing information, technical information, cookie data, communication data, and location data.	Necessary for our legitimate interests to provide and improve our Website(s), including auditing and monitoring its use; providing and improving our Service to you; or managing and administering our relationship with you; Necessary to fulfil our legal, regulatory and risk management obligations.
To recruit new employees (where we have advertised a position and you have applied for it) and to conduct interviews and carry out an assessment of your suitability for the role. The profile photograph also enables our staff to identify	basic information, contact information, employment information, and sensitive personal data.	Necessary for our legitimate interest (to develop our business and employ staff where required). Consent (for sensitive personal data).

Purpose	Categories of data	Legal basis for processing and, where necessary, the basis of legitimate interest
you internally, where you are employed by us.		
To protect our business premises against criminal damage.	CCTV footage data.	Necessary for our legitimate interests (protecting our business premises against criminal damage).
To enable you to participate in racing activities.	equine-related information.	Performance of a contract with you.
To enable us to provide our Loyalty Programme (e.g. allocating points to you), in collaboration with Rewards4Racing Ltd, should you register for an account with Rewards4Racing.	basic information, contact information, profile information, financial information, marketing information, newsletter information, equine-related information, and technical information	Consent (to participating in the Loyalty Programme). Necessary for our legitimate interests (to develop our products/services and grow our business).
To enable us to promote and market various horseracing events using images of you attending and/or participating in ticketed and non-ticketed horseracing events and to broadcast our racing events to a wider audience.	Photographs and Images.	Necessary for the performance of a task carried out in the public interest.
To register minors as jockeys.	Personal Data of individuals under the age of 18.	Consent of minors with sufficient age and maturity to provide same.

Purpose	Categories of data	Legal basis for processing and, where necessary, the basis of legitimate interest
		Necessary for the performance of a task carried out in the Public Interest.

4. USER UPLOADED DATA

Your Personal Data is separate from and should be distinguished from User Uploaded Data. **User Uploaded Data** is data uploaded by you or others through Your Account or by your use of the Service on our Website(s). We strongly recommend that you avoid uploading any Personal Data in any User Uploaded Data. We reserve the sole right to review, edit or delete User Uploaded Data. We also moderate all User Uploaded Data in order to ensure that it does not contain Personal Data. Notwithstanding this, we are a Processor (as defined in the GDPR) and you are a Controller in respect of User Uploaded Data (to the extent that it includes Personal Data). If we are deemed for any reason to be a Controller of any User Uploaded Data (to the extent that it includes Personal Data) then we will comply with all of our Controller obligations under Data Protection Laws.

If you are a Controller in respect of any Personal Data of other data subjects contained in User Uploaded Data, then you must comply with all of your Controller obligations under Data Protection Laws in that regard.

5. COOKIES POLICY

A cookie is a small text file that is placed on your device by a web server, which we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. Our Website(s) uses cookies to distinguish you from other users of our Website(s). This helps us to provide you with a better experience when you browse our Website(s) and also allows us to improve the Website(s). Cookies also help us to improve our Service and to deliver many of the functions that make your browser experience more user-friendly. Those cookies are set by us and called first-party cookies.

We also use third-party cookies – which are cookies from a domain different than the domain of the website you are visiting – for our advertising and marketing efforts. More specifically, we use cookies and other tracking technologies for the purposes set out in the tables below.

We use the following types of cookies:

