

PRIVACY STATEMENT

TINCOMY LIMITED (TRADING AS “EQUINE MEDIRECORD”)

1. Introduction

We are committed to protecting the privacy of our customers and we take the responsibility regarding the security of customer information very seriously. Our website Privacy Statement – to be read in conjunction with the Terms and Conditions for the use of the Equine Medirecord Mobile Application and Website (the “**Terms**”), which can be viewed at https://www.equinemedirecord.com/terms-and-conditions/?_ga=2.25617405.1700456127.1525264511-866482531.1518452009 – sets out what personal data we collect and process about you in connection with our business; where we obtain the data from; what we do with that data; who we transfer/disclose that data to; how we deal with your data protection rights; and how we comply with the data protection rules. Any personal data is collected and processed in accordance with Irish and EU data protection laws.

2. Data controller

“Equine MediRecord” (referred to as “**we**”, “**us**”, “**our**” or “**Equine MediRecord**” in this statement) in this statement primarily refers to TINCOMY LIMITED (trading under the registered business name “Equine MediRecord”), a company registered in Ireland with a registered address at Eyrefield House, Eyrefield Road, the Curragh, Co. Kildare R56 Pw01, Ireland. Our company registration number is 599476. Tincomy Limited is the “data controller” of all personal information that is collected and used about Equine MediRecord’s customers.

3. What personal data we collect

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, payment details and information about your access to our mobile application (the “App”) and/or website.

We may collect personal data from you create or request an Equine MediRecord account, use our website and/or App and other websites accessible through our website and/or App, participate in a survey or competition or contact us.

Specifically, we may collect the following categories of information:

- a. Name, home address, e-mail address, telephone number, passport or other recognized personal ID card numbers, credit/debit card or other payment details;
- b. Information about your use of our website and App;
- c. The communications you exchange with us or direct to us via letters, emails, chat service, calls, and social media.

- d. Location, including real-time geographic location of your computer or device through GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, if you use location-based features and turn on the Location Services settings on your device and computer.

4. What do we use your personal data for

Your data may be used for the following purposes:

- a. The medication records for horses and the accompanying horse details, that is mandated under the rules of racing set down by the Irish Horseracing Regulatory Board, may be passed onto the Irish Horseracing Regulatory Board.
- b. Credit or other payment card verification/screening: we use your payment information for accounting, billing and audit purposes and to detect and / or prevent any fraudulent activities;
- c. Administrative purposes: We may use your data for Statistical and marketing analysis, systems testing, customer surveys, maintenance and development;
- d. Security, health, administrative, crime prevention/detection: we may pass your information to government authorities or enforcement bodies for compliance with legal requirements;
- e. Customer Services communications: we may use your data to manage our relationship with you as our customer and to improve our services and experiences for customers;
- f. Provide tailored services: we may use your data to provide information we believe is of interest to you, prior to, during, and after your travel with us and to personalise the services we offer to you;
- g. Marketing: from time to time we or our selected partners may contact you with information regarding equine products, medication and health services and ancillary products via e-communications. With your agreement we may disclose your information to trusted third-party ancillary service providers such as equine pharmaceutical, specialist equine retailers and credit card providers for the purposes described in this Privacy Statement. You will have the choice to **opt in or out** of receiving such communications by indicating so at the Equine MediRecord account registration stage. You will also be given the opportunity on every e-communication that we or our trusted partners send you to indicate that you no longer wish to receive our or their direct marketing material. You can at any time **opt-out** from receiving marketing material by indicating so in the Marketing Preferences Section of your Equine MediRecord account.

We will retain your personal data for as long as we need it in order to fulfil our purposes set out in this Privacy Statement or in order to comply with the law.

5. Security of your personal data

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage. The 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 may disclose your information to trusted third parties for the purposes set out in this Privacy Statement. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with Irish and EU law on data protection standards.

Equine MediRecord operates businesses in multiple jurisdictions, some of which are not located in the European Economic Area (EEA). While countries outside the EEA do not always have strong data protection laws, we require all services providers to process your information in a secure manner and in accordance with Irish and EU law on data protection.

6. Sharing your personal data

Your personal data may be shared with other companies within the Equine MediRecord Group.

