

Customer Privacy Notice (General)

INTRODUCTION

Welcome to Burns Pet Nutrition Ltd's privacy notice.

Burns Pet Nutrition Ltd ('Burns') respects your privacy and is committed to protecting your personal data. This privacy notice will:

- (a) inform you as to how we look after your personal data when you:
 - visit our websites (regardless of where you visit them from);
 - buy goods from us;
 - use our advice helpline;
 - sign up to one of our newsletters such as Tailchaser Times;
 - sign up to one of our community groups / schemes such as Lead the Way, Puppy Club and the Breeder Scheme (each of which have their own terms and conditions that apply);
 - use our dog grooming services;
 - take part in our loyalty scheme;
 - sign up to receive promotional offers from us;
 - enter a competition;
 - attend one of our events;
 - have contact with us generally;

- (b) tell you about your privacy rights and how the law protects you.

Please use the Glossary (found at the end of this document) to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Burns collects and processes your personal data through your use of our websites, including any data you may provide through our websites when you sign up to one of our newsletters, join one of our community groups / schemes, purchase a product or service or take part in a competition. It will also tell you about how we use your personal data when you visit our premises, use our advice helpline, use our dog grooming services, take part in our loyalty scheme, sign up to receive promotional offers from us, attend one of our events or have contact with us generally.

Our websites are not intended for children and we do not knowingly collect data relating to children through them.

It is important that you read this privacy notice together with any other privacy notice or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and privacy policies and is not intended to override them. Please note that some of our community groups and schemes have terms and conditions that apply to them. This privacy notice should be read together with those terms and conditions.

CONTROLLER

Burns Pet Nutrition Ltd is the controller and responsible for your personal data (collectively referred to as "Burns", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights* (see section 9 below), please contact the data privacy manager using the details set out below.

CONTACT DETAILS

If you have any questions about this privacy notice or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Burns Pet Nutrition Ltd (a company incorporated in England and Wales with company registration number 04181441)

Email address: dataprotection@burnspet.co.uk

Postal address: 99 Ferry Road, Kidwelly, Dyfed, SA17 5EJ

Telephone number: 01554 890482.

THE INFORMATION COMMISSIONER'S OFFICE

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (you can find out more by visiting the ICO website at: www.ico.org.uk).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so we would be grateful if you would please contact us in the first instance.

For your information, our registration number at the ICO is Z1427179.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy notice under regular review. This version was last updated in December 2020.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

Our websites 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 websites, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender;
- **Contact Data** includes contact address, billing address, delivery address, delivery instructions, email address and telephone numbers;
- **Pet Data** includes data about the pets that you have;
- **Financial Data** includes bank account and payment card details;
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us including online order numbers and details of deliveries due to be made to you / deliveries made to you;
- **Technical Data** includes 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 websites;
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;
- **Usage Data** includes information about how you use our websites, products and services and how you interact with our communications, including electronic communications;
- **Marketing & Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences;
- **Event Data** includes details of any of our events that you wish to attend / have attended;
- **Photograph Data** includes any data captured about you by photographs in which you appear;
- **CCTV Data** includes any data captured about you by CCTV cameras that are installed at some of our premises;
- **Visitor Book Data** means the data that you enter into our visitor book when you visit any of our premises. This includes your name, data of visit and who you were going to meet.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **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 your 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.

IF YOU FAIL 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.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity Data, Contact Data, Pet Data, Financial Data, Transaction Data, Profile Data, Marketing & Communications Data, Event Data, Photograph Data, CCTV Data or Visitor Book Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - buy our products;
 - create an account on our websites;
 - subscribe to one of our newsletters such as our quarterly e-magazine the Tailchaser Times;
 - join one of our community groups / schemes such as Lead the Way, Puppy Club and / or Breeder Scheme;
 - use our advice helpline;
 - use our dog grooming services;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey;
 - give us feedback or contact us;
 - sign up to attend one of our events, or speak to us at an event at which we are present;
 - engage with us on social media;
 - visit our premises.
- **Automated technologies or interactions.** As you interact with our websites, we will automatically collect Technical Data and / or Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see the *cookie policy* on our websites for further details. We may also collect Usage Data through our electronic communications. For example, we may track email open rates by using pixels in email communications that we send you.
- **Third parties or publicly available sources.** We may receive / may obtain personal data about you from various third parties and public sources as set out in the table below:

Third Party Type:	Category of Data Collected:
Analytics providers such as Google and ResponseTap and advertising networks	Technical Data and Usage Data
Providers of online review services such as Reevo	Identity Data, Usage Data and Profile Data
Providers of technical, payment and delivery services	Identity Data, Contact Data, Financial Data and Transaction Data
Third party stockists of our products who have asked us to deliver an order directly to you	Identity Data and Contact Data
Our wholesalers (where you, or an organisation you work for, are a stockist of our products and have purchased our products from our wholesaler)	Identity Data, Contact Data and details of products purchased
IT, business administration and e-marketing service providers (who are acting as our data processors)	Identity Data, Contact Data, Pet Data, Transaction Data, Technical Data, Profile Data, Usage Data, Marketing &