Strictly necessary (essential) cookies	These cookies are required for the operation of our Website(s). They include, for example, cookies that enable you to log into secure areas of our Website(s), use a shopping cart or make use of e-billing services.
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<p>Analytical or performance cookies</p>	<p>These cookies allow us to recognise and count the number of visitors and to see how visitors move around our Website(s) when they are using it. This helps us to improve the way our Website(s) works, for example, by ensuring that users are finding what they are looking for easily and to see how effective and relevant advertising on our Website(s) is.</p> <p>For example, we use Google Analytics tracking cookies to understand if you complete certain actions on our Website(s) after you have seen or clicked through one of our adverts served via Google. Google Analytics uses a set of cookies to collect information and report site usage statistics without personally identifying individual visitors to Google. For more information, visit: https://policies.google.com/technologies/cookies?hl=en-US#how-google-uses-cookies.</p>
<p>Functionality cookies</p>	<p>These are used to recognise you when you return to our Website(s). This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or location) and remember if we have already asked you for feedback or to complete a survey.</p> <p>For example, we use embedded YouTube videos on our Website(s). These have 'Enable privacy-enhanced mode' checked when the embed code is extracted from YouTube. For more information, visit: https://support.google.com/youtube/answer/171780?hl=en.</p>
<p>Targeting cookies</p>	<p>These cookies record your visit to our Website(s), the pages you have visited and the links you have followed. We will use this information to make our Website(s) and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.</p> <p>For example, we use Google tracking cookies to understand if you complete certain actions on our Website(s) after you have seen or clicked through one of our adverts served via Google. Based on the content you have engaged with on our Website(s), Google delivers some targeted advertisements across other Google partner Website(s). For more information, visit: https://support.google.com/ads/answer/2662922?hl=en.</p> <p>Our Website(s) may from time to time use Facebook Advertising, Facebook Pixel Re-Marketing, and communications. This tool allows us to understand and deliver ads and make them more relevant to you. The collected data remains anonymous and we cannot see the personal data of any individual user.</p> <p>However, the collected data is saved and processed by Facebook. Facebook may be able to connect the data with your Facebook account and use the data for their own advertising purposes. Facebook has ultimate control of the information</p>

	gathered through Facebook Advertising, Facebook Pixel Re-Marketing, and communications. You can opt-out of Facebook's use of cookies and Facebook Pixel Re-Marketing through settings on your Facebook Account.
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5.1 First Party Cookies

You can find a list of first party cookies we use and the purposes for which we use them in the table below.

Strictly Necessary (Essential) Cookies	Website(s)	Purpose	Duration
*-Dismissed	Leopardstown, Fairyhouse, Navan, Equuip	(HRI) To keep track of the user selection for dismissing the newsletter popup	7 days
__cf_logged_in	All	(Cloudflare) Cloudflare security firewall	1 year
__RequestVerificationToken	ITM	(HRI) This is an anti-forgery cookie set by web applications built using ASP.NET MVC technologies. It is designed to stop unauthorised posting of content to a website, known as Cross-Site Request Forgery. It holds no information about the user and is destroyed on closing the browser.	session
All Cookies Accepted	All	(HRI) Cookie used to distinguish that cookies are allowed on the site	6 months
ASP.NET_SessionId	HRI sites, Leopardstown Golf, ITM, RAS Admin	(HRI) General purpose platform session cookie, used by sites written with Microsoft.NET based technologies. Usually used to maintain an anonymised user session by the server.	session
AspNetCore.Antiforgery	Equuip	(HRI) This is a general-purpose platform session cookie, used by sites written with Microsoft.NET based technologies. It is usually used to maintain an anonymised user session by the server.	session
ClientLogin	RÁS Admin	(HRI) Required to store data required for user login to website	1 year
CMSCookieLevel	Equuip, ITM, Ownership, HRI Corporate, HRI Goracing, HRI RAS Industry, Irish Champions Weekend, Fairyhouse, Leopardstown, Leopardstown Golf, Navan, Tipperary	(HRI) This cookie is used to determine the level of functionality the Kentico CMS can provide based on the users choice of cookie level	1 year
FGTServer	ITM, Ownership, HRI Corporate, HRI Goracing, HRI RAS Industry, Irish Champions Weekend,	(HRI) The value of the cookie encodes the server that traffic should be directed to in a web server load-balanced environment.	1 Hour

Strictly Necessary (Essential) Cookies	Website(s)	Purpose	Duration
	Fairyhouse, Leopardstown, Leopardstown Golf, Navan, Tipperary		
HRI Accepted	RÁS Admin	(HRI) Used to determine if cookie has been accepted	1 year
sparrow_id	All	(Cloudflare) Cloudflare security firewall	1 year