We may also share your personal data with the following third parties for the purpose described in this Privacy Statement:

- a. Government authorities, law enforcement bodies and regulators for compliance with legal requirements;
- b. Partners such as racing bodies required to deliver the services you have asked for, such as Horse Racing Ireland;
- c. Trusted service providers we are using to run our business such as Amazon Web Services and call centres providing assistance to our customers;
- d. Credit and debit card companies, and anti-fraud screening, which may need information about your method of payment to process payment or ensure the security of your payment transaction;
- e. Law firms, law courts and law enforcement bodies in order to enforce our legal rights in relation to our contract with you;
- f. Our trusted third party ancillary partners who offer related products and services on our website: If you choose to purchase products or services offered on our websites by third parties such as , we may disclose your personal data, such as your contact details and your billing information to that third party. We are not responsible for third parties' use of your personal data where such use is permitted for their own purposes. Please consult their privacy statements for further information.
- g. Social media: You may be able to access third party social media services through our website or App or before coming to our website or App. When you are registered with your social service account, we will obtain the personal information you choose to share with us through these social media services pursuant to their privacy settings in order to improve and personalize your use of our website or App. We may also use social media plugins on our website or App. As a result your information will be shared with your social

media provider and possibly presented on your social media profile to be shared with others in your network. Please refer to the Privacy Statement of these third-party social media providers to find out more about these practices.

7. Your Equine MediRecord Account

All data collected upon registration for your Equine MediRecord account will be processed in line with this Privacy Statement and the “Registration as a User” section of the Terms.

We will delete any information of a person collected without the person’s consent, as soon as we learn about it.

As part of the registration process, and specifically to verify your identity, we may ask a regulatory agency charged with regulating horseracing in your jurisdiction, such as the Turf Club, Irish National Hunt Steeplechase Committee or British Horseracing Authority (as applicable), to indicate to us that you or your business(es) is a registered horseracing trainer/breeder and to supply us with your unique registration reference number as maintained by the applicable regulatory agency. By registering for an Equine MediRecord account, and subject to the accompanying Terms, you hereby expressly give us permission to seek verification of your registration status with the applicable regulatory agency and to hold such details on our database.

We understand the importance of taking extra precautions to protect the privacy and safety of children. Accordingly, children under 18 will not be permitted to open an Equine MediRecord account. We will delete any Equine MediRecord account created by a child under 18, as soon as we learn about it.

You will have the option to stay signed-in into your Equine MediRecord account by checking the “remember me” box. This option will only apply to the computer / device and the browser that you’re using when you select the box. If you do not wish to stay signed on a particular browser, simply sign out of your Equine MediRecord account on that browser.

You may delete your Equine MediRecord account by contacting Equine MediRecord at info@equinemedirecord.com.

8. Cookies & site tracking

This site uses cookies to enable us to improve our service to you and to provide certain features that you may find useful (for Equine MediRecord’s Cookie Policy go to www.equinemedirecord.com/cookie-policy/). This may include cookies of media and advertising partners that are being placed on your machine when visiting our website or App. Please visit our partners’ websites for information on their privacy and cookie policy.

Cookies are small text files that are transferred to your computer's hard drive through your web browser to enable us to recognise your browser and help us to track visitors to our site; thus enabling us to understand better the products and services that will be most suitable to you. A cookie contains your contact information and information to allow us to identify your computer when you travel around our site for the purpose of helping you accomplish your reservation. Most web browsers automatically accept cookies, but, if you wish, you can set your browser to prevent it from accepting cookies. The "help" portion of the toolbar on 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, or how to disable cookies altogether. The cookies we use do not detect any information stored on your computers.

For more information about cookies and how to stop cookies being installed visit the following website: <http://www.allaboutcookies.org>.

We use tracking software to monitor customer traffic patterns and site usage to help us develop the design and layout of the websites. This software does not enable us to capture any personal user information.

9. Your data protection rights

You have a right to request access to and rectification or erasure of personal data we hold about you or restriction of processing concerning this personal data or to object to processing as well as the right to data portability. You further have the right to lodge a complaint with a Supervisory Authority. The Lead Supervisory Authority with respect to Equine MediRecord is the Data Protection Commissioner in Ireland.

All requests in relation to your data protection rights must be emailed to info@equinemedirecord.com or posted to Equine MediRecord at Eyrefield House, the Curragh, Killcullen, County Kildare, Ireland. In order to be processed, any requests must be submitted with the following documents:

- a. A completed access request – for further details on the access request, please see the website of the Data Protection Commissioner at <https://www.dataprotection.ie/docs/Accessing-Your-Personal-Information/r/14.htm>;
- b. A completed signed authority from any third party who requests data on your behalf;
- c. A copy of your passport or national ID, so that we can verify your identity.

10. Changes to Privacy Statement

Our Privacy Statement may change from time to time and any changes to the statement will be posted on this page.