	Communications Data and Event Data
Third party event organisers	Identity Data, Contact Data, Event Data and Photograph Data
Organisations that employ you / organisations for which you are a point of contact	Identity Data and Contact Data
Other organisations that we work with who may send us (on your behalf) Burns Pet Nutrition forms that you have completed	Identity Data, Contact Data, Pet Data and Marketing & Communications Data
Other organisations that we work with who may send us your details so that we can add you to our electronic mailing lists (where you have consented to this) and / or so that we can provide you with goodie bags etc	Identity Data, Contact Data and Marketing & Communications Data
Publicly available sources such as Companies House and the Electoral Register	Identity Data and Contact Data
Credit reference agencies (only where you have applied for a credit account with us)	Identity Data, Contact Data and any data that may be relevant to your credit score

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

You can find out more about the types of lawful basis that we will rely on to process your personal data in the Glossary section below.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. Where required by law we will also ask you for consent for us to send you direct marketing communications by email and / or text. You have the right to withdraw consent to marketing at any time.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

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. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To:</p> <p>(a) enable you to create an account on our website www.burnspet.co.uk; or</p> <p>(b) register you as a new customer; or</p> <p>(c) register you as person interested in learning more about Burns; or</p> <p>(d) register an organisation for which you are a point of contact as a new customer.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Technical</p> <p>(e) Profile</p> <p>(f) Marketing & Communications</p>	<p>(a) Necessary to comply with a legal obligation;</p> <p>(b) Performance of a contract with you;</p> <p>(c) Necessary for our legitimate interests (to be able to liaise with a point of contact within an organisation, to be able to liaise with prospective customers and to understand your contact preferences);</p> <p>(d) Consent, where applicable, to the use of non-essential cookies on our websites.</p>
<p>To process and deliver orders including:</p> <p>(a) managing payments, fees and charges;</p> <p>(b) collecting and recovering money owed to us;</p> <p>(c) arranging for delivery of products* directly to you where you have ordered them from our online shop;</p> <p>(d) arranging for delivery of products* directly to you where we have agreed to send you pet food samples;</p> <p>(e) arranging for delivery of products* directly to you when requested by a third party.</p> <p>* We use third parties to make deliveries</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Technical</p> <p>(f) Profile Data</p> <p>(g) Marketing & Communications</p>	<p>(a) Necessary to comply with a legal obligation;</p> <p>(b) Performance of a contract with you;</p> <p>(c) Necessary for our legitimate interests (to recover debts due to us, to enable us to liaise with a point of contact within an organisation, to deliver pet food samples and to deliver third party orders);</p> <p>(d) Consent, where applicable, to the use of non-essential cookies on our websites.</p>
<p>To provide our pet grooming services including:</p> <p>(a) booking a grooming appointment;</p> <p>(b) sending you email / text reminders about your grooming appointment;</p> <p>(c) providing the pet grooming services;</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Financial</p> <p>(e) Transaction</p>	<p>(a) Necessary to comply with a legal obligation;</p> <p>(b) Performance of a contract with you;</p> <p>(c) Necessary for our legitimate interests (to remind you about your upcoming appointment, to recover debts due to us).</p>

<p>(d) managing payments, fees and charges;</p> <p>(e) collecting and recovering money owed to us.</p>		
<p>To:</p> <p>(a) register you as a member of one of our community groups / schemes such as Lead the Way, Puppy Club and/or the Breeder Scheme and to deliver to you the relevant community group / scheme benefits;</p> <p>(b) register an organisation for which you are a point of contact as a member of one of our community groups and to deliver to that organisation the relevant community benefits;</p> <p>(c) review how people engage with our community groups / schemes.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Financial</p> <p>(e) Transaction</p> <p>(f) Profile</p> <p>(g) Usage</p> <p>(h) Marketing & Communications</p>	<p>(a) Performance of a contract with you;</p> <p>(b) Necessary for our legitimate interests (to promote and grow our business, keep our records updated, to study how customers use our products/services and to enable us to engage with an organisation for which you are a point of contact);</p> <p>(c) Consent (only in so far as we are required by law to obtain your consent to contact you by email / text for marketing purposes).</p>
<p>Loyalty Club Programme:</p> <p>Where you are a stockist / are a point of contact at a stockist, we will use your Personal Data for the following purposes:</p> <p>(a) To sign you up to our loyalty programme and to administer and manage the loyalty programme;</p> <p>(b) To register an organisation for which you are a point of contact as a member of our loyalty programme and deliver to that organisation the relevant loyalty programme benefits;</p> <p>(c) To manage the loyalty programme and review how people engage with our loyalty programme.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing & Communications</p>	<p>(a) Necessary to comply with a legal obligation;</p> <p>(b) Performance of a contract with you;</p> <p>(c) Necessary for our legitimate interests (to grow and develop our business, keep our records updated, study how customers use our products/services and to enable us to engage with an organisation for which you are a point of contact);</p> <p>(d) Consent (only in so far as we are required by law to obtain your consent to contact you by email / text for marketing purposes).</p>