Analytical Cookies	Website(s)	Purpose	Duration
__cf_bm	HRI Sites, Equip, ITM	(Cloudflare) This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	30 minutes
_ga	All	(Google) This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session, and campaign data for the site's analytics reports.	2 years
_gat	All	(Google) This cookie is part of Google Analytics and is used to limit requests (throttle request rate).	1 minute
_gat_gtag_UA_*	All	(Google) This cookie is part of Google Analytics and is used to limit requests (throttle request rate).	1 minute
_gid	All	(Google) This cookie is set by Google Analytics. It stores and update a unique value for each page visited and is used to count and track pageviews.	1 day

Functional Cookies	Website(s)	Purpose	Duration
__cfllb	ITM, Ownership, HRI Corporate, HRI Goracing, HRI RAS Industry, Irish Champions Weekend, Fairyhouse, Leopardstown, Leopardstown Golf, Navan, Tipperary	(Cloudflare) This cookie is used by Cloudflare for load balancing.	23 hours

There are no first party targeting cookies on our websites.

5.2 Third Party Cookies

Please note that a number of third parties may also use cookies. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third party cookies help us to improve our Service and to deliver many of the functions that make your browser experience more user-friendly.

You can find a list of third party cookies we use and the purposes for which we use them in the table below.

Strictly Necessary (Essential) Cookies	Website(s)	Purpose	Duration
AWSELBCORS	Leopardstown, Fairyhouse, Navan, LeopardstownGolfCenter, Tipperary	(Future Ticketing) The cookies AWSELB and AWSELBCORS are functionally the same cookies. The latter has an explicit SameSite attribute set because of changes made from Chrome 80 and upwards.	15 minutes
ft*	Leopardstown, Navan, Fairyhouse, Tipperary, ICW	(Future Ticketing) This cookie is used by future ticketing for purchasing tickets	2 years
PHPSESSID	Leopardstown, Navan, Fairyhouse, Tipperary, ICW	(Future Ticketing) Cookie generated by applications based on the PHP language. This is a general-purpose identifier used to maintain user session variables. It is normally a random generated number, how it is used can be specific to the site, but a good example is maintaining a logged-in status for a user between pages.	15 minutes

Analytical Cookies	Website(s)	Purpose	Duration
APISID	HRI Event sites	(Google) collects visitor information for videos played out by YouTube.	Persistent

Functional Cookies	Website(s)	Purpose	Duration
__stripe_mid	Leopardstown, Navan	(Future Ticketing) This cookie is associated with Calendly, a Meeting Schedulers that some websites employ. This cookie allows the meeting scheduler to function within the website. https://leopardstown.com/October_Race_Meetings_At_Leopardstown/	30 minutes
__stripe_sid	Leopardstown, Navan	(Future Ticketing) This cookie is associated with Calendly, a Meeting Schedulers that some websites employ. This cookie allows the meeting scheduler to function within the website. https://leopardstown.com/October_Race_Meetings_At_Leopardstown/	1 year
VISITOR_INFO01_LIVE	Fairyhouse	(Google) This cookie is set by YouTube to keep track of user preferences for YouTube videos embedded in sites. It can also determine whether the website visitor is using the new or old version of the YouTube interface.	6 months

Functional Cookies	Website(s)	Purpose	Duration
YSC	HRI Sites, HRI Racecourse sites, Funded by HRI Sites	(Google) This cookie is set by YouTube to track views of embedded videos.	Session
test_cookie	HRI Sites, HRI Racecourse sites, Funded by HRI Sites	(Google) This cookie is set by DoubleClick (which is owned by Google) to determine if the website visitor's browser supports cookies.	15 minutes

Targeting Cookies	Website(s)	Purpose	Duration
__Secure-1PAPISID	HRI Event Sites	(Google) Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	2 years
__Secure-1PSID	HRI Event Sites	(Google) Used to profile the interests of website visitors and display relevant and personalised Google ads.	2 years
__Secure-1PSIDCC	HRI Event Sites	(Google) Used by for targeting purposes to build a profile of the website visitor's interests in order to show relevant & personalised Google advertising	2 years
__Secure-3PAPISID	HRI Event Sites	(Google) Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	2 years
__Secure-3PSID	HRI Event Sites	(Google) Used to profile the interests of website visitors and display relevant and personalised Google ads.	2 years
__Secure-3PSIDCC	HRI Event Sites	(Google) Used for targeting to profile the interests of website visitors and display relevant and personalised Google Ads	2 years
_fbp	GoRacing, Leopardstown, Fairyhouse, Ownership, HRI Event Sites	(Meta) The '_fbp' cookie identifies browsers for the purposes of providing advertising and site analytics services and has a lifespan of 90 days	3 months
_gcl_au	HRI Sites, HRI Racecourse sites, Funded by HRI Sites, Tote, Hub	(Google) Used by Google AdSense for experimenting with advertisement efficiency across websites using their services	3 months
1P_JAR	HRI Event Sites	(Google) Based on recent searches and previous interactions, custom ads are placed on Google websites.	1 week
AES	HRI Event Sites	(Google) ensure that requests within a browsing session are made by the user, and not by other sites	2 years
AnalyticsSyncHistory	Ownership	(LinkedIn) Used to store information about the time a sync took place with the lms_analytics cookie	1 Month
bcookie	Ownership	(LinkedIn) Used for remembering that a logged in user is verified by two factor authentication.	1 year
HSID	HRI Event Sites	(Google) Contain digitally signed and encrypted records of a user's Google Account ID and most recent sign-in time	2 years

Targeting Cookies	Website(s)	Purpose	Duration
IDE	GoRacing, HRI Event Sites	(Google) This cookie is set by Doubleclick and carries out information about how the end user uses the website and any advertising that the end user may have seen before visiting the said website.	1 year
lang	Ownership	(LinkedIn) Used to store consent of guests regarding the use of cookies for non-essential purposes	session
li_gc	Ownership	(LinkedIn) Used to store consent of guests regarding the use of cookies for non-essential purposes	1 Month
lidc	Ownership	(LinkedIn) To facilitate data centre selection	1 day
Li_sugar	Ownership	(LinkedIn) sets this cookie to collect user behaviour data to optimise the website and make advertisements on the website more relevant	2 months
Ln_or	Ownership	(LinkedIn) This cookie registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	1 day
NID	HRI Event Sites	(Google) Stores visitor preferences and personalises ads on Google sites based on recent searches and interactions.	6 months
SEARCH_SAMESITE	HRI Event Sites	(Google) Used to prevent the browser from sending the cookie along with cross-site requests.	2 years
SID	HRI Event Sites	(Google) Google Analytics customisation cookie. Used by the Google + 1 sharing button and is required to link content to your Google 1+ account.	2 years
SIDCC	HRI Event Sites	(Google) Security cookie to confirm visitor authenticity, prevent fraudulent use of credentials, and protect visitor data from unauthorised access.	3 months
UserMatchHistory	Ownership	(LinkedIn) LinkedIn Ads ID syncing	1 Month

5.3 How to manage or turn off Cookies

The 'Help Menu' on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. You can also disable or delete similar data used by browser add-ons, such as flash cookies, by changing the add-ons settings or visiting the website of its manufacturer.

Further information about cookies and how to disable them can be found at www.allaboutcookies.org or ico.org.uk/your-data-matters/online/cookies. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to fully experience the interactive features of our Service/Website or other related websites/applications which you visit/use.

6. CASES WHERE WE MAY USE YOUR INFORMATION TO CONTACT YOU

We may contact you (i) for administration reasons related to the Service (e.g. to provide you with password reminders or to notify you that a particular service, activity or online content has been suspended for maintenance, or in response to a question that you ask us); (ii) to provide you with information about our Service, activities or online content, including sending e-newsletters or similar correspondence and updates or responding to any contact you have made with us, e.g. on our Website(s), by email or via the 'How To Contact Us' below; (iii) to invite you to participate in surveys about our services (participation is always voluntary); and (iv) for direct marketing purposes.

7. YOUR RIGHTS

As a data subject, you have the following rights under Data Protection Laws and we, as controller in respect of Your Personal Data, will comply with such rights in respect of Your Personal Data. These rights are explained in more detail below, but if you have any comments, concerns or complaints about our use of Your Personal Data, please contact us (see 'How to Contact Us' below). We will respond to any rights that you exercise within one month of receiving your request, unless the request is particularly complex, in which case we will respond within three months (we will inform you within the first month if it will take longer than one month for us to respond).