<p>To manage our relationship with you which will include:</p> <p>(a) responding to any enquiry you raise or request you make;</p> <p>(b) dealing with complaints;</p> <p>(c) notifying you about changes to our terms or privacy notice;</p> <p>(d) asking you to leave a review or take a survey.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Profile</p> <p>(e) Usage</p> <p>(f) Marketing & Communications</p>	<p>(a) Necessary to comply with a legal obligation;</p> <p>(b) Performance of a contract with you;</p> <p>(c) Necessary for our legitimate interests (to grow and develop our business, keep our records updated, study how customers use our products/services and to enable us to engage with an organisation for which you are a point of contact).</p>
<p>To manage our relationship with wholesalers and stockists of our products.</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Necessary for our legitimate interests (to study how our products are purchased/sold, to grow our business and to enable us to engage with an organisation for which you are a point of contact).</p>
<p>To enable you to partake in a prize draw, competition or complete a survey.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Profile</p> <p>(e) Usage</p> <p>(f) Marketing & Communications</p>	<p>(a) Performance of a contract with you;</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).</p>

<p>To administer, develop, grow and protect our business and our websites including:</p> <p>(a) troubleshooting;</p> <p>(b) testing;</p> <p>(c) system maintenance;</p> <p>(d) support;</p> <p>(e) hosting of data;</p> <p>(f) data analysis;</p> <p>(g) protecting the security of our buildings and staff;</p> <p>(h) resolving complaints;</p> <p>(i) carrying out credit reference checks (where an application for credit has been made);</p> <p>(j) carrying out financial reporting and audits; and</p> <p>(k) carrying out market research / product development research.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Financial</p> <p>(e) Transaction</p> <p>(f) Technical</p> <p>(g) Profile</p> <p>(h) Usage</p> <p>(i) Marketing & Communications</p> <p>(j) Event</p> <p>(k) Photograph</p> <p>(l) CCTV</p> <p>(m) Visitor Book</p>	<p>(a) Necessary to comply with a legal obligation;</p> <p>(b) Necessary for our legitimate interests (for running our business, to study how customers use our products/services and to develop them and grow our business, to study how customers interact with our electronic communications, to protect the security of our buildings and staff, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).</p>
<p>To:</p> <p>(a) allow you to participate in interactive features of our online services when you choose to do so (such as live chat); and</p> <p>(b) study whether there are any emerging themes in the questions that we are asked.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Technical</p> <p>(e) Profile</p> <p>(f) Usage</p> <p>(g) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (to answer any questions you may have, study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy);</p> <p>(b) Consent, where applicable, to the use of non-essential cookies on our websites.</p>

<p>To:</p> <p>(a) sign you up to receive promotional offers and discounts (either by post or electronically); and / or</p> <p>(b) send you promotional offers and discounts.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Profile</p> <p>(e) Usage</p> <p>(f) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (to define types of customers for our products and services, to develop our business and to inform our marketing strategy);</p> <p>(b) Consent (only where we send you marketing or promotional material by email and / or text and the law requires that we obtain your consent to do so).</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>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Technical</p> <p>(e) Profile</p> <p>(f) Usage</p> <p>(g) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy);</p> <p>(b) Consent, where applicable, to the use of non-essential cookies on our websites.</p>
<p>To register you for news alerts.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Marketing & Communications</p>	<p>(a) Necessary for our legitimate interests (to define types of customers for our products and services, to develop our business and to inform our marketing strategy);</p> <p>(b) Consent (only where we send you direct marketing by email and / or text and the law requires that we obtain your consent to do so).</p>
<p>To register you to receive our newsletters including our quarterly e-magazine Tailchaser Times and to send to you the newsletter that you have subscribed to.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Marketing & Communications</p>	<p>(a) Necessary for our legitimate interests (to develop our business and to inform our marketing strategy);</p> <p>(b) Consent (only where we send you an e-magazine by email and the law requires that we obtain your consent to do so).</p>
<p>To use data analytics to improve our websites, products/services, marketing, customer relationships and experiences.</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>(a) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our websites updated and relevant, to develop our business and to inform our marketing strategy);</p>