Right	Further Information
Right of Access (Article 15 GDPR)	<p>You have the right to request a copy of Your Personal Data. Requests for Your Personal Data must be made to us (see 'How to Contact Us' below) specifying what Personal Data you need access to, and a copy of such request may be kept by us for our legitimate purposes in managing the Service. To help us find the information easily, please give us as much information as possible about the type of information you would like to see. If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person, if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person, if possible.</p> <p>We are also entitled to refuse a data access request from you where (i) such request is manifestly unfounded or excessive, in particular because of its repetitive character (in this case, if we decide to provide you with the Personal Data requested, we may charge you a reasonable fee to account for administrative costs of doing so); or (ii) we are entitled to do so pursuant to Data Protection Laws.</p> <p>For security reasons, we will take reasonable steps to confirm your identity before providing you with any Personal Data we may hold about you.</p>

Right	Further Information
Right of Rectification (Article 16 GDPR)	<p>You have the right to request that we amend any inaccurate or incomplete Personal Data that we have about you. If you would like to do this, please (i) email or write to us (see ‘How to Contact Us’ below); (ii) let us have enough information to identify you (e.g. name, registration details); and (iii) let us know the information that is incorrect and what it should be replaced with.</p> <p>If we are required to update Your Personal Data, we will inform recipients to whom that Personal Data have been disclosed (if any), unless this proves impossible or has a disproportionate effort.</p> <p>It is your responsibility that all of the Personal Data provided to us is accurate and complete. If any information you have given us changes, please let us know as soon as possible (see ‘How to Contact Us’ below).</p>
Right to Object (Article 21 GDPR)	<p>You have the right to ask us to stop using Your Personal Data, and we will comply unless there is a legal basis for us to continue using it, which we will explain to you.</p>
Right to Erasure (Article 17 GDPR)	<p>You can ask us to erase Your Personal Data (i) where we do not need Your Personal Data in order to process it for the purposes set out in this Policy; (ii) if you had given us consent to process Your Personal Data, you withdraw that consent and we cannot otherwise legally process Your Personal Data; (iii) you object to our processing and we do not have any legal basis for continuing to process Your Personal Data; (iv) Your Personal Data has been processed unlawfully or have not been erased when it should have been; or (v) the Personal Data have to be erased to comply with law.</p> <p>We may continue to process Your Personal Data in certain circumstances in accordance with Data Protection Laws. Where you have requested the erasure of Your Personal Data, we will inform recipients to whom that Personal Data have been disclosed, unless this proves impossible or involves disproportionate effort. We will also inform you about those recipients if you request it.</p>
Right to Restriction of Processing (Article 18 GDPR)	<p>You may request that we stop processing Your Personal Data temporarily if (i) you do not think that Your Personal Data is accurate (but we may start processing again once we have checked and confirmed that it is accurate); (ii) the processing is unlawful but you do not want us to erase Your Personal Data; (iii) we no longer need the Personal Data for our processing; or (iv) you have objected to processing because you believe that your interests should override the basis upon which we process Your Personal Data.</p> <p>If you exercise your right to restrict us from processing Your Personal Data, we will continue to process the Personal Data if: (i) you consent to such processing; (ii) the processing is necessary for the exercise or defence of legal claims; (iii) the processing is necessary for the protection of the rights of other individuals or legal persons; or (iv) the processing is necessary for public interest reasons.</p>

Right	Further Information
Right to Data Portability (Article 20 GDPR)	You may ask for an electronic copy of Your Personal Data that you have provided to us and which we hold electronically, or for us to provide this directly to another party. This right only applies to Personal Data that you have provided to us – it does not extend to data generated by us. In addition, the right to data portability also only applies where (i) the processing is based on your consent or for the performance of a contract; and (ii) the processing is carried out by automated means.
Right to be informed	You have the right to clear, transparent and easily understandable information about your rights and about how we use Your Personal Data. We use this Policy to inform you of your rights.
Right to Withdraw Consent	Where processing is based on your consent, you have the right to withdraw your consent at any time with future effect by contacting us. However, if you do withdraw your consent we may not be able to continue to provide the service we offer to you.
Right to ask us to stop contacting you with direct marketing	<p>We have a legitimate interest to send you electronic communications in connection with the Service and related matters (which may include but shall not be limited to newsletters, announcement of new features etc. and which may also appear on social media platforms such as Facebook, LinkedIn, Twitter or Instagram). We may also ask you for your consent to send you direct marketing from time to time.</p> <p>You may be able to select your preferences with respect to direct marketing when registering Your Account. We may also ask you different questions for different services, including competitions. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.</p> <p>You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please (i) click on ‘unsubscribe’ on an email; (ii) respond ‘stop’ on an SMS to a number notified to you; or (iii) send an email via ‘How to Contact Us’ below.</p> <p>We will provide you with information on action taken on a request to stop direct marketing - this may be in the form of a response email confirming that you have ‘unsubscribed’. Unsubscribing from direct marketing does not unsubscribe you from essential electronic communications in respect of the administration of Your Account.</p>
Rights in relation to automated decision making	You may ask us to ensure that, if we are evaluating you, we don’t base any decisions solely on an automated process and have any decision reviewed by a member of staff. Profiling may occur in relation to Your Personal Data for the purposes of targeted advertising and de-targeting you from specified advertising. This allows us to tailor our advertising to the appropriate customers and helps to minimise the risk of you receiving unwanted advertising. These rights will not apply in all circumstances, for example

Right	Further Information
	where the decision is (i) authorised or required by law, (ii) necessary for the performance of a contract between you and us, or (ii) is based on your explicit consent. In all cases, we will endeavour that steps have been taken to safeguard your interests.
Right to Complain to the DPC	If you do not think that we have processed Your Personal Data in accordance with this Policy, please contact us in the first instance (see 'How to Contact Us' below). If you are not satisfied, you can complain to the DPC or exercise any of your other rights pursuant to Data Protection Laws. Information about how to do this is available on the DPC website at https://www.dataprotection.ie .

8. WHO WE SHARE YOUR INFORMATION WITH

We may share Your Personal Data with any of our Affiliates as detailed in Section 1. Affiliates are the HRI subsidiary entities. These are:

- Leopardstown Club Ltd
- Tipperary Race Company plc
- Fairyhouse Club Ltd
- Navan Races Ltd
- Cork Racecourse Ltd
- HRI Racecourses Ltd
- Irish Thoroughbred Marketing Ltd
- Tote Ireland Ltd
- Tote Arena Ltd

We will not share Your Personal Data without having a lawful basis to do so. If our Business is acquired or merged with another company, Your Personal Data may be transferred to the new owners so that we may continue to sell products and Services to you. If we become involved in a merger, acquisition, or any form of sale of

some of all of its assets, Your Personal Data will not be transferred to any third party unless there are adequate safeguards in place with the recipient in respect of the security of Your Personal Data.

We restrict access to Your Personal Data to employees, contractors, and agents who need such access in order to operate, develop, or improve our Service. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination, civil litigation and/or criminal prosecution, if they fail to meet these obligations.

We may also share Your Personal Data with our third party suppliers who assist us in the provision of the Service (subject to having appropriate contracts in place with such third parties).

Your Personal Data may be disclosed to a third party if we are required to do so because of an applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding in Ireland or abroad.

We may need to disclose your personal information to any relevant regulatory or sporting body e.g. the Irish Horseracing Regulatory Board (subject to HRI having appropriate data sharing agreements in place with the regulator) to enable them to conduct investigations, enforce regulations or impose sanctions, to protect the integrity of horse-racing in Ireland.

We may share your data with our trusted data partners for the purposes of direct marketing, as a legitimate interest of our business (or a legitimate interest of their business) or with your consent. You will be given the opportunity on every communication that we send you to indicate that you no longer wish to receive direct marketing material.

9. HRI LOYALTY PROGRAMME

Where you have consented to participating in our Loyalty Programme, we will share your personal data with Rewards4Racing Limited (“**R4R**”), the entity that we have collaborated with to provide the rewards programme to our customers. For further information on how R4R handles your personal information, please visit the [R4R website](#) and read the [R4R privacy policy](#). Your personal data is shared to facilitate the administration and management of the Loyalty Programme, but also may involve profiling you based on the interests and preferences that you have demonstrated to us in your interactions on our websites, for direct marketing purposes. This will enable R4R to promote and market products or services to you that align with your profile behaviour. You have the right to withdraw your consent to participating in the Loyalty Programme by contacting us using the information provided in the ‘How to contact us’ section below. As set out at paragraph 7 above, you also have the right to ask us (or R4R in this case) to stop contacting you with direct marketing material. You will be given the opportunity to stop direct marketing in every marketing communication that you receive from R4R.

10. **FILMING OF RACES, PHOTOGRAPHY AND IMAGES**

Photography and filming will take place at horse racing and related events. Photographs and videos will be taken by photographers and videographers engaged directly by Horse Racing Ireland in addition to third party photographers. Horse Racing Ireland may use personal data in the form of photographs and videos to produce and publish content online and in print for the purposes of the promotion of the Irish horseracing industry (in accordance with its statutory functions).

Horse Racing Ireland will seek the consent of data subjects for the use of photographs in certain circumstances.

If you have been asked to give your consent, you can withdraw this consent at any time by contacting dpo@hri.ie. Please note that withdrawing your previously given consent does not affect the processing of your personal data that had already taken place before the withdrawal, in particular with regard to photos or videos that were published in printed publications or online.

11. **NON-EEA PERSONAL DATA TRANSFERS**

Your Personal Data may be transferred to, stored at, or accessed from a destination outside the EEA (a 'third country') for the purposes of us providing the Service. It may also be processed by staff operating outside the EEA who work for us, another corporate entity within our group, or any of our suppliers. We will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and to an acceptable EU standard. The safeguards in place with regard to the transfer of your personal data to third countries shall include (but shall not be limited to) reliance by us on a decision of the European Commission confirming an adequate level of data protection in the respective third country (under Article 45 of the GDPR), the entry by us into appropriate contracts with third parties incorporating standard contractual clauses approved by the European Commission where required (under Article 46 of the GDPR) or reliance upon other appropriate safeguards and the carrying out of risk assessments and adoption of supplementary and/or mitigating measures to ensure compliance with Data Protection Laws.

The Loyalty Programme mentioned above will involve transfer of your personal data to and from the UK (where R4R are based). The UK is currently subject to an adequacy decision under Article 45 of the GDPR that was adopted by the European Commission on 28 June 2021.

Where we transfer Your Personal Data to a third country, we will ensure a valid transfer mechanism under Chapter V of the GDPR (such as those under Articles 45 and 46 noted above) is in place to ensure compliance with Data Protection Laws.

Where you opt-in to receiving our WhatsApp marketing communications, WhatsApp may transfer your personal data outside of the EEA to its sub-processors or other third parties in order to provide this service. For further information about how WhatsApp processes your personal data, please consult WhatsApp's Privacy Policy.

12. **THIRD PARTY WEBSITES**

This Policy applies to websites and services that are owned and operated by us. We do not exercise control over the sites/applications that may be linked from the Service. You may see 'social buttons' during your use of the Website(s), including but not limited to Twitter, Facebook, LinkedIn and Instagram which enable you to

share or bookmark certain web pages. These websites and social platforms have their own cookies and privacy practices, which are controlled by them. These other sites/applications may place their own cookies or other files on your computer, collect data or solicit personal information from you. You acknowledge that the Service may enable or assist you to access the Website(s) content of, correspond with, and purchase goods and services from, third parties via third-party websites and that you do so solely at your own risk. We make no representation or commitment and shall have no liability or obligation whatsoever in relation to the content or use of, or correspondence with, any such third-party website, or any transactions completed, and any contract entered into by you, with any such third party and the use by any such third-party of Your Personal Data. We do not endorse or approve any third-party website nor the content of any of the third-party website made available via the Service. We encourage you to carefully familiarize yourself with the terms of use and privacy policies applicable to any websites and/or services operated by third parties. Please be aware that we are not responsible for the privacy practices of any third parties.

13. **OFFENSIVE CONTENT**

If Your Personal Data or any User Uploaded Data contains any material which may reasonably be deemed to be offensive, inappropriate or objectionable or you otherwise engage in any disruptive behaviour in relation to the Service, we may remove such content and/or suspend the use of Your Account at any time. We may also remove any such material from any of our social media pages.

Where we reasonably believe that you are or may be in breach of any applicable laws, for example on hate speech, we may disclose Your Personal Data to relevant third parties, including to law enforcement agencies or your internet provider. We would only do so in circumstances where such disclosure is permitted under applicable laws, including Data Protection Laws.

14. **HOW WE PROTECT YOUR PERSONAL DATA**

We do our utmost to protect user privacy through the appropriate use of security technology. We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks that are presented by the processing of Your Personal Data. In particular, we consider the risks presented by accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Your Personal Data transmitted, stored or otherwise processed.

The Personal Data you provide to us is protected using SSL (Secure Socket Layer) technology. SSL is the industry standard method of encrypting personal information and credit card details so that they can be securely transferred over the internet. All payment details are transmitted over SSL across dedicated network infrastructure (Multiprotocol Label Switching-MPLS) and stored in compliance with Payment Card Industry Data Security Standards (PCI DSS).

We restrict access to Your Personal Data to employees, contractors and agents who need to know Your Personal Data in order to operate, develop or improve the Services. We ensure that we have appropriate physical and technological security measures to protect your information; and we ensure that when we outsource any processes that the service provider has appropriate security measures in place. However, our Website(s) may contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including cookies. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect Your Personal Data, we cannot guarantee the security of any data transmitted to us and any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. To the extent permitted by law, we are not responsible for any delays, delivery failures, or any other loss or damage resulting from (i) the transfer of data over communications networks and facilities, including the internet, or (ii) any delay or delivery failure on the part of any other service provider not contracted by us, and you acknowledge that our Service may be subject to limitations, delays and other problems inherent in the use of such communications facilities. You will appreciate that we cannot guarantee the absolute prevention of cyber-attacks such as hacking, spyware and viruses. Accordingly, you will not hold us liable for any unauthorized disclosure, loss or destruction of Your Personal Data arising from such risks.

All information you provide to us is stored on our (or contracted third party) secure servers. Where we have given you (or where you have chosen) a password which enables you to access any part of our Service, you are responsible for keeping this password confidential. We ask you not to share a password with any person not authorised to use the Service.

15. **PERSONAL DATA BREACH REPORTING**

We will notify serious Personal Data Breaches in respect of Your Personal Data to the DPC without undue delay, and where feasible, not later than 72 hours after having become aware of same. If notification is not made after 72 hours, we will record a reasoned justification for the delay. However, it is not necessary to notify the DPC where the Personal Data Breach is unlikely to result in a risk to the rights and freedoms of natural persons. A **Personal Data Breach** in this context means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

We will keep a record of any Personal Data Breaches, including their effects and the remedial action taken, and will notify you of any Personal Data Breach affecting Your Personal Data (which poses a high risk to you) when we are required to do so under Data Protection Laws. We are not required to notify you of a Personal Data Breach where (i) we have implemented appropriate technical and organisational measures that render Your Personal Data unintelligible to anyone not authorised to access it, such as encryption; (ii) we have taken subsequent measures which ensure that the high risk to data subjects is not likely to materialise; or (iii) it would involve disproportionate effort, in which case we may make a public communication instead.

16. **RETENTION OF PERSONAL DATA**

Your Personal Data will be kept and stored for such period of time as we deem necessary taking into account the purpose for which it was collected in the first instance. This may include retaining Your Personal Data as necessary to administer Your Account, comply with our legal obligations, resolve disputes, enforce our agreements, support business operations, and continue to develop and improve our Service.

Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Service, not to specifically analyse personal characteristics about you.

17. **AMENDMENTS TO POLICY**

We may change our Policy from time to time and at our sole discretion. The date of the most recent revisions will appear on the top of this Policy. If you do not agree to these changes, please do not continue to use the Service to submit Your Personal Data. If material changes are made to the Policy, we will notify you by placing a prominent notice on our Website(s) or by sending you a notification in relation to this.

18. **HOW TO CONTACT US**

If you need to contact us with regard to any of your rights as set out in this Policy, all such requests should be made in writing by email to dpo@hri.ie or by post to Data Protection Officer, Horse Racing Ireland, Ballymany, The Curragh, Co. Kildare.