		(b) Consent, where applicable, to the use of non-essential cookies on our websites.
To make suggestions and recommendations to you about goods or services or events that may be of interest to you.	(a) Identity (b) Contact (c) Pet (d) Technical (e) Usage (f) Profile (g) Marketing & Communications	(a) Necessary for our legitimate interests (to develop our products/services and grow our business); (b) Consent (only where we send you direct marketing by email and / or text and the law requires that we obtain your consent to do so).
To organise, manage and promote an event or other function that you have signed up to attend.	(a) Identity (b) Contact (c) Pet (d) Profile (e) Usage (f) Marketing & Communications (g) Event (h) Photograph	(a) Necessary for our legitimate interests (to develop our products/services and grow our business); (b) Consent (only where you can be identified in a photograph that we wish to use); (c) Necessary to comply with a legal obligation.
Please note that in carrying out the above tasks we may need to work with third parties. You can find out more about this in section 5 (Disclosures of Your Personal Data) below.		

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM US

We may use your Identity Data, Contact Data, Pet Data, Technical Data, Profile Data, Usage Data & Marketing and Communications Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have:

- ✓ requested information from us or purchased goods or services from us;
- ✓ entered into a competition;
- ✓ signed up to one of our community groups / schemes such as Lead the Way, Puppy Club and/or the Breeder Scheme;
- ✓ subscribed to one of our newsletters such as Tailchaser Times;
- ✓ signed up to receive promotional offers from us;
- ✓ signed up to our loyalty scheme;
- ✓ received a rehoming pack;
- ✓ engaged with one of the Burns campaigns;
- ✓ attended one of our events,

and you have not opted out of receiving that marketing.

DIRECT MARKETING BY EMAIL AND TEXT

Although our general approach to marketing is to only send marketing communications by email and text to individuals where we have their consent to do so (such consent can be withdrawn at any time), we may send marketing communications to companies, Scottish partnerships, limited liability partnerships or government bodies by email and text without consent (in this case our legal basis of processing would be legitimate interests).

We use a third-party provider to deliver our electronic marketing communications. We gather information around email opening and clicks using industry standard technologies (such as pixels / gifs) to help us monitor and improve our electronic marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for their own marketing purposes.

OPTING OUT

You can ask us or our third-party data processors to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us (using the contact details set out above) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly. For more information about the cookies we use, please see the cookie policy on our websites.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent where this is required or permitted

by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table at section 4 above.

- External Third Parties as set out in the *Glossary* below.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

6. INTERNATIONAL TRANSFERS

Generally, we store and therefore process your personal data in the United Kingdom (**UK**). However, some of our External Third Parties are based inside the UK but may transfer your personal data outside the UK. Further, some of our External Third Parties are based outside the UK and so this may involve a transfer of your personal data outside the UK. For example, we may transfer your personal data to countries based in the European Economic Area (**EEA**). We may also transfer your data to countries based outside the EEA.

When transferring your personal data outside the UK we may transfer your data to countries that have been deemed to provide an adequate level of protection for personal data by the UK / European Commission. Where we use certain service providers, we may use specific contracts approved by the UK / European Commission which give personal data the same protection it has in the UK / Europe.

You can find out more about the above by contacting our data privacy manager.

7. 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. Our employees 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 of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see section 9 *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You may have the right to:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

You can find out more about these rights by reading the Glossary section below. If you wish to exercise any of the rights set out above, please contact our data privacy manager using the contact details set out above.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. **GLOSSARY**

MORE INFORMATION ABOUT THE LAWFUL BASES:

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you

are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Consent means that you have given us your consent to use your personal data. Where we are relying on consent as a lawful basis for processing, you may have the right to withdraw your consent (see below).

WHAT EXTERNAL THIRD PARTIES DO WE SHARE YOUR DATA WITH?

- Service providers who provide data hosting, website and webchat products / services.
- Service providers who provide software, IT and system administration products / services.
- Service providers who provide business administration products / services.
- Service providers who provide email marketing services.
- Providers of online review services.
- Third parties who provide delivery and payment services.
- Third parties who provide credit reference check services.
- Vets and microchip agencies (relevant to dog grooming services only).
- Stockists and wholesalers.
- Third parties who we work with in relation to events and promotions and who may ask us to provide you with goody bags etc.
- Organisations that employ you / organisations for which you are a point of contact.
- Professional advisers including lawyers, bankers, accountants, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others – we do not disclose information about identifiable individuals to our advertisers, but we may provide them with Aggregated Data.
- Analytics and search engine providers that assist us in the improvement and optimisation of our websites.

MORE ABOUT YOUR LEGAL RIGHTS:

You have the right to:

- ✓ **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- ✓ **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- ✓ **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local

law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- ✓ **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- ✓ **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- ✓ **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that 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.
- ✓ **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

December 2